

Pre-Submission Spelthorne Local Plan  
Representations Made Under Regulation 20 in  
Representor Name Order



# Spelthorne Takes Shape

November 2022

## **Pre-submission Spelthorne Local Plan - Representations Made Under Regulation 20 in Represor Name Order**

Over the 12-week Reg 19 consultation period (15 June – 21 September 2022) the Strategic Planning Team received 896 representations from 335 individuals and organisations regarding the Pre-submission Spelthorne Local Plan.

A number of respondents used the online questionnaire to submit their comments and others sent emails, letters or filled out the paper form. All of the responses have been entered into the Council consultation software under the policy, site or part of the plan which Officers felt was most appropriate. Where a long representation has been submitted, it has often been broken down into different policies and then then a PDF of the full document has been uploaded and can be accessed via the hyperlinks. Supporting documents, for example photos and maps, have been uploaded and can also be accessed via the hyperlinks in the tables.

This document contains all 896 representations received sorted alphabetically in represor name or organisation order. Where an agent has been used to submit the representation, it appears under the name of the person or organisation and not the agent.

Two separate documents contain the same information but sorted by policy and site in the order they appear in the plan or regarding the Sustainability Appraisal, evidence base and others. All of the comments received on that policy or a particular site can be found together.

<b>Respondent: A2 Dominion and Staines and Laleham Sports Association Limited (42337825)</b>
<b>Organisation:</b>

<b>Response ID: 1128281</b>
<b>Policy / Evidence Base / Part of Plan: Policy H2: Affordable Housing</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not effective - also selected. Please provide summary of attached 72 paged document.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Please provide summary of attached 72 paged document. Affordable Housing 2.64 A blanket requirement for all sites released from the Green Belt to secure 50% affordable cannot be justified. Whilst the need to provide more affordable housing is chronic and a EC in its own right, to which the scheme will contribute, the level and tenure of provision must be determined on a site-specific basis having regard to the wider benefits and EC that each scheme, as reflected in the terms of the allocation, will deliver. 2.65 The SALSAL scheme will result in wider benefits over and above those secured by other proposed Green Belt releases, notably the facilitation of retained and enhanced sporting facilities and recreational access to the Green Belt, meeting the policy requirements of paragraph 142 of the NPPF. This

is a cost burden met by the release of part of the Site for residential purposes, a burden not borne by all other Green Belt sites. The requirement for 50% affordable is not evidenced nor justified by the Council in the specific context of the SALSAL site and scheme and would undermine the achievability of the scheme and allocation.

2.66 The residential capacity of the site is identified as c. 52 new homes. Increasing the affordable requirement from the 30% proposed to 50% would increase the affordable provision from 16 homes to 26 homes. Affordable homes, in the absence of grant or other support, are built at a loss, cross subsidised by the private sale on the balance of the site. A2D is a well-established registered provider and estimate that the cost burden per affordable home equates to some £220k. Should the 50% requirement be maintained, then the subsidy and funds available to SALSAL would need to be reduced by that amount which would impact the re-provision and upgrade scheme. The alternative is to increase the extent of land released for residential, but this would undermine the purpose of the scheme which is to maintain and increase the sporting offer at the Site. Amendments to the draft allocation are proposed on this basis.

#### 4.0 OTHER COMMENTS

4.1 SALSAL and A2D's comments focus on the draft allocation for the Site and ensuring that this reflects the scheme and offer and facilitates the delivery of sports facilities for which there is an identified and evidenced need in the borough.

4.2 This includes amendment to the percentage requirement for affordable housing to ensure that this takes account of the additional costs this Site will bear in facilitating the sport re-provision/ upgrades compared to other sites proposed for release from the Green Belt. In amending the allocation, consequential amendment is required to draft Policy H2 Affordable Housing. This currently states that 'Greenfield sites will be expected to deliver at least 50% affordable housing' (part 1)). This ought to be amended to exempt those site allocations, such as the SALSAL Site, where site-specific considerations indicate that 30% affordable housing should be provided.

#### 5.0 SUMMARY

5.1 SALSAL and A2D welcomes the inclusion of the Staines and Laleham Sports Association Ground ('the Site': reference RL1/011) as a site allocation and the broad principles established through this. However, the allocation requires amendment to reflect the sports re-provision/ upgrade scheme as well as the residential element to ensure that the objectives of the scheme (i.e. to re-provide and upgrade the sports facilities and put SALSAL on a sound financial footing to secure it long-term sustainability) are realised. Moreover, that a policy mechanism is in place to secure such compensatory improvements to the land remaining with the Green Belt as required by NPPF paragraph 142.

5.2 Amendments are recommended to the draft allocation that include a list of the re-provided, upgraded and additional sporting facilities to reflect the latest evidence of need in the borough. For example, to include re-provision and upgrade of all sporting and ancillary facilities currently on the Site in addition to an indoor training facility.

5.3 Further amendments are required in respect of the percentage requirement for affordable housing on this Site owing to the site-specific circumstances and additional costs that will be borne to facilitate the re-provision and upgrade of the sports facilities. This should be the compliant 30% affordable as per draft Policy H2.

Policy H2 requires consequential amendment to reflect the exemption of the allocated sites, such as the SALSAL Site, where the circumstances of the Site and offer/ proposal/ allocation requirements indicate that 50% affordable is not appropriate.

5.4 Additionally, the timeframe for delivery of the scheme ought to be brought forward to reflect the pressing need for SALSAL to re-capitalise in the short-term and the absence of technical or contractual impediment to the scheme being delivered in the first five years of the Plan period.

5.5 It is clear from the evidence available that exceptional circumstances exist in Spelthorne to justify a review of the Green Belt boundaries. To ensure that such EC are clearly articulated and relate to the reasons why EC exist, amendments are suggested to the EC as drafted (see paragraph 2.60 above). Site-specific EC exist at the Site which support amendment to the Green Belt boundary in this location.

**Question 6:** You can upload any modifications below.

Jones, Alex - Rep Letter.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/615961/PDF/-/Jones%5F%20Alex%20%2D%20Rep%20Letter%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To provide additional clarification/ information to assist the Inspector's understanding of the facilitating case and any other matters relating to the merit of the allocation/ its deliverability and timeframes.

<b>Respondent: A2 Dominion and Staines and Laleham Sports Association Limited (42337825)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128282</b>	
<b>Policy / Evidence Base / Part of Plan: RL1/011 (Land at Staines and Laleham Sports Club, Worple Road)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
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Not effective - was also selected	
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Jones, Alex - Rep Letter.pdf

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To provide additional clarification/ information to assist the Inspector's understanding of the facilitating case and any other matters relating to the merit of the allocation/ its deliverability and timeframes

<b>Respondent: A2Dominion Group (42324225)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128123</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
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Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
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Also selected: Not Justified Not Effective Not Consistent with National Policy	
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I write with reference to the above. As you will be aware, I act for A2Dominion Group who have various interests in Spelthorne, including Land at Spelthorne Grove (site ID SC1/021) and Land at Stanwell Bedsits (site ID SN1/012). Whilst, having regard to the above, A2Dominion Group both support the Reg 19 Plan in principle, especially the proposed allocation of the Land at Spelthorne Grove and Land at Stanwell Bedsits, they do have specific concerns about certain aspects of policies SC1/021 and SN1/012 and the evidence base underpinning the plan.	



In saying this we acknowledge that the plan and its associated evidence base, as a whole, looks to demonstrate why the proposed allocations of the Land at Spelthorne Grove and Land at Stanwell Bedsits is justified, is deliverable and will be effective in meeting the requirements of the plan and national government guidance.

## 1 The Housing Requirement, Supply and Trajectory.

### a) The Requirement

1.1 Policy ST2 of the Reg 19 Plan indicates that the standard method housing need figure for the borough is 618 dwellings per year; and that over the full plan period 2022 to 2037, this equates to a need of some 9,270 dwellings. As set out in national planning policy guidance, policy ST2 should clarify that this is a minimum target. In addition, the housing trajectory should be contained within the plan itself, as an appendix, not in a separate paper, so it is clear upon adoption what it is the authority are seeking to rely upon; and that they have a rolling 5-year housing land supply (see below).

### b) Supply and Trajectory

1.2 Whilst not commenting upon the supply in detail, in reviewing the Reg 19 Housing Trajectory and Five Year Housing Land Supply Report of August 2022, we note that the supply sources the Council relies upon in the trajectory for the plan are summarised in figure 1 on page 3, and in the supporting tables, including table 1 on page 4 and table 4 on pages 11-14, which as per the main Reg 19 plan suggest, the Land at Spelthorne Grove and Land at Stanwell Bedsits will both deliver in years 11- 15 (2033 – 2037). Not only is the rationale for the delay in the release of these sites unclear<sup>1</sup>, but it's not clear from either of the Reg 19 plan itself or the Housing Trajectory and Five Year Housing Land Supply Report of August 2022, what the total quantum of development from these sites is expected to be. Page 20 of the Reg 19 Plan suggests the proposed allocations will deliver some 6,073 dwellings across the plan period. Table 1, page 4 of the Housing Trajectory and Five Year Housing Land Supply Report suggests some 7,846 dwellings will be delivered from 'projected large sites > 4 (completions based on commitments at 1 April and identified sites from the SLAA 2022'. It does not give a clear indication of what sites will be delivering when or what is expected from the different component parts of the proposed allocations. i.e. whilst the figure of 792 for those units under construction, 275 for windfalls from office to residential PD for years 6-15, and 570 for small windfalls is consistent between the sources of supply quoted on p20 of the Reg 19 Plan, and in table 1 of the Housing Trajectory and Five Year Housing Land Supply Report and the subsequent tables, the sum for the proposed allocations and the brownfield tier 2 sites is not. Whilst we note the table at p20 of the Reg 19 plan suggests that the yields identified in the Local Plan supersede that identified in the SLAA for allocated sites, and assume the Housing Trajectory and Five Year Housing Land Supply Report is derived from the SLAA, the scale of the difference, even when taking into account a 5% allowance for non-delivery is such that the Council really need to clarify the situation.

1.3 The above is compounded by the fact the scale of development proposed at Spelthorne Grove (SC1/021) and Stanwell Bedsits (SN1/012) is somewhat ambiguous. In both instances the scale of development is given as a net figure and we assume, given the content of the associated Officer Site Assessments, provides for a gross development figure of 458 and 413 respectively – see table JAA1 below and further comments on proposed policies SC1/021 and SN1/012 below. (See table in attached document on page 2)

1.4 Turning to other components of the supply as outlined on p20 of the submission plan we note that:

(i) Windfalls

1.5 Windfalls at 845 dwellings<sup>3</sup> amount to 9% of the overall supply across the plan period/ 11% when existing commitments are taken into consideration. Whilst we accept that changes to permitted development rights and the likes of office to residential conversions will help sustain windfall rates within the borough for the short term, we would question whether there is compelling evidence as per para 71 of the NPPF that they will provide a reliable source of supply longer term. Para 2.14 of the Housing Trajectory and Five Year Housing Land Supply Report of August 2022 does not in our opinion amount to compelling evidence.

1.6 We would thus recommend windfalls are removed from the 5 year HLS and the overall level of provision is reduced to circa 500 dwellings i.e. circa 5% of the overall supply.

(ii) Commitments – unimplemented consents

1.7 We note that the Housing Trajectory and Five Year Housing Land Supply Report of August 2022 suggests in table 1 that there are consents that have yet to be implemented that provide for some 961 dwellings. Whilst table 3 suggests this figure is in fact 956, either way it appears that the council expect all of these dwellings to be delivered within the first five years of the plan. At least one (Renshaw Industrial Estate) of these sites is an outline planning permission that was granted on 27 July 2018 and has now expired, with no RM submission made, does call into question whether this site will in fact deliver 275 dwellings in the first five years of the plan. In order to establish a robust evidence base SBC need to demonstrate that sites included in this list can deliver what is expected of them as per the Deliverability tests set out in Annex 2 of the NPPF.

(iii) The discount for under delivery

1.8 We note that the proposed supply set out on p20 of the Reg 19 Plan includes a 5% discount for under delivery of the proposed allocations and the brownfield tier 2 sites. Nowhere in the evidence base is the 5% figure justified. How for example, does it relate to historic levels of under delivery and how is it intended to deal with the potential under delivery of the proposed allocations – does it go far enough? The submission plans needs to clarify this to demonstrate that the plan is positively prepared, justified and will be effective.

(iv) Does the supply meet the need

1.9 Whilst we have not undertaken a detailed critique of the housing supply promoted in the submission plan, the above alone would suggest that rather than an oversupply of circa 169 dwellings the plan is actually deficient by at least 451 dwellings<sup>4</sup>, such that it is imperative the council do make the best of the proposed allocations so as to reduce the need for any further Green Belt releases.

c) Deliverability

1.10 Whilst, as set out above we are not commenting upon the different components of the housing supply in any detail, we note that a significant number of the proposed allocations are brownfield sites that require the relocation of existing uses/ business, some are in multiple ownerships and may require CPO (ST3/014 for example), or are occupied by multiple leaseholders (ST4/009 for example). Whilst we also note that most of these are not identified to deliver until years 6 to 10 and 11 to 15, and that a lot of the less constrained greenfield Green Belt sites are identified for delivery in years 1 to 5 (2023-2027), even some of these will be hard pushed to deliver the scale of development proposed within the timeframes suggested, given the fact

they can't be released from the Green Belt until the Local Plan Review is adopted<sup>5</sup>. This means that the deliverability of the 200 dwellings on Land to west of Long Lane and south of Blackburn Trading Estate, Stanwell (SN1/006) within years 1 – 56 has to be open to debate.

1.11 The above is compounded by the fact that the council do not have a very strong track record when it comes to housing delivery. The table below provides a brief summary of the council's housing delivery against its requirement over the past 13 years. As can be seen delivery over the past 6 years has been very poor, and with the exception of 2020/21 the council have struggled to deliver 300dpa let alone 618dpa. (table as per attached document page 4)

1.12 It is for this reason, and despite the adjustments made to the housing requirement due to Covid in the Housing Delivery Test, that the council are now identified as an authority where the presumption in favour of sustainable development is applied – see table 3 below. (table as per attached document page 4)

1.13 The above and the lack of evidence on delivery<sup>7</sup> again leads us to believe that the housing land supply needs to include a buffer to address any issues of deliverability.

d) The need for a Buffer

1.14 Page 20 of the Reg 19 plan indicates that the plan looks to deliver 9,439 dwellings over the plan period, some 169 dwelling's (1.83%) above the requirement of 9,270. As no clear housing trajectory has been provided to demonstrate how the housing requirement will be delivered/ that the assumptions in the Housing Trajectory and Five Year Housing Land

Supply Report are correct, we believe the council need to err on the side of caution and that a higher buffer needs to be introduced. This would both address any delay in the delivery of sites/ non delivery of sites, and to try and help address the acute affordable housing needs within the borough<sup>8</sup>.

1.15 Given the above, and whilst para 73(a) of the NPPF indicates that 'the supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of 5% to ensure choice and competition in the market for land'; we also note it suggests that 'a buffer of 10% is required where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, and to account for any fluctuations in the market during that year'. In addition, there is the reference in para 74 to the need to provide a 20% buffer, where there has been significant under delivery of housing over the previous three years, as there has here - see above. As such, we believe the buffer should as a minimum be 10%, but more realistically, given our comments above, and the constraints imposed by the Green Belt and areas of flood risk across the borough<sup>9</sup>, and the issues of unmet needs arising from the London boroughs and Elmbridge<sup>10</sup> be as high as 20%. Such a buffer would provide sufficient flexibility to enable the plan to adapt to rapid change as required by para 11 of the NPPF. To this end, we note that a buffer of 10% would increase the minimum requirement to 10,197 dwellings over the plan period / 680dpa; and a buffer of 20% would increase the minimum requirement to 11,124 dwellings over the plan period / 741dpa assuming the current plan period of 2022/23 to 2037, which as set out below we feel should be extended to 2038 and the figures adjusted accordingly – see para 1.22.

e) The Five Year HLS

1.16 We note the Housing Trajectory and Five Year Housing Land Supply Report of August 2022 suggests that the council have a 5.6 year supply given the projected completions for the period 2022/23 to 2026/27. In noting this, we have to say that the components of the proposed completions are not clearly evidenced as they rely for the most part on the completion of existing commitments (under construction, or with planning permission and not yet started), estimated windfalls, and 'identified SLAA sites', which we assume are those allocated in years 2022/23 – 2026/27 in the Draft Plan and set out in tables 4 and 5 of the Housing Trajectory and Five Year Housing Land Supply Report, which as set out above include a significant number of Green Belt sites. Even taking into account the commitments under construction (792) the unimplemented commitments (961 minus the 275 dwellings on Renshaw Industrial Estate – see above) and the identified urban sites (Reg 19 allocations + brownfield tier 2 sites) from table 4 and the Green Belt sites from table 5 scheduled to deliver in yrs 1- 5 you do not arrive at the 2,187 suggested in table 7 of the Housing Trajectory and Five Year Housing Land Supply Report. Whilst table 1 (sum of SLAA totals (urban sites >4) and Green Belt sites) do together provide for 2,187, the difference between this and the 1,992 arrived at from tables 4 and 5 is not clear, and at 195 dwellings has a material impact on the housing land supply.

1.17 As set out below, if one compares the position set out in the Housing Trajectory and Five Year Housing Land Supply Report, and our position – on just these two deliverables alone, the difference suggests that rather than a 5 year supply the council actually have a 5 year deficit.

1.18 The above is supported by the GL Hearn 'Planning for Housing Delivery' which whilst highlighting the need for Green Belt releases to ensure the council can provide for its housing requirement and thus avoid planning by appeal, at the same time highlights the volatility of the housing land supply position, especially beyond 2024/2512, and how without the proposed Green Belt releases the council can't demonstrate a 5 year housing land supply from the point of adoption/ that even with them the plan can't demonstrate a 5 year supply until adoption<sup>13</sup>.

1.19 The Five Year housing land supply is thus clearly volatile before one even begins to review the proposed commitments in more detail / the proposed allocations ability to deliver the scale of development suggested in the first five years when they have in some instances still to be released from the Green Belt (see above/ below). Whilst the GL Hearn 'Planning for Housing Delivery' seeks to address the issue of the reliability of the proposed build out rates its conclusions are not particularly glowing in this regard, para 1.32 of the exec summary stating:

'The study has identified a potentially modest over-estimation of the BOR of sites listed in the land supply pipeline will achieve in reality. This does not of itself warrant additional sites being allocated from the Green Belt, but it does increase "development risk" in the Borough'<sup>14</sup>

1.20 In addition to the above the Housing Trajectory and Five Year Housing Land Supply Report of August 2022 does not actually provide any clarity on the rolling 5 year supply post adoption. The local plan must, when it is submitted, provide clear evidence of a rolling Five Year housing land supply if it is to be found sound. In order to help address this point, the council should in our opinion review with the site promoters their estimation of when sites will deliver as the timescale set against the likes of SC1/021 (Land at Spelthorne Grove) and SN1/012 (Stanwell Bedsits, De Havilland Way) are not realistic/ could be bought forward to assist the rolling Five Year housing land supply. To this end whilst noting para 2.17 of the Housing Trajectory and Five Year Housing Land Supply Report of August 2022, we have to say no discussions have taken place with A2Dominion Group about when the land at Spelthorne Grove and land at Stanwell Bedsits, could realistically start delivering, the estimated 2033-2037 being overly pessimistic in our opinion.

See attached document for full rep.

**Question 6:** You can upload any modifications below.

JAA Redacted letter to SBC for A2D re Reg 19 Plan - Sept 2022 - A2Dominion Group\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618794/PDF/->

[/JAA%20Redacted%20letter%20to%20SBC%20for%20A2D%20re%20Reg%2019%20Plan%20%2D%20Sept%202022%20%2D%20A2Dominion%20Group%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618794/PDF/-/JAA%20Redacted%20letter%20to%20SBC%20for%20A2D%20re%20Reg%2019%20Plan%20%2D%20Sept%202022%20%2D%20A2Dominion%20Group%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: A2Dominion Group have an interest in Land at Spelthorne Grove (SC1/021) and Land at Stanwell Bedsits (SN1/012), both of which are proposed allocations in the Pre-submission Spelthorne Local Plan 2022-2037. They are also active elsewhere in the Borough and have an interest in ensuring the legality and soundness of the Local Plan.

They therefore wish me to participate in the examination

<b>Respondent: A2Dominion Group (42324225)</b>
<b>Organisation:</b>

<b>Response ID: 1128124</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
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Yes/No/Not answered: No   Additional Comments: Not Justified, Not Consistent with National Policy
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<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
General Policy Overview and the Issue of Viability I write with reference to the above. As you will be aware, I act for A2Dominion Group who have various interests in Spelthorne, including Land at Spelthorne Grove (site ID SC1/021) and Land at Stanwell Bedsits (site ID SN1/012). Whilst, having regard to the above, A2Dominion Group both support the Reg 19 Plan in principle, especially the proposed allocation of the Land at Spelthorne Grove and Land at Stanwell Bedsits, they do have specific concerns about certain aspects of policies SC1/021 and SN1/012 and the evidence base underpinning the plan.

In saying this we acknowledge that the plan and its associated evidence base, as a whole, looks to demonstrate why the proposed allocations of the Land at Spelthorne Grove and Land at Stanwell Bedsits is justified, is deliverable and will be effective in meeting the requirements of the plan and national government guidance.

## 1 The Housing Requirement, Supply and Trajectory.

### a) The Requirement

1.1 Policy ST2 of the Reg 19 Plan indicates that the standard method housing need figure for the borough is 618 dwellings per year; and that over the full plan period 2022 to 2037, this equates to a need of some 9,270 dwellings. As set out in national planning policy guidance, policy ST2 should clarify that this is a minimum target. In addition, the housing trajectory should be contained within the plan itself, as an appendix, not in a separate paper, so it is clear upon adoption what it is the authority are seeking to rely upon; and that they have a rolling 5-year housing land supply (see below).

### b) Supply and Trajectory

1.2 Whilst not commenting upon the supply in detail, in reviewing the Reg 19 Housing Trajectory and Five Year Housing Land Supply Report of August 2022, we note that the supply sources the Council relies upon in the trajectory for the plan are summarised in figure 1 on page 3, and in the supporting tables, including table 1 on page 4 and table 4 on pages 11-14, which as per the main Reg 19 plan suggest, the Land at Spelthorne Grove and Land at Stanwell Bedsits will both deliver in years 11- 15 (2033 – 2037). Not only is the rationale for the delay in the release of these sites unclear<sup>1</sup>, but it's not clear from either of the Reg 19 plan itself or the Housing Trajectory and Five Year Housing Land Supply Report of August 2022, what the total quantum of development from these sites is expected to be. Page 20 of the Reg 19 Plan suggests the proposed allocations will deliver some 6,073 dwellings across the plan period. Table 1, page 4 of the Housing Trajectory and Five Year Housing Land Supply Report suggests some 7,846 dwellings will be delivered from 'projected large sites > 4 (completions based on commitments at 1 April and identified sites from the SLAA 2022'. It does not give a clear indication of what sites will be delivering when or what is expected from the different component parts of the proposed allocations. i.e. whilst the figure of 792 for those units under construction, 275 for windfalls from office to residential PD for years 6-15, and 570 for small windfalls is consistent between the sources of supply quoted on p20 of the Reg 19 Plan, and in table 1 of the Housing Trajectory and Five Year Housing Land Supply Report and the subsequent tables, the sum for the proposed allocations and the brownfield tier 2 sites is not. Whilst we note the table at p20 of the Reg 19 plan suggests that the yields identified in the Local Plan supersede that identified in the SLAA for allocated sites, and assume the Housing Trajectory and Five Year Housing Land Supply Report is derived from the SLAA, the scale of the difference, even when taking into account a 5% allowance for non-delivery is such that the Council really need to clarify the situation.

1.3 The above is compounded by the fact the scale of development proposed at Spelthorne Grove (SC1/021) and Stanwell Bedsits (SN1/012) is somewhat ambiguous. In both instances the scale of development is given as a net figure and we assume, given the content of the associated Officer Site Assessments, provides for a gross development figure of 458 and 413 respectively – see table JAA1 below and further comments on proposed policies SC1/021 and SN1/012 below. (See table in attached document on page 2)

1.4 Turning to other components of the supply as outlined on p20 of the submission plan we note that:

(i) Windfalls

1.5 Windfalls at 845 dwellings<sup>3</sup> amount to 9% of the overall supply across the plan period/ 11% when existing commitments are taken into consideration. Whilst we accept that changes to permitted development rights and the likes of office to residential conversions will help sustain windfall rates within the borough for the short term, we would question whether there is compelling evidence as per para 71 of the NPPF that they will provide a reliable source of supply longer term. Para 2.14 of the Housing Trajectory and Five Year Housing Land Supply Report of August 2022 does not in our opinion amount to compelling evidence.

1.6 We would thus recommend windfalls are removed from the 5 year HLS and the overall level of provision is reduced to circa 500 dwellings i.e. circa 5% of the overall supply.

(ii) Commitments – unimplemented consents

1.7 We note that the Housing Trajectory and Five Year Housing Land Supply Report of August 2022 suggests in table 1 that there are consents that have yet to be implemented that provide for some 961 dwellings. Whilst table 3 suggests this figure is in fact 956, either way it appears that the council expect all of these dwellings to be delivered within the first five years of the plan. At least one (Renshaw Industrial Estate) of these sites is an outline planning permission that was granted on 27 July 2018 and has now expired, with no RM submission made, does call into question whether this site will in fact deliver 275 dwellings in the first five years of the plan. In order to establish a robust evidence base SBC need to demonstrate that sites included in this list can deliver what is expected of them as per the Deliverability tests set out in Annex 2 of the NPPF.

(iii) The discount for under delivery

1.8 We note that the proposed supply set out on p20 of the Reg 19 Plan includes a 5% discount for under delivery of the proposed allocations and the brownfield tier 2 sites. Nowhere in the evidence base is the 5% figure justified. How for example, does it relate to historic levels of under delivery and how is it intended to deal with the potential under delivery of the proposed allocations – does it go far enough? The submission plans needs to clarify this to demonstrate that the plan is positively prepared, justified and will be effective.

(iv) Does the supply meet the need

1.9 Whilst we have not undertaken a detailed critique of the housing supply promoted in the submission plan, the above alone would suggest that rather than an oversupply of circa 169 dwellings the plan is actually deficient by at least 451 dwellings<sup>4</sup>, such that it is imperative the council do make the best of the proposed allocations so as to reduce the need for any further Green Belt releases.

c) Deliverability

1.10 Whilst, as set out above we are not commenting upon the different components of the housing supply in any detail, we note that a significant number of the proposed allocations are brownfield sites that require the relocation of existing uses/ business, some are in multiple ownerships and may require CPO (ST3/014 for example), or are occupied by multiple leaseholders (ST4/009 for example). Whilst we also note that most of these are not identified to deliver until years 6 to 10 and 11 to 15, and that a lot of the less constrained greenfield Green Belt sites are identified for delivery in years 1 to 5 (2023-2027), even some of these will be hard pushed to deliver the scale of development proposed within the timeframes suggested, given the fact



they can't be released from the Green Belt until the Local Plan Review is adopted<sup>5</sup>. This means that the deliverability of the 200 dwellings on Land to west of Long Lane and south of Blackburn Trading Estate, Stanwell (SN1/006) within years 1 – 56 has to be open to debate.

1.11 The above is compounded by the fact that the council do not have a very strong track record when it comes to housing delivery. The table below provides a brief summary of the council's housing delivery against its requirement over the past 13 years. As can be seen delivery over the past 6 years has been very poor, and with the exception of 2020/21 the council have struggled to deliver 300dpa let alone 618dpa. (table as per attached document page 4)

1.12 It is for this reason, and despite the adjustments made to the housing requirement due to Covid in the Housing Delivery Test, that the council are now identified as an authority where the presumption in favour of sustainable development is applied – see table 3 below. (table as per attached document page 4)

1.13 The above and the lack of evidence on delivery<sup>7</sup> again leads us to believe that the housing land supply needs to include a buffer to address any issues of deliverability.

d) The need for a Buffer

1.14 Page 20 of the Reg 19 plan indicates that the plan looks to deliver 9,439 dwellings over the plan period, some 169 dwelling's (1.83%) above the requirement of 9,270. As no clear housing trajectory has been provided to demonstrate how the housing requirement will be delivered/ that the assumptions in the Housing Trajectory and Five Year Housing Land

Supply Report are correct, we believe the council need to err on the side of caution and that a higher buffer needs to be introduced. This would both address any delay in the delivery of sites/ non delivery of sites, and to try and help address the acute affordable housing needs within the borough<sup>8</sup>.

1.15 Given the above, and whilst para 73(a) of the NPPF indicates that 'the supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of 5% to ensure choice and competition in the market for land'; we also note it suggests that 'a buffer of 10% is required where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, and to account for any fluctuations in the market during that year'. In addition, there is the reference in para 74 to the need to provide a 20% buffer, where there has been significant under delivery of housing over the previous three years, as there has here - see above. As such, we believe the buffer should as a minimum be 10%, but more realistically, given our comments above, and the constraints imposed by the Green Belt and areas of flood risk across the borough<sup>9</sup>, and the issues of unmet needs arising from the London boroughs and Elmbridge<sup>10</sup> be as high as 20%. Such a buffer would provide sufficient flexibility to enable the plan to adapt to rapid change as required by para 11 of the NPPF. To this end, we note that a buffer of 10% would increase the minimum requirement to 10,197 dwellings over the plan period / 680dpa; and a buffer of 20% would increase the minimum requirement to 11,124 dwellings over the plan period / 741dpa assuming the current plan period of 2022/23 to 2037, which as set out below we feel should be extended to 2038 and the figures adjusted accordingly – see para 1.22.

e) The Five Year HLS

1.16 We note the Housing Trajectory and Five Year Housing Land Supply Report of August 2022 suggests that the council have a 5.6 year supply given the projected completions for the period 2022/23 to 2026/27. In noting this, we have to say that the components of the proposed completions are not clearly evidenced as they rely for the most part on the completion of existing commitments (under construction, or with planning permission and not yet started), estimated windfalls, and 'identified SLAA sites', which we assume are those allocated in years 2022/23 – 2026/27 in the Draft Plan and set out in tables 4 and 5 of the Housing Trajectory and Five Year Housing Land Supply Report, which as set out above include a significant number of Green Belt sites. Even taking into account the commitments under construction (792) the unimplemented commitments (961 minus the 275 dwellings on Renshaw Industrial Estate – see above) and the identified urban sites (Reg 19 allocations + brownfield tier 2 sites) from table 4 and the Green Belt sites from table 5 scheduled to deliver in yrs 1- 5 you do not arrive at the 2,187 suggested in table 7 of the Housing Trajectory and Five Year Housing Land Supply Report. Whilst table 1 (sum of SLAA totals (urban sites >4) and Green Belt sites) do together provide for 2,187, the difference between this and the 1,992 arrived at from tables 4 and 5 is not clear, and at 195 dwellings has a material impact on the housing land supply.

1.17 As set out below, if one compares the position set out in the Housing Trajectory and Five Year Housing Land Supply Report, and our position – on just these two deliverables alone, the difference suggests that rather than a 5 year supply the council actually have a 5 year deficit.

1.18 The above is supported by the GL Hearn 'Planning for Housing Delivery' which whilst highlighting the need for Green Belt releases to ensure the council can provide for its housing requirement and thus avoid planning by appeal, at the same time highlights the volatility of the housing land supply position, especially beyond 2024/2512, and how without the proposed Green Belt releases the council can't demonstrate a 5 year housing land supply from the point of adoption/ that even with them the plan can't demonstrate a 5 year supply until adoption<sup>13</sup>.

1.19 The Five Year housing land supply is thus clearly volatile before one even begins to review the proposed commitments in more detail / the proposed allocations ability to deliver the scale of development suggested in the first five years when they have in some instances still to be released from the Green Belt (see above/ below). Whilst the GL Hearn 'Planning for Housing Delivery' seeks to address the issue of the reliability of the proposed build out rates its conclusions are not particularly glowing in this regard, para 1.32 of the exec summary stating:

'The study has identified a potentially modest over-estimation of the BOR of sites listed in the land supply pipeline will achieve in reality. This does not of itself warrant additional sites being allocated from the Green Belt, but it does increase "development risk" in the Borough'<sup>14</sup>

1.20 In addition to the above the Housing Trajectory and Five Year Housing Land Supply Report of August 2022 does not actually provide any clarity on the rolling 5 year supply post adoption. The local plan must, when it is submitted, provide clear evidence of a rolling Five Year housing land supply if it is to be found sound. In order to help address this point, the council should in our opinion review with the site promoters their estimation of when sites will deliver as the timescale set against the likes of SC1/021 (Land at Spelthorne Grove) and SN1/012 (Stanwell Bedsits, De Havilland Way) are not realistic/ could be bought forward to assist the rolling Five Year housing land supply. To this end whilst noting para 2.17 of the Housing Trajectory and Five Year Housing Land Supply Report of August 2022, we have to say no discussions have taken place with A2Dominion Group about when the land at Spelthorne Grove and land at Stanwell Bedsits, could realistically start delivering, the estimated 2033-2037 being overly pessimistic in our opinion.

See attached document for full rep.

**Question 6:** You can upload any modifications below.

JAA Redacted letter to SBC for A2D re Reg 19 Plan - Sept 2022 - A2Dominion Group\_Redacted.pdf

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: A2Dominion Group have an interest in Land at Spelthorne Grove (SC1/021) and Land at Stanwell Bedsits (SN1/012), both of which are proposed allocations in the Pre-submission Spelthorne Local Plan 2022-2037. They are also active elsewhere in the Borough and have an interest in ensuring the legality and soundness of the Local Plan.

They therefore wish me to participate in the examination

<b>Respondent: A2Dominion Group (42324225)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128125</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: Not Consistent with National Policy Not Justified
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
f) The Plan Period 1.21 Para 22 of the NPPF is clear that: ‘Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure’. The plan period set out in the Reg 19 Plan is 2022- 2037. Only if the plan is adopted in 2022 will it thus look ahead over a minimum plan period of 15 years as required by the NPPF. As adoption in 2022 is highly unlikely to occur the plan period should in our opinion look to the period 2022- 2038 as a minimum and look to address the corresponding housing and employment needs for that extended period. Please see attached for full response.	

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: A2Dominion Group have an interest in Land at Spelthorne Grove (SC1/021) and Land at Stanwell Bedsits (SN1/012), both of which are proposed allocations in the Pre-submission Spelthorne Local Plan 2022-2037. They are also active elsewhere in the Borough and have an interest in ensuring the legality and soundness of the Local Plan.

They therefore wish me to participate in the examination

<b>Respondent: A2Dominion Group (42324225)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128134</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Not consistent with national policy - also selected	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
PS1: Responding to the climate emergency 5.2 Whilst supporting the principles behind this policy, the requirements of the policy do appear to look to mirror the requirements of building regulations in for example criterion 3a and 5, which given para 16 of the NPPF appears unnecessary, and we would suggest is addressed prior to submission. In addition we believe, given the findings of the Community Infrastructure Levy (CIL) Review Viability Assessment (2020 - 22), (July 2022), (see below) this policy should be caveated so that where a developer can demonstrate that it is not viable to deliver as required they are able to negotiate an alternative, in a way comparable to that set out in policy H2 (2)(b) and (h) i.e. be required to accord with the policy unless demonstrably unviable to do so.	

5.3 In the context of the above, the proposed estate regeneration schemes at Spelthorne Grove and Stanwell Bedsits, De Havilland Way are a lot more complex than other brownfield developments and often have negative land values such that full compliance with policies such as PS1 may not be viable. As however this is not necessarily a matter that will be resolved until a scheme has been worked through and agreed with the council it's important that policy PS1 is caveated in this way.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: A2Dominion Group have an interest in Land at Spelthorne Grove (SC1/021) and Land at Stanwell Bedsits (SN1/012), both of which are proposed allocations in the Pre-submission Spelthorne Local Plan 2022-2037. They are also active elsewhere in the Borough and have an interest in ensuring the legality and soundness of the Local Plan.

They therefore wish me to participate in the examination

<b>Respondent: A2Dominion Group (42324225)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128126</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS2: Designing places and spaces	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>PS2: Designing places and spaces</p> <p>5.4 Again whilst supporting this policy in principle we do feel that it needs greater clarity – especially criterion 7, which states:  Given the size, function and proposed density of major developments, particularly those exceeding 50 dwellings, tall buildings and/or allocated sites on former Green Belt land, it may not always be desirable to reflect locally distinct patterns of development. These sites should create their own identity to ensure cohesive and vibrant neighbourhoods. High rise development in appropriate locations will be expected to be supported by a visual impact assessment and demonstrate a positive contribution to the skyline through its architectural merits. In Staines, the Development Framework will provide site specific guidance on the design of larger and tall buildings. On a case-by-case basis, it may be appropriate for larger developments to be shaped by a design panel review process at the applicant’s expense, and in conjunction with the Council.</p>	



5.5 The council should, given the work they have done to date on the proposed allocations and the content of the 'officers assessment' report be able to identify those sites that they feel will require a design panel review and make this clear in the wording of the site specific policy so it is clear to all concerned what is required of that development.  
See attached for full response.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: A2Dominion Group have an interest in Land at Spelthorne Grove (SC1/021) and Land at Stanwell Bedsits (SN1/012), both of which are proposed allocations in the Pre-submission Spelthorne Local Plan 2022-2037. They are also active elsewhere in the Borough and have an interest in ensuring the legality and soundness of the Local Plan.

They therefore wish me to participate in the examination

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: A2Dominion Group (42324225)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128289</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy SP4: Green Belt	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>Further to our various discussions and the recent publication of the Regulation 19 consultation version of the emerging Local Plan I write to provide you with an update.</p> <p>Unfortunately the negotiations between A2D and the landowner have concluded with the landowner confirming they no longer wish to proceed with the release of the site for development at this time.</p> <p>The purpose of this email is therefore to advise that A2D is no longer working with the landowner and the site is unlikely to be coming forward for development at the present time.</p> <p>I have copied in the main Regulation 19 consultation email address so that your colleagues in the Council's Local Plans team can log this email as a formal consultation response on behalf of A2D confirming that the site is unlikely to be available for development at the present time.</p> <p>I trust this confirmation is of assistance and do call with any queries.</p>	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: A2Dominion Group (42324225)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128122</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy H1: Homes for All	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Not Consistent with National Policy - was also selected.	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>H1: Homes for All</p> <p>5.6 Again whilst supporting this policy in principle, we would question the requirements of policy H1 (criterion 8) as there is in our opinion no justification within the evidence base to support the proposition that all new homes must be designed and constructed in accordance with the requirements of Building Regs Part M4(2), unless demonstrably unfeasible; likewise there is no justification within the evidence base to support the proposition that at least 10% of new homes on major developments accord with M4(3).</p> <p>5.7 Footnote 49 of para 130 (f) of the NPPF is clear in that planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing, where this would address ‘an identified need for such properties’.</p>	

5.8 The English Homes Survey examined the need for adaptations in 2014/15 and noted that 9% of all households in England had one or more people with a long-term limiting illness or disability that required adaptations to their home. The survey also found that in 2014-15, 81% of households that required adaptations in their home, due to their long-term limiting disability, felt their current home was suitable for their needs and that only 10% of those households whose home required an adaptation were trying to move somewhere more suitable.

5.9 Given the above, and whilst we recognise that with an ageing population there will be more people with mobility problems in future, we do not consider that clear evidence has been provided of an identified need, and do not believe a requirement for all new homes to meet M4(2) to be justified or consistent with national policy.

5.10 In addition, we feel that criterion 13 needs greater clarity. As drafted it states:

‘The Council will support Self and Custom Build developments for residential accommodation in appropriate locations .... In considering major development applications, the Council will consider the currently applicable Self Build Register and whether provision should be included within the development’

5.11 The council should, given the work they have done to date on the proposed allocations and the content of the ‘officers assessment’ report be able to identify those sites that they feel will be suitable for some form of Self and Custom Build homes and make this clear in the wording of the site specific policy so it is clear to all concerned what is required of that development. Given the nature of the estate regeneration schemes at Spelthorne Grove and Stanwell Bedsits we assume no such provision will be required here.

See attached for full rep.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: A2Dominion Group have an interest in Land at Spelthorne Grove (SC1/021) and Land at Stanwell Bedsits (SN1/012), both of which are proposed allocations in the Pre-submission Spelthorne Local Plan 2022-2037. They are also active elsewhere in the Borough and have an interest in ensuring the legality and soundness of the Local Plan.

They therefore wish me to participate in the examination



<b>Respondent: A2Dominion Group (42324225)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128136</b>	
<b>Policy / Evidence Base / Part of Plan: Policy H2: Affordable Housing</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Not Consistent with National Policy - was also selected	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
H2: Affordable Housing 5.12 Again whilst supporting this policy in principle, the specifics of the estate regeneration projects at Spelthorne Grove and Stanwell Bedsits is such that the requirement on the net uplift will need to have regard to that being replaced and the economic viability of these schemes, which could well affect the scale of affordable provision and / or the tenure split. see attached for full response	
<b>Question 6: You can upload any modifications below.</b>	
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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: A2Dominion Group have an interest in Land at Spelthorne Grove (SC1/021) and Land at Stanwell Bedsits (SN1/012), both of which are proposed allocations in the Pre-submission Spelthorne Local Plan 2022-2037. They are also active elsewhere in the Borough and have an interest in ensuring the legality and soundness of the Local Plan. They therefore wish me to participate in the examination



<b>Respondent: A2Dominion Group (42324225)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128135</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ID1: Infrastructure and Delivery	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Not Consistent with National Policy - also selected	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
ID1: Infrastructure and Delivery 5.13 Again whilst supporting this policy in principle it's important to note that with CiL in place any contributions sought over and above CiL will need to be fully justified. To this end we would expect policy ID1 to be caveated such that where any additional requests are made, they will not be pursued where it can be demonstrated this would make a development unviable. see attached for full rep.	
<b>Question 6:</b> You can upload any modifications below.	
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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: A2Dominion Group have an interest in Land at Spelthorne Grove (SC1/021) and Land at Stanwell Bedsits (SN1/012), both of which are proposed allocations in the Pre-submission Spelthorne Local Plan 2022-2037. They are also active elsewhere in the Borough and have an interest in ensuring the legality and soundness of the Local Plan. They therefore wish me to participate in the examination

<b>Respondent: A2Dominion Group (42324225)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128130</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ID2: Sustainable Transport for New Developments	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Not consistent with national policy - was also selected	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
ID2: Sustainable Transport for New Developments 5.14 Again whilst supporting this policy in principle we do question the dogged adherence to vehicle parking standards. Where allocating sites in sustainable locations with good access to local services and facilities it would in our opinion, and having regard to the climate emergency the council have called/ the issues associated with the AQMA in Spelthorne, make more sense to start to target a more forward-thinking strategy which looks to actively promote electric car clubs that could serve the needs of existing and future residents in a more energy efficient and climate friendly way. Given the scale of development and thus the densities advanced on some of the proposed allocations, compliance with existing parking standards will be difficult to achieve without prejudice to the overall design, significant costs (via the introduction of podium/ underground parking), or an impact on unit numbers,	

such that we would recommend that the council seriously review their parking strategy and its implications for the borough longer term. The strategy advocated at criterion 1(f) is much more in tune with the climate objectives of the plan than criterion 1(b).

5.15 Only in policy ID2 (1(e)) is it made clear that the Infrastructure Delivery Plan (IDP) upon which the plan relies is still forthcoming – whilst obvious from a review the evidence base, the lack of an IDP does call into question how the council have sought to test the requirements they are placing on the proposed allocations and the requirement of policies such as PS1, ID1 and ID2. And thus, highlight's the need for these policies to be caveated in such a way that enables a variation from the policy requirement when compliance is shown to be unviable.

see attached document for full rep

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: A2Dominion Group have an interest in Land at Spelthorne Grove (SC1/021) and Land at Stanwell Bedsits (SN1/012), both of which are proposed allocations in the Pre-submission Spelthorne Local Plan 2022-2037. They are also active elsewhere in the Borough and have an interest in ensuring the legality and soundness of the Local Plan.

They therefore wish me to participate in the examination

<b>Respondent: A2Dominion Group (42324225)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128129</b>	
<b>Policy / Evidence Base / Part of Plan: SC1/021 (Land at Spelthorne Grove)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Not consistent with national policy - also selected	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
4 The Proposed Allocations	
4.1 As set out above, whilst A2Dominion Group support the proposed allocation of the land at Spelthorne Grove and Land at Stanwell Bedsits, they do have specific concerns about certain aspects of policies SC1/021 and SN1/012. Taking each in turn we note the following: SC1/021 (Land at Spelthorne Grove)	
4.2 Policy SC1/021 suggests that the proposed allocation is for: Residential (C3): 250 net units (approx.) Open space: Retention of existing or reprovision within the wider site.	

4.3 As set out above we believe the policy needs to be clear what is actually anticipated on a net and gross basis so that it is clear to local residents what the scale of development is. In this regard, as also noted above, it's clear from the separate 'Officer Site Assessments' report that as the existing site accommodates circa 208 dwellings and the proposed is a net gain of 250, thus the overall scale of development on this site will be 458. To ensure the policy wording is clear and effective it should in our opinion make it clear that the site is to be redeveloped to provide for a minimum of 458 dwellings, a minimum net gain of 250 on that currently in situ. It is not clear how the council have arrived at a figure of 250 dwellings, whilst A2Dominion have commissioned a team to understand the constraints and opportunities and development opportunity of the site and are confident that the redevelopment of the estate can accommodate at least an additional 250 new homes. Therefore to ensure this site delivers the number of homes stated within the housing trajectory and maximises the use of PDL the policy should refer to 'a minimum of 250 net units'.

4.4 In addition we note that the site specific requirements include the retention or re-provision of an open space/recreation area within the site to a better standard and improved location. As, we understand matters the western part of the proposed allocation includes land that is controlled by Tesco and falls under two separate designations:

- The southern part is retained POS and designate as a play area in the LP. It was gifted by Tesco to SBC in 1989 under the S106 for the Tesco store.
- The northern part is maintained as POS to safeguard the amenity of adjacent residents under the terms of Tesco's PP.

4.5 Given the above and having regard to policy E5 of the draft Plan, it would seem that the western part of the proposed allocation would be better retained as is, and improved, whilst the estate regeneration is restricted to the area under A2Dominion Groups control, with contributions provided to enhance the western area to meet the criteria of the site specific requirements.

4.6. We note the other site specific requirements include:

- Include measures to mitigate the impact of development on the local road network and take account of impacts on the strategic road network as identified through a site specific Travel Plan and Transport Assessment.
- Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms.
- A suitable decanting plan for the existing properties as to minimise the disruption for current residents.
- Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy DS2 to make buildings zero carbon where possible.

4.7 And that Opportunities include:

- This plot lends itself to a well-designed scheme that makes a positive contribution to the wider street scene.
- Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options.'

4.8 In supporting the proposed policy we would suggest, given our comments on the SA above, that the second site specific requirement includes reference to the provision of an electric car club and associated reduction in parking provision relative to the councils parking standards given the site's access to local services and facilities, including public transport facilities, and that the 5<sup>th</sup> bullet point also references the need for flood mitigation

measures to be provided for, given the sites location within flood zone 2. We also wonder whether the fifth bullet point should be cross referencing policy PS1 not DS2 as there is no DS2 in the Local Plan Review. If so, we would ask that this has regard to our comments on policy PS1 below.

4.9 Finally we note that policy SC1/021 suggests that the proposed allocation delivers in years 2033-2037. Whilst as an estate regeneration scheme, the logistics of development are more complex than a straight forward greenfield development, to set development back to 2033 seems somewhat overly pessimistic. As A2Dominion Group have already had one pre-app and are now advanced on their background surveys and are developing/evolving a masterplan, there is no reason why this site cannot be moved forward for delivery in 2028-2032

See attached for full rep.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: A2Dominion Group have an interest in Land at Spelthorne Grove (SC1/021) and Land at Stanwell Bedsits (SN1/012), both of which are proposed allocations in the Pre-submission Spelthorne Local Plan 2022-2037. They are also active elsewhere in the Borough and have an interest in ensuring the legality and soundness of the Local Plan.

They therefore wish me to participate in the examination

<b>Respondent: A2Dominion Group (42324225)</b>
<b>Organisation:</b>

<b>Response ID: 1128128</b>
<b>Policy / Evidence Base / Part of Plan: SN1/012 (Stanwell Bedsits, De Havilland Way)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not effective - also selected
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
SN1/012 (Stanwell Bedsits, De Havilland Way) 4.10 Policy SN1/012 suggests that the proposed allocation is for: Residential (C3): 175 net units (approx.) 4.11 As set out above we believe the policy needs to be clear what is actually anticipated on a net and gross basis so that it is clear to local residents what the scale of development is. In this regard, as noted above, it's clear from the separate 'Officer Site Assessments' report that as the existing is circa 242 studio apartments and the proposed is a net gain of 175 the overall scale of development on this site will be 413. To ensure the policy wording is clear and effective it should in our opinion make it clear that the site is to be redeveloped to provide for a minimum of 413 dwellings, a minimum net gain of 175 on that currently in situ.



4.12 In addition we note that the site specific requirements include

- Holistic redevelopment of the site to provide a new high quality housing scheme.
- Include measures to mitigate the impact of development on the local road network and take account of impacts on the strategic road network as identified through a site specific Travel Plan and Transport Assessment.
- Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms.
- A suitable decanting plan for the existing properties as to minimise the disruption for current residents.
- Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy DS2 to make buildings zero carbon where possible.'

4.13 And that opportunities include:

- This plot lends itself to a well-designed scheme that makes a positive contribution to the wider street scene.
- Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options.
- Active frontages at the boundary edges.
- Enhanced permeability of the site with the opportunity for new pedestrian routes.
- Sensitive design that draws on the Stanwell conservation area character.
- Stepped heights away from the centre of the site, to minimise impact on surrounding homes'.

4.14 In supporting the proposed policy we would suggest, given our comments on the SA above, that the second site specific requirement includes reference to the provision of an electric car club as a means to enhance accessibility in an energy efficient way. Again we also wonder whether the fifth bullet point should be cross referencing policy PS1 not DS2 as there is no DS2 in the Local Plan Review. If so, we would ask that this has regard to our comments on policy PS1 below

4.15 Finally we note that policy SN1/012 also suggests that the proposed allocation delivers in years 2033-2037. Again, whilst as an estate regeneration scheme the logistics of development are more complex than a straight forward greenfield development, to set development back to 2033 seems somewhat overly pessimistic. As A2Dominion Group have already had one pre app and are now advanced on their background surveys there is no reason why this site cannot be moved forward for delivery in 2028-2032

See attached for full rep.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: A2Dominion Group have an interest in Land at Spelthorne Grove (SC1/021) and Land at Stanwell Bedsits (SN1/012), both of which are proposed allocations in the Pre-submission Spelthorne Local Plan 2022-2037. They are also active elsewhere in the Borough and have an interest in ensuring the legality and soundness of the Local Plan.

They therefore wish me to participate in the examination

<b>Respondent: A2Dominion Group (42324225)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128131</b>	
<b>Policy / Evidence Base / Part of Plan: Sustainability Appraisal</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Not Consistent with National Policy Not Justified Not Positively Prepared Not Effective	Additional Comments: No Not Consistent with National Policy Not Justified Not Positively Prepared Not Effective
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
2 Duty to Cooperate. 2.1 Having reviewed the DTC Statement of May 2022, we note that housing is seen in section 4 to be a cross boundary strategic issue and that in terms of the Housing Market and Need the DTC statement concludes:	

'The Local Plan seeks to meet the Local Housing Need figure for Spelthorne. This has informed the Local Plan strategy and the housing trajectory confirms that the borough has identified sufficient land to meet its need over the plan period, contributing to wider strategic housing need. The findings have been discussed with neighbouring authorities at Duty to Cooperate meetings. No authorities have made negative representations about the Local Plan's approach to housing'

2.2 Likewise in terms of Housing Land Availability the DTC statement concludes:

'The collaboration between Spelthorne and Runnymede on a joint SLAA methodology allows for consistency in the assessment of sites and determination of the land supply present across the housing market area. The results of the updated SLAA 2021 have informed the housing trajectory and Local Plan Strategy. Neighbouring authorities have confirmed they are satisfied by the proposed approach in the Local Plan as Spelthorne is planning to meet its development needs in full.'

2.3 In the context of the above we note that Elmbridge Borough Council (EBC) has resolved to pursue a Local Plan strategy that does not meet its housing needs in full, and that through ongoing DTC discussions Spelthorne BC has reiterated to EBC that it should fully examine all options to meet its housing needs in full and that SBC is unable to assist given that the Local Plan strategy being pursued does not include any spare capacity. What is not clear from the DTC statement is whether EBC have made a formal request to SBC to assist them in meeting their unmet needs, as this will impact upon the reasonable alternatives the SA should seek to address when reviewing the housing requirements – see below.

2.4 Clearly the council will have to ensure when it comes to submission that a SoCG is entered into with EBC to demonstrate constructive, active, and ongoing engagement on this matter, and also provide some clarity on how the unmet needs of the HMA are to be addressed in the circumstances. To this end it is noted that whilst Runnymede BC adopted its Local Plan (2030) on the 16 July 2020, work has commenced on a review and that any SoCG with RBC will need, notwithstanding the DTC Statement, to demonstrate how the cross boundary issue of housing land supply and the needs of the housing market area are being addressed so that there is no shortfall.

Please see attached for full response.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Yes, I wish to participate in hearing session(s) A2Dominion Group have an interest in Land at Spelthorne Grove (SC1/021) and Land at Stanwell Bedsits (SN1/012), both of which are proposed allocations in the Pre-submission Spelthorne Local Plan 2022-2037. They are also active elsewhere in the Borough and have an interest in ensuring the legality and soundness of the Local Plan.

They therefore wish me to participate in the examination

<b>Respondent: A2Dominion Group (42324225)</b>
<b>Organisation:</b>

<b>Response ID: 1128132</b>	
<b>Policy / Evidence Base / Part of Plan: Duty to Cooperate</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Not Justified Not Consistent with National Policy
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
General Policy Overview and the Issue of Viability. 5.15 Only in policy ID2 (1(e)) is it made clear that the Infrastructure Delivery Plan (IDP) upon which the plan relies is still forthcoming – whilst obvious from a review the evidence base, the lack of an IDP does call into question how the council have sought to test the requirements they are placing on the proposed allocations and the requirement of policies such as PS1, ID1 and ID2. And thus, highlight's the need for these policies to be caveated in such a way that enables a variation from the policy requirement when compliance is shown to be unviable.	

5.16 In the context of the above, we do note that the Local Plan and potential Community Infrastructure Levy (CIL) Review Viability Assessment (2020 - 22), (July 2022), in reviewing the estimated effects of the potential policy costs emerging from the proposed submission plan (i.e. affordable housing requirements, housing standards (accessibility and adaptability), sustainability requirements, water efficiency requirements, BNG requirements and infrastructure costs), and assuming the continuation of the existing CiL charging costs considers most schemes to be viable. It does however make it clear in section 3 that 30% affordable housing/ the policy requirements of the plan will make some PDL sites challenging (see para 3.3.4), that none of this 'can show exactly how individual sites and scheme viabilities will pan out – it is an overview' (see para 3.3.5) and that:

'This does not mean that sites or types which we have indicated as potentially marginally or non-viable would not come forward at all – they could do, but the signs are that it would most likely be difficult to secure AH / planning obligations on them at other than compromised levels in viability terms (and potentially even were a sub-30% AH headline to be put in place for some site types / locations). In practice a wider range of AH could be seen overall on PDL sites, within say a 30% potentially down to 0% AH range depending on circumstances.'

5.17 Para 3.37 continues:

'It is also worth noting that this is not down to the charging of CIL either – it is more of an inherent issue with a weak relationship between the estimated value and cost of assumed development, with the Existing Use Value based site value assumption (Benchmark Land Value) also playing a significant role in the overall viability indications'.

5.18 We totally concur with the above and note the findings of tables 1a, 1h and 1i of appendix 1 of the Viability Appraisal. We also note that none of the PDL flatted schemes assessed in the Viability Assessment included the two estate regeneration schemes being promoted by A2Dominion Group. These schemes which have to provide for the buying back of existing properties at Open Market Value, and the phased development that allows for the rehousing of existing tenants and private occupants who want to remain have very different EUV than a normal PDL development which is why we believe the proposed policy approach adopted within the submission local plan has to have regard to the viability implications of the requirement and allow for a variation from the policy where it can be demonstrated its not viable to deliver as per the policy requirement

5.19 Para 2.18 of the submission local plan indicates that one of the objectives of the plan is Effective Service Delivery, which includes: Ensuring the Local Plan and its requirements on developers are viable and capable of delivery. Given the above we believe it only fair and reasonable that policies PS1, ID1 and ID2 are caveated as suggested.

To conclude, whilst we support the Reg 19 Plan and the proposed allocation of the land at Spelthorne Grove (site ID SC1/021) and Land at Stanwell Bedsits (site ID SN1/012) for strategic scale redevelopment, we do have a number of concerns about the overall housing supply and trajectory, the rationale behind the assessment of the reasonable alternatives assessed in the Sustainability Appraisal, and alternatives assessed; the wording of policies SC1/021) and SN1/012; and the wording of policies PS1, PS2, H1, H2, ID1 and ID2 and justification for some of the criteria contained therein.

We would however like to highlight A2Dominion Group's desire to continue to work with the Council on the delivery of the proposed strategic allocations at Spelthorne Grove and Stanwell Bedsits and to this end would welcome the opportunity to meet with officers to discuss our comments on the Reg 19 Plan as soon as is practically possible.

We believe that the development of the land at Spelthorne Grove and Stanwell Bedsits can come forward in a timely way, to help accommodate the housing needs of the area and provide tangible benefits for the local community in terms of creation of attractive, well designed places with new homes that are energy and water efficient, enhanced pedestrian and cycle links, reduced flood risk and new / enhanced open space and play facilities. Said development will also provide for a better unit mix, with land at Stanwell replacing the existing bedsits with a mix of one, two, three bedroom apartments, thus creating a more 'mixed and balanced community' and addressing the housing mix deficiencies in the area identified in the GL Hearn 'Planning for Housing Delivery' report, and the redevelopment of the land at Spelthorne Grove also helping to create a more 'mixed and balanced community' whilst also replacing buildings whose fabric is coming to the end of its life and requires replacement. It will also provide much needed affordable housing and in doing so help to reduce the pressure in the borough in terms of Green Belt releases.  
see attached for full rep

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Yes, I wish to participate in hearing session(s) A2Dominion Group have an interest in Land at Spelthorne Grove (SC1/021) and Land at Stanwell Bedsits (SN1/012), both of which are proposed allocations in the Pre-submission Spelthorne Local Plan 2022-2037. They are also active elsewhere in the Borough and have an interest in ensuring the legality and soundness of the Local Plan.

They therefore wish me to participate in the examination



<b>Respondent: A2Dominion Group (42324225)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128133</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Evidence base - IDP	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
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No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
3 The Sustainability Appraisal (SA) 3.1 Chapter 3 of the SA reviews the approach to strategic growth, and in doing so explains the approach adopted at Issues and Options, and Preferred Options that led to the adoption of option 4. Option 4 is described in table 7 as:	

'Increase densities in town centres and near transport facilities where the character can accommodate it, allowing high rise development where appropriate and where they are of high quality design. Release some weakly performing Green Belt that would not adversely affect the integrity of the strategic Green Belt. Make use of a masterplan approach for Staines.'

3.2 Para 3.18 of the SA suggests this was finessed by members wanting to pursue a local plan strategy comprising the following elements:

'• Increasing densities in town centres and near transport facilities and other areas where the character can accommodate it and allowing high rise development in areas where the existing character permits and they are of a high quality design, having regard to the emerging Staines Development Framework.

• A small amount of dispersed Green Belt release for development where its release would not adversely affect the integrity of the strategic Green Belt. Any consideration of the potential release of Green Belt will have due regard for the sustainability of location and the quantity of previously developed land.

• Making use of a development framework for Staines but with housing as one of a range of uses that can be accommodated within the town and not favouring residential development over employment, retail and tourism uses.'

3.3 In reviewing the options considered, it appears that none looked at delivering more/ less than required by the Standard Methodology having regard to the issue of Elmbridge/ London's unmet need, and the level of Green Belt releases required to meet the housing need.

3.4 Chapter 4 of the SA tests the objectives of the plan against the objectives of the SA, which we note include objectives related to community, affordable housing, the environment and service delivery. Chapter 5 then goes on to test the policies of the local plan, with table 12 highlighting the negative, neutral and unknow implications of policy ST2 as being: flood risk; biodiversity, heritage and open space and landscape; and pollution, climate change and water. Having reviewed the more detailed critique in appendix a (p90/91), we note that under food risk the SA suggests that 'Development of some land in flood zones, particularly in Staines, but this will reduce the need to build on the highest risk areas in the Green Belt. .... The borough is severely constrained by flood risk therefore accommodating the proposed level of development can be expected to increase the number of people vulnerable to flood risk. Appropriate layouts and flood mitigation measures are therefore required.'

3.5 As is clear from the above this matter is something that is capable of mitigation and in some urban brownfield redevelopment could actually result in a betterment over the existing where no such mitigation may have been in place to start with – so the scoring of this as a negative is in some respects disingenuous. Likewise, the biodiversity score accepts that the development of sites in the urban area are likely to avoid impacts on biodiversity; that the loss of open spaces and overall impact on the landscape of the borough can be mitigated through sensitive design and layout, including appropriate screening and landscaping; and that the impact on climate change could in terms of the redevelopment of existing buildings, enable the provision of more energy efficient homes. The same could be true of the effects on water conservation as the redevelopment of existing buildings could enable the provision of more water efficient homes.

3.6 We note the SA concludes that policy ST2 is considered to be sustainable with positive impacts on social and economic objectives, and that whilst there is some uncertainty regarding environmental impacts as this is largely associated with how schemes are implemented, flood risk mitigation will help to overcome negative impacts.

3.7 Chapter 6 of the SA goes on to test the proposed site allocations. In noting the score attributed to the Land at Spelthorne Grove (SC1/021) and Land at Stanwell Bedsits (SN1/012), we would comment as follows:

i) Land at Spelthorne Grove

3.8 Table 13 scores the Land at Spelthorne Grove as follows: (as in attached document page 10)

3.9 Having reviewed the more detailed critique of the site as set out in appendix A (p229 /230), we note that in discussing flood risk the assessment suggests that 'The site is mostly within flood zone 2 and there is also a risk of groundwater and surface water flooding. The western part of the site is currently grassed and replacement of this with hardstanding would increase risk of surface water flooding. Introduction of a more vulnerable use to an area at risk of flooding. Permeable surfaces could help to mitigate this'

3.10 Whilst acknowledging the site falls within flood zone 2, its redevelopment, especially the current developed part provides an opportunity to introduce positive flood risk management, which could actively help reduce the flood risk issues in the area.

3.11 In discussing 'open space and landscape' the assessment suggests that 'Part of the site is occupied by a recreation/open space area and impacts would be negative if lost. Various schemes have been identified and if this area is retained or re-provided in the wider site the impacts would be neutral.' As A2Dominion are not looking to develop a scheme that would result in the loss of the existing play space (see below) and will in addition be looking to introduce new high quality, usable and well maintained public open space as part of the estates regeneration, we believe the sites scoring in this regard should be amended accordingly.

3.12 In discussing 'water' the assessment suggests that the 'Proposed use would likely result in additional water consumption and likely knock on impacts on its quality from construction and implementation. Mitigation could be included as part of the development such as the use of water meters and rainwater harvesting.' The redevelopment of this estate, which was built long before energy efficiency and water conservation measures were introduced, actually provides a real betterment. As such, we believe the sites scoring should be amended accordingly.

3.13 As to the SA's assessment of the sites impact on 'pollution', we note that whilst under health, and transport, the site is said to be located within close proximity to local services, in assessing the sites redevelopment on pollution the assessment suggests that 'The proposed developments would result in more people moving around and associated noise impacts. The site is already subject to a significant amount of noise and air pollution due to the proximity to the A308. There is potential for this to be mitigated to an extent through construction however it is unlikely to be fully mitigated due to the number of vehicle movements' and that under the summary the SA says: 'The site is in a sustainable urban location with good links to the local services, in turn bringing about positive impacts on health, housing, transport and land use. The site is urban PDL therefore limited negative impacts are expected on the environment, although exposure to pollution could rise and flood risk mitigation is required.' Under Possible Mitigation it states: 'Mitigation could include flood risk mitigation, permeable surfaces, improved sustainable travel links and planting'

3.14 We fail to see how a site that is located close to local services, and within walking distance of local bus routes and a train station can require improved sustainable travel links, or how given its proximity to such services and facilities it will lead to increased vehicle movements. Indeed, redevelopment provides an ideal opportunity to create a less car dependent development which could integrate an electric car club that could actually bring about real improvements and should be actively encouraged through the planning policy approach to the redevelopment of this site. The provision of car parking in well-connected urban areas such as this needs to be balanced with the capacity of the site to accommodate new homes and create a mixed and balanced community. This again would see the sites scoring in the SA change significantly.

ii) Land at Stanwell Bedsits

3.15 Table 13 scores the Land at Stanwell Bedsits as follows: (page 11 in attached document)

3.16 Having reviewed the more detailed critique of the site as set out in appendix a (p274 /275) we note that in discussing pollution the assessment states: 'All of Spelthorne is an AQMA. Scale of development is likely to increase pollution due to rise in car use and emissions. Site significantly affected by aircraft noise from Heathrow Airport and is within 60-63 Leq contour. Mitigation could be included within the development to reduce the impacts on future occupiers'. We also note that the summary states: Significant housing provision within a previously developed site would help to address local needs, particularly through the provision of affordable housing. The site could improve its access to local services through better sustainable and active travel links, with opportunities to boost local regeneration on a prominent site in the area.; and Possible Mitigation is listed as: 'sustainable construction, improved sustainable travel links and planting.'

3.17 The opportunity to provide for enhanced access to sustainable modes, and provide for cleaner modes of transport – such as an electric car club that could serve the development and a wider area could all help mitigate against the concerns associated with increased car use. Similarly the estate's regeneration could provide for enhanced building techniques that are more energy efficient, water efficient and acoustically insulated, all of which would help address the concerns raised and improve the sites scoring within the SA.

3.18 We would ask that in taking the plan forward for submission the council review the findings of the SA having regard to the above. See attached for full rep and relevant tables.

**Question 6:** You can upload any modifications below.

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They therefore wish me to participate in the examination

<b>Respondent: ABRDN Plc (43071649)</b>
<b>Organisation:</b>

<b>Response ID: 1128268</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS2: Designing places and spaces
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Abrdn is pleased to see the inclusion of the two allocations. They are capable of making a significant contribution toward the delivery of new homes in Spelthorne Borough. Representations Policy PS2 – Designing places and spaces Abrdn is supportive of this catch-all design policy. It sets out a series of sensible criteria for the determination of planning applications. They are part and parcel of the design and masterplanning process and abrdn would seek to follow them in the formulation of any development scheme affecting the two allocated sites. Abrdn is particularly supportive of criterion 7, that which relates to ‘major development and allocated sites.’ It states:

'Given the size, function and proposed density of major developments, particularly those exceeding 50 dwellings, tall buildings and/or allocated sites on former Green Belt land, it may not always be desirable to reflect locally distinct patterns of development. These sites should create their own identity to ensure cohesive and vibrant neighbourhoods. High rise development in appropriate locations will be expected to be supported by a visual impact assessment and demonstrate a positive contribution to the skyline through its architectural merits. In Staines, the Development Framework will provide site specific guidance on the design of larger and tall buildings. On a case-by-case basis, it may be appropriate for larger developments to be shaped by a design panel review process at the applicant's expense, and in conjunction with the Council.'

As highlighted, the two allocated sites (ST4/023 and ST4/024) are capable of delivering major residential development which can contribute significantly towards Spelthorne's housing delivery targets. Any scheme on these sites, particularly ST4/023, would include tall buildings and development of a higher density than that which has traditionally been delivered within Staines town centre. Abrdn therefore sees the inclusion of criterion 7 as being a sensible approach to balancing housing need and maximizing the potential to deliver on sustainable town centre brownfield sites, whilst also achieving good design.

**Question 6:** You can upload any modifications below.

Tombs, Mark [NTR Planning] on behalf of abrdn, Fig 5.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/615905/PDF/-/Tombs%5F%20Mark%20%5FNTR%20Planning%5F%20on%20behalf%20of%20abrdn%5F%20Fig%205%2Epdf>

Tombs, Mark - [NTR Planning] on behalf of abrdn\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618690/PDF/-/Tombs%5F%20Mark%20%2D%20%5FNTR%20Planning%5F%20on%20behalf%20of%20abrdn%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: ABRDN Plc (43071649)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128264</b>	
<b>Policy / Evidence Base / Part of Plan: Policy SP1: Staines-upon-Thames</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
<p>Policy SP1 – Staines-upon-Thames</p> <p>Abrdn is supportive of the recognition of Staines as being a location capable of delivering significant regeneration and growth. We would ask that the section of the draft policy titled ‘Retail and leisure’ be amended to recognise the fast-changing nature of leisure and (particularly) shopping habits. Paragraph 5, in particular, should be amended to reflect the fact that mixed-use development has the potential to introduce not just community and healthcare uses, but also new residential and town centre uses development in a floorspace mix that is representative of demand (mixed-use or otherwise). The reference to community and healthcare uses alone is too narrow and should be expanded upon – see references to the Practice Guidance below.</p>	



Abrdn is supportive of the draft policy's reasoned justification at paragraph 5.5. The paragraph references opportunities to improve public realm and pedestrian linkages throughout the town, and that this presents an opportunity to take advantage of the town's riverside settings. We would argue that such placemaking initiatives be worthy of inclusion in the policy text itself.  
See attached for full rep

**Question 6:** You can upload any modifications below.

Tombs, Mark - [NTR Planning] on behalf of abrdn\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618691/PDF/->

[/Tombs%5F%20Mark%20%2D%20%5FNTR%20Planning%5F%20on%20behalf%20of%20abrdn%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618691/PDF/-/Tombs%5F%20Mark%20%2D%20%5FNTR%20Planning%5F%20on%20behalf%20of%20abrdn%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: ABRDN Plc (43071649)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128267</b>	
<b>Policy / Evidence Base / Part of Plan: Policy EC2: Retail</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
<p>Policy EC2 – Retail and the Pre-Submission Proposals Map</p> <p>This draft policy sets out the retail hierarchy for the borough. Paragraph 6 references the Primary Shopping Areas. These are illustrated on the Pre-Submission Proposals Map. Whilst there appears to be a missing word (uses?) in paragraph 6, it seems to offer for a more flexible mix of uses within Class E. This is supported.</p> <p>Reference is given to residential development on upper floors at paragraph 7, however this appears to relate to existing buildings. Abrdn’s concern is that the policy does not go far enough to support new opportunities for residential development within Staines town centre more generally, and that the Primary Shopping Area (PCA), as illustrated on the Pre-Submission Proposals Map, is too widely drawn and includes edge-of-centre land outside of the retail core. I discuss this point shortly.</p>	

The reasoned justification for the policy references paragraph 86 of the NPPF, which ‘...states that LPAs should set out policies that allow centres to grow and diversify in a way that can respond to rapid changes in retail and leisure industries.’ It is noted, however, that paragraph 86 subsection (f) also states that planning policies should:

‘recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.’

The concern is that Two Rivers North, as allocated under ST4/023, continues to be included as part of the PSA on the Pre-Submission Policies Map. PSAs are defined in Annex 2 of the NPPF as the ‘...area where retail development is concentrated.’ Two Rivers North does not satisfy this definition. Instead it is a peripheral edge-of-centre large format retail warehouse destination, quite some distance from the High Street and the retail core located to the south of Mustard Mill Road and the west of Iron Bridge. This retail core (PSA) is accurately illustrated on Figure 5 of the draft Staines-upon-Thames Town Centre Development Framework, as shown in the extract overleaf.

It is highly unusual for an edge-of-centre retail park to be defined as part of a town’s PSA based on the difference in retail provision (i.e. not serving day-to-day needs). The retail park is a more car-dominated environment with lower footfall than the retail core. These are the ‘local circumstances’ that should be taken into account when determining whether this part of the town centre is PSA or edge-of-centre by definition, as recognised in footnote 62 of the Pre-Submission Local Plan.

The proposed development that abrdn seek for ST4/023 is unlikely to be capable of delivering Class E uses across the board at ground floor level. Abrdn is concerned that the PSA allocation could prevent the delivery of a viable scheme and that any commercial ground floor uses, if these were a prerequisite of the site’s PSA status, could severely stymie the delivery of a viable scheme.

We are mindful that the current development plan recognises a Secondary Shopping Area where a broader range of uses, including residential development (as recognised at subsection (f) of NPPF paragraph 86) can be provided. The Secondary Shopping Area to the east of Iron Bridge, where residential development has successfully been provided, is now allocated as PSA. The area to the east of Iron Bridge is also a peripheral town centre location that is located beyond the retail core.

Abrdn therefore respectfully request that thought be given to Mustard Mill Road and Iron Bridge forming the northern/eastern boundary of a revised PSA.

The draft policy’s reasoned justification picks up on changes to the Use Classes Order and those relatively new permitted development rights (Class MA) and that the Council will seek to retain as many retail units as possible as a result. Abrdn is concerned with this approach and that it cuts across draft allocation ST4/023. It could lead to further long-term vacant retail floorspace, as has happened in the case of the ground floor retail unit at the Premier Inn development, which has never been occupied since the development was completed several years ago, despite significant efforts by abrdn’s marketing agents.

Finally, one is mindful of the ‘key evidence’ listed against the draft policy and that this includes the Town Centre Study of 2015 and Town Centre Study Update of 2018. These two documents are now out-of-date as they precede the Pandemic and the major shift to online shopping. They also precede the

emergence of the Practice Guidance on Town centres and retail, a document that is not referenced as key evidence. Paragraph 001 of the Practice Guidance builds upon paragraph 96 of the NPPF by identifying that:  
'Residential development in particular can play an important role in ensuring the vitality of town centres, giving communities easier access to a range of services.'

It should of course be noted that a captive residential population on the edge of the town centre will increase footfall and increase expenditure to the benefit of the day-to-day services which the High Street and retail core provide, as paragraph 001 of the Practice Guidance alludes to.

In conclusion to the above comments on draft Policy EC2 and the Draft Policies Map, abrdn would suggest they be amended by:

- Making it explicit within the policy that residential development is an inherently sustainable use that is suitable within Spelthorne's hierarchy of centres;
- That any reference to protect retail floorspace is justified by an up-to-date evidence base (as the Council does for residential floorspace); and
- That the boundary of the PSA for Staines town centre does not extend beyond the north of Mustard Mill Road and east of Iron Bridge.

SEE ATTACHED FOR FIG 5

**Question 6:** You can upload any modifications below.

Tombs, Mark [NTR Planning] on behalf of abrdn, Fig 5.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/615903/PDF/-/Tombs%5F%20Mark%20%5FNTR%20Planning%5F%20on%20behalf%20of%20abrdn%5F%20Fig%205%2Epdf>

Tombs, Mark - [NTR Planning] on behalf of abrdn\_Redacted.pdf

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: ABRDN Plc (43071649)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128270</b>	
<b>Policy / Evidence Base / Part of Plan: ST4/023 (Two Rivers Retail Park Terrace, Mustard Mill Road, Staines)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Draft allocation: ST4/023 (Two Rivers Retail Park Terrace, Mustard Mill Road, Staines) Abrdn welcomes the inclusion of draft allocation ST4/023. It follows productive discussions with the Council through its pre-application service in September 2021, following our Call for Sites submission in March 2021. Abrdn has referred to this proposed development along with that for the neighbouring allocation (ST4/024) as the 'Two Rivers Quarter' through its pre-application engagement. The 'Site-Specific requirements' identify the need for a mixed residential and commercial development that provides an active frontage to Mustard Mill Road. The latter is supported by abrdn and provides a much more realistic and commercially viable proposition, particularly as the River Colne frontage, which faces toward Mustard Mill Road, is that which has the most synergy with the commercial core of the town centre located to the south.	

Through a re-alignment of the PSA, as suggested above, along with a recognition given to the benefit that residential development can bring to town centres under Policy EC2, draft allocation ST4/023 is likely to be a more viable proposition and forthcoming in the timescales envisaged in the plan (2028-2032).

As I set out in abrdn's Response Document to the Staines-upon-Thames Town Centre Development Framework Objectives and Options Report in June 2021, the Two Rivers Quarter will seek to provide sufficient scope for adaptable communal and co-working areas that would provide opportunities for home working. In addition, flexible and adaptive ground floor uses are currently proposed to be provided on those frontages facing the River Colne. The quantum and disposition of commercial floorspace will be established through an ongoing assessment of the viability of Two Rivers Quarter. It also continues to be the case, as set out in the Response Document, that commercial floorspace will need to be capable of being flexibly used (e.g. within Class E and other relevant interchangeable uses) and also be capable of conversion to additional residential development if this is where market demand lies in the future.

With the exception of 'Suitable reprovision of shoppers' parking', abrdn is supportive of the Site-specific requirements as well as the opportunities identified in the allocation. The reprovision of shoppers' parking is not something identified for the site in the draft Staines-upon-Thames Town Centre Development Framework – see the list of development principles at paragraph 7.23 of that document, nor the illustrative masterplans at Figures 61 and 62. Indeed, the draft Development Framework makes considerable reference to the site's accessibility and the fact that spare public car parking capacity '...exists across the town.' (paragraph 2.54).

Re-providing shoppers' parking would also be at odds with chapter 9 of the NPPF (titled 'Promoting sustainable transport') and would (a) significantly affect scheme viability and (b) clearly cut across the direction of the draft Staines-upon-Thames Town Centre Development Framework, which identifies Two Rivers North as being a 'car-dominated environment'. The draft Development Framework seeks to address this through being a more pedestrian-friendly part of the town centre making use of its riverside setting. The two are incompatible and so the reference should be removed.

Full rep attached.

**Question 6:** You can upload any modifications below.

Tombs, Mark [NTR Planning] on behalf of abrdn, Fig 5.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/615908/PDF/-/Tombs%5F%20Mark%20%5FNTR%20Planning%5F%20on%20behalf%20of%20abrdn%5F%20Fig%205%2Epdf>

Tombs, Mark - [NTR Planning] on behalf of abrdn\_Redacted.pdf

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: ABRDN Plc (43071649)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128271</b>	
<b>Policy / Evidence Base / Part of Plan: ST4/024 (Frankie &amp; Benny's/Travelodge, Two Rivers, Hale Street, Staines)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Draft allocation: ST4/024 (Frankie & Benny's/Travelodge, Hale Street, Staines) Abrdn welcomes the inclusion of draft allocation ST4/024. This site is proposed to be removed from the Staines Conservation Area, although it will sit upon the conservation area's edge thus making design an important planning consideration. Abrdn supports the site-specific requirements and identified site opportunities set out for the allocation. The site is capable of delivering the quantum of residential units specified and in a high-quality development.	
<b>Question 6: You can upload any modifications below.</b>	
Tombs, Mark - [NTR Planning] on behalf of abrdn_Redacted.pdf	



<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618693/PDF/-/Tombs%5F%20Mark%20%2D%20%5FNTR%20Planning%5F%20on%20behalf%20of%20abrdrn%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: David Adams (33642465)</b>
<b>Organisation:</b>

<b>Response ID: 1117282</b>
<b>Policy / Evidence Base / Part of Plan:</b> No response
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
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No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
No Response
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: David Adams (33642465)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117696</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>My family and I frequently use Echelforde Recreation ground for walking. It is a peaceful area that is enjoyed by the local community, both for walks and celebrations such as this year's Jubilee.</p> <p>Despite appearances, the area is particularly abundant with wildlife. Species observed in the recreation ground, or my neighbouring property, in the past twelve months include:</p> <ul style="list-style-type: none"> <li>• Sparrow hawk eating prey (see attached photograph)</li> <li>• Red kites hunting</li> <li>• Heron</li> <li>• Abundant small bird life</li> </ul>	

- Stable, thriving hedgehog population (see attached photograph)
- Bats
- Toads/frogs
- Newts

Considering the suburban surroundings, this is an astonishingly diverse range of wildlife and should be protected at all costs. I would like to make representation that Echelforde Recreation Ground be considered for Local Green Space status.

**Question 6:** You can upload any modifications below.

IMG\_6575.jpeg

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/586470/PJP/-/IMG%5F6575%2Ejpeg>

Sparrowhawk.jpeg

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/586471/PJP/-/Sparrowhawk%2Ejpeg>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Steve Altria (19694177)</b>
<b>Organisation:</b>

<b>Response ID: 1117101</b>
<b>Policy / Evidence Base / Part of Plan: HS1/002 (Land at Croysdale Avenue/ Hazelwood Drive)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
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No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
I write to confirm my support for the green belt; there is no such thing as “poor performing” green belt. Green belt is green belt and is to be protected therefore. I am particularity against the land as 5. HS1/002 (Land at Croysdale Avenue/ Hazelwood Drive, Sunbury) (1.68ha) for 67 units being built on . Please respect the green belt.
<b>Question 6: You can upload any modifications below.</b>
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Caroline Amey (41902977)</b>	
<b>Organisation:</b> Spelthorne Green Belt Campaign, the Spelthorne Residents Association, the Climate Emergency Centre Talking Tree CIC, It's Our Spelthorne, Residents for Spelthorne (R4s), Extinction Rebellion Staines, Stanwell's Green Lungs, Local Conversation in Stanwell	
<b>Response ID:</b> 1124631	
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Please see attached lengthy document for in-depth representations.	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Please find enclosed our petition against any Green Belt release as part of the Local Plan which has been signed by 6,777 signatories. The petition can be found here: <a href="#">Save our Green Belt in Spelthorne   38 Degrees</a> In short, we are calling on the Council (1) not to amend existing Green Belt boundaries but to leave them untouched and respect residents' clear wishes not to release Green Belt, (2) not to make a pro-active case for Green belt release in its draft Local Plan and not to declare that there are "exceptional circumstances" to justify Green Belt release,	



We also wish to make clear that we categorically reject the Council's classification of Green belt areas as "weakly performing" as well the criteria invented to justify such classification which fail to reflect all the provisions on Green Belt protection in para.138 of the NPPF. All Green Belt sites perform one or more important function by merely existing including checking the unrestricted sprawl of large built up areas, preventing neighbouring towns from merging into one another, assisting in safeguarding the countryside from encroachment, preserving the setting and special character of historic towns; and – extremely importantly - assisting in urban regeneration, by encouraging the recycling of derelict and other urban land (para.138 of the National Planning Policy Framework). All Green Belt is of considerable importance and should not be released.

We note that release of Green Belt is also inconsistent with the Council's declaration of a Climate Emergency.

The petition is supported by the following organisations (in addition to individual signatories): the Spelthorne Residents Association, Talking Tree CIC, It's Our Spelthorne, Residents for Spelthorne (R4s), Extinction Rebellion Staines, Stanwell's Green Lungs, Local Conversation in Stanwell, Runnymede Greenpeace and the North Surrey Green Party.

82. It should be obvious: it is not by releasing Green Belt that one protects Green Belt. The Council's strategy is a recipe for disaster, it opens Pandora's box and presents an ongoing slippery slope to continuing and ongoing damage to our important Metropolitan Green Belt.

83. This is a Council tasked to represent all residents and funded by residents – and it is failing them by not presenting a Local Plan that is based on residents' wishes (e.g. as expressed in petitions and in widespread resident responses to the Consultations).

84. What the Council is really doing is representing and promoting the interests of developers, not of residents. What the Council should be doing, especially during the Climate Emergency, is to put its resources behind a truly democratic and sustainable Local Plan that respects existing Green Belt boundaries, justifies lower housing need figures across the whole Borough, and present a vision of Spelthorne that represents residents' wishes. But it simply has no political will to do so.

Please see attached lengthy document for in-depth representations.

**Question 6:** You can upload any modifications below.

Green Belt petition signatories 1.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/603811/PDF/-/Green%20Belt%20petition%20signatories%201%2Epdf>

Submission re reg 19 consultation 21.9.22.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/603812/PDF/-/Submission%20re%20reg%2019%20consultation%2021%2E9%2E22%2Epdf>

Green Belt petition signatories 2.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/603813/PDF/-/Green%20Belt%20petition%20signatories%202%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Caroline Amey (41902977)</b>	
<b>Organisation:</b> Spelthorne Green Belt Campaign, the Spelthorne Residents Association, the Climate Emergency Centre Talking Tree CIC, It's Our Spelthorne, Residents for Spelthorne (R4s), Extinction Rebellion Staines, Stanwell's Green Lungs, Local Conversation in Stanwell	
<b>Response ID:</b> 1115620	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>I have always advocated the benefits of outdoor space. This was highlighted in the recent pandemic when people recognised how good it is to have green space to enjoy. The lack of it to those in intensive housing, such as flats with none, was deeply felt by those residents. Also, it has been proved that the world needs these open spaces to help protect the environment from ever-increasing pollution.</p> <p>I have no scientific experience but know what benefit it is to me, an active pensioner to be out in our lovely green spaces. Please help to protect them for us all.</p> <p>FURTHERMORE from Spelthorne Green Belt Campaign as an organisation (both from same email address): LGS designation for Grounds of Sunbury Court</p>	

Please find herewith the enclosures to our joint submission on the Local Plan's Green Spaces such as the LGS application regarding Sunbury Court (which has been referred to in the joint submissions).

This joint submission by the Spelthorne Green Belt Campaign, the Spelthorne Residents Association, the Climate Emergency Centre Talking Tree CIC, It's Our Spelthorne, Residents for Spelthorne (R4s), Extinction Rebellion Staines, Stanwell's Green Lungs, Local Conversation in Stanwell and Runnymede Greenpeace addresses Spelthorne Borough Council's approach and policy regarding the designation of urban green spaces as Local Green Spaces.

We are fully supportive of the list of sites that the Council has accepted should be taken forward and designated as Local Green Spaces and agree that these sites meet the criteria as Local Green Spaces (see section 2 of Spelthorne Borough Council's 'Local Green Space Review of submitted spaces' of January 2022).

We do, however, take issue with substantial parts of the Council's proposed methodology regarding the designation of Local Green Spaces (Local Green Space Assessment Methodology of October 2019) as well as the refusal reasons given by the Council in its 'Local Green Space Review of submitted spaces' (of January 2022).

For the reasons set out below, we believe that both the Methodology and its application breach the NPPF and are in conflict with Government Guidance. We are also concerned that the Council has not treated all of the NPPF's criteria for designation as Local Green Spaces equally, has employed blanket refusal grounds in relation to certain types or classification of green spaces and, as a result, has failed to treat all nominated sites equally and equitably. Issue is taken in particular with the Council's blanket exclusion/refusal grounds and failure to carry out individual assessments against LGS criteria of at least 43 sites on the basis that the sites were e.g. larger than 10ha (refusal reason for five nominated sites), are Green belt sites (19 sites), allotments (three sites), private playing fields (four sites) or school grounds (12 sites).

For the reasons set out in these submissions, we are of the view that the Council Methodology and its application to site assessments is deeply flawed in the examples given below and, in respect of the sites that were rejected for LGS designation, these render the Local Plan unsound.

Please see attached supporting documents and in depth reps.

**Question 6:** You can upload any modifications below.

History of Sunbury Court Salvation army.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589213/PDF/-/History%20of%20Sunbury%20Court%20Salvation%20army%2Epdf>

Local Green Space petition signatories.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589214/PDF/-/Local%20Green%20Space%20petition%20signatories%2Epdf>

Submission to Local Plan Consultation.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589215/PDF/-/Submission%20to%20Local%20Plan%20Consultation%2Epdf>

SUNBURY COURT, MAP.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589216/PDF/-/SUNBURY%20COURT%5F%20MAP%2Epdf>

Sunbury Court Island Village Matters.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589217/PDF/-/Sunbury%20Court%20Island%20Village%20Matters%2Epdf>

Site Assessment Pro-forma Sunbury Court - redacted.docx

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618988/DOCX/-/Site%20Assessment%20Pro%2Dforma%20Sunbury%20Court%20%2D%20redacted%2Edocx>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Sarah Andrews (41977441)</b>
<b>Organisation:</b>

<b>Response ID: 1117120</b>
<b>Policy / Evidence Base / Part of Plan: ST1/043 (Land East of 355 London Road)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
I have newly moved to Staines. I chose Staines as the town to buy my first property in due to the area - the large green spaces, the great river walks, the walks by the marsh, the general safe feeling I get by walking alone through the town. I am sadden to hear of the plans for amending the Green Belt Boundaries in Staines and the surrounding areas. I OBJECT to the council trying to amend the existing Green Belt boundaries and to respect them. I OBJECT to some parts of your emerging local plan for 2022-2037. There is no human justifiable reason to release the green belt to developers. You are doing this only for profit which is a disgrace. In lockdown, if we did not have these green belt areas and all the free, green space your county would have a lot higher mental health rates and suicide.

I State that I categorically reject the Council's classification of certain Green belt areas as "weakly performing" as well as the criteria invented to justify such classification. All Green Belt sites perform one or more important function by merely existing including checking the unrestricted sprawl of large built up areas, preventing neighbouring towns from merging into one another, assisting in safeguarding the countryside from encroachment, preserving the setting and special character of historic towns; and – extremely importantly - assisting in urban regeneration, by encouraging the recycling of derelict and other urban land (para.138 of the National Planning Policy Framework). All Green Belt is of considerable importance, is valued by residents and should remain protected.

I also want my disappointment that the Council has also refused to designate 19 Green Belt areas (that were proposed by residents) as Local Green spaces noted.

Personally - 13. ST1/043 (Land East of 355 London Road, Staines) (0.27 ha) for 3 traveller pitches - is a major concern of mine. Traveller pitches are a safety concern and as a single female i would not want this anywhere near my home. I won't feel safe walking near here, which this is on my weekend walking route. It's a pretty peaceful walk and now this plan would ruin my peace and put me in fear for my safety. Traveller sites notoriously mean more crime - WHY ON EARTH WOULD YOU WANT TO DESTROY PRECIOUS GREEN BELT LAND TO INCREASE CRIME - the only rationale reason is for profit.

I urge you to stop thinking of your profits and do not release these arears of green belt to any developer.

From an environmental point of view, destroying the local environment I also object too.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Angle Property (43059489)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128145</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST1: Presumption in Favour of Sustainable Development	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>On behalf of our client, Angle Property, we write to you to make representations in respect of the Regulation 19 consultation on the Pre-submission Spelthorne Local Plan 2022 – 2037. These representations relate to Land at Croysdale Avenue, also known as Hazelwood Drive, which is owned by our client.</p> <p>Angle Property is generally supportive of the draft Local Plan and its approach, whereby the Council proposes to remove the site from the Green Belt and allocate the site for residential development. Our client is currently undertaking pre-application engagement with Officers at the Council to bring forward proposals that deliver on the aspirations of the site allocation and to make a valuable contribution to the Council’s housing requirements in the short term.</p> <p>Policy ST1: Presumption in Favour of Sustainable Development</p> <p>Policy ST1 explains that the Council is planning to deliver 9,270 homes over the Plan period (or 618 homes per year) which satisfies the objectively assessed need with reference to the Government’s standard methodology for housing need. In planning for this amount of growth, the Council’s approach is consistent with national policy which seeks to significantly boost the supply of homes where these are needed (NPPF Paragraph 60) and for</p>	



the standard method to be applied to determine the number of homes needed in a Local Plan (NPPF Paragraph 61). We support the Council's approach to meet objectively assessed needs. This is important to demonstrate that the Plan is positively prepared, which is a key soundness matter. We also note that to achieve the objectively assessed need the Council has put forward a case of exceptional circumstances to remove land in the Green Belt through amending the current boundaries through adoption of the Plan. The Council's published topic paper (Topic Paper 1, published 25 July 2022) concludes that housing in the Green Belt is necessary to meet needs in full and to deal with historic under delivery in past years which has resulted in the Council being a 'presumption authority'. Further, the Council has concluded that the sites selected for allocation are least harmful in Green Belt terms and would deliver the most benefit to satisfactorily outweigh any harms. In our previous representations we have explained that Green Belt release is fundamentally required in the context of the severe housing challenges the Borough faces. Within this context, Policy ST1 (part 2) makes clear that applications which accord with the Plan will be approved without delay, unless material considerations indicate otherwise. Implicitly therefore applications for development on sites allocated for development, including those being removed from the Green Belt, will be supported as a matter of principle. We support this approach which is unambiguous and a demonstration that the Council is looking to accommodate development where this aligns with the emerging spatial strategy.

Spelthorne Local Plan Green Belt Assessment Stage 3 Report

In July 2022 the Council published further evidence on Green Belt sites in the Stage 3 Report, which provides a 'finer grain' assessment of Green Belt sites proposed for removal in the draft Plan against Green Belt purposes and each site's role in the strategic function of the wider Green Belt.

The Stage 3 Report concludes that Hazelwood Drive is weakly performing / less important for retention in the Green Belt. The Stage 3 Report also explains that:

- The site plays a less important role when compared to the wider Green Belt parcel;
- Due to the contained nature of the sub-area, its removal would be unlikely to alter the performance of the adjoining Green Belt;
- The small scale and location of the site within the wider Green Belt would have little impact on the surrounding sub-areas and would maintain physical and perceptual distance between settlements; and
- The removal of the site from the Green Belt is unlikely to impact the performance of the wider Green Belt.

We support these conclusions, which are consistent with the findings of the previous Stage 2 assessment which led to the Council proposing to remove the site from the Green Belt. This is another demonstration of the site's poor performance as a Green Belt site, which is clearly of limited strategic importance that does not warrant its retention in the Green Belt in light of the housing land requirement.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

160922 Hazelwood Drive - Redacted Reg 19 Reps ISSUE, Angle Property.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/617170/PDF/-/160922%20Hazelwood%20Drive%20%2D%20Redacted%20Reg%2019%20Reps%20ISSUE%5F%20Angle%20Property%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Angle Property (43059489)</b>	
Organisation:	
<b>Response ID: 1128140</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>On behalf of our client, Angle Property, we write to you to make representations in respect of the Regulation 19 consultation on the Pre-submission Spelthorne Local Plan 2022 – 2037. These representations relate to Bugle Nurseries which is owned by our client.</p> <p>Policy ST2 then outlines how the housing requirement will be met over the Plan period and identifies that proposed site allocations will yield 6,073 homes, of which 5244 homes will be delivered in the urban area, with 829 homes coming from sites in the Green Belt. Bugle Nurseries is included within this source of supply, which is supported by our client and a reflection that the site is appropriate for release from the Green Belt and will contribute to the Council’s housing land supply.</p>	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	
<b>Question 6:</b> You can upload any modifications below.	
160922 Bugle Nurseries - Redacted Reg 19 Reps ISSUE, Angle Property.pdf	

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/617162/PDF/-/160922%20Bugle%20Nurseries%20%2D%20Redacted%20Reg%2019%20Reps%20ISSUE%5F%20Angle%20Property%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Angle Property (43059489)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128142</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>On behalf of our client, Angle Property, we write to you to make representations in respect of the Regulation 19 consultation on the Pre-submission Spelthorne Local Plan 2022 – 2037. These representations relate to Land at Croysdale Avenue, also known as Hazelwood Drive, which is owned by our client.</p> <p>Angle Property is generally supportive of the draft Local Plan and its approach, whereby the Council proposes to remove the site from the Green Belt and allocate the site for residential development. Our client is currently undertaking pre-application engagement with Officers at the Council to bring forward proposals that deliver on the aspirations of the site allocation and to make a valuable contribution to the Council’s housing requirements in the short term.</p> <p>Policy ST2: Planning for the Borough</p> <p>Policy ST2 then outlines how the housing requirement will be met over the Plan period and identifies that proposed site allocations will yield 6,073 homes, of which 5244 homes will be delivered in the urban area, with 829 homes coming from sites in the Green Belt. Hazelwood Drive is included within</p>	

this source of supply, which is welcomed by our client and a reflection that the site is appropriate for release from the Green Belt and will contribute to the Council's housing land supply.  
See attached for full response.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

160922 Hazelwood Drive - Redacted Reg 19 Reps ISSUE, Angle Property.pdf

[https://spelthorne.inconsult.uk/gf2.ti/af/1409506/619751/PDF/-/160922%20Hazelwood%20Drive%20-%20Redacted%20Reg%2019%20Reps%20ISSUE\\_%20Angle%20Property.pdf](https://spelthorne.inconsult.uk/gf2.ti/af/1409506/619751/PDF/-/160922%20Hazelwood%20Drive%20-%20Redacted%20Reg%2019%20Reps%20ISSUE_%20Angle%20Property.pdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Angle Property (43059489)</b>
<b>Organisation:</b>

<b>Response ID: 1128143</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
See attached full rep. On behalf of our client, Angle Property, we write to you to make representations in respect of the Regulation 19 consultation on the Pre-submission Spelthorne Local Plan 2022 – 2037. These representations relate to Land at Croysdale Avenue, also known as Hazelwood Drive, which is owned by our client. Angle Property is generally supportive of the draft Local Plan and its approach, whereby the Council proposes to remove the site from the Green Belt and allocate the site for residential development. Our client is currently undertaking pre-application engagement with Officers at the Council to bring forward proposals that deliver on the aspirations of the site allocation and to make a valuable contribution to the Council’s housing requirements in the short term. Policy ID2: Sustainable Transport for New Developments Policy ID2 is a strategic policy targeting sustainable transport measures in development. Part 1 of the policy states the new developments will be need to incorporate opportunities to facilitate sustainable and active modes of travel and lists several requirements, including: • Provision of, or contribution towards, the improvement of public and community transport;

- Providing improvements to or contributions towards improving the capacity and security of cycle parking at the Borough's public transport interchanges; and
- Providing funding to deliver highways improvements to support the spatial strategy.

The current policy is ambitious, but we conclude it is not reasonable and too onerous. Obviously the Council can only seek proportionate contributions that are necessary to make development acceptable in planning terms. Clearly not all individual development sites can be expected to fund bus and rail services which is a strategic issue. This could have the unintended consequence of making development unviable and this must be reviewed by the Council.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

160922 Hazelwood Drive - Redacted Reg 19 Reps ISSUE, Angle Property.pdf

[https://spelthorne.inconsult.uk/gf2.ti/af/1409506/619752/PDF/-/160922%20Hazelwood%20Drive%20-%20Redacted%20Reg%2019%20Reps%20ISSUE\\_%20Angle%20Property.pdf](https://spelthorne.inconsult.uk/gf2.ti/af/1409506/619752/PDF/-/160922%20Hazelwood%20Drive%20-%20Redacted%20Reg%2019%20Reps%20ISSUE_%20Angle%20Property.pdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Angle Property (43059489)</b>
<b>Organisation:</b>

<b>Response ID: 1128144</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
On behalf of our client, Angle Property, we write to you to make representations in respect of the Regulation 19 consultation on the Pre-submission Spelthorne Local Plan 2022 – 2037. These representations relate to Bugle Nurseries which is owned by our client. Policy ST1 explains that the Council is planning to deliver 9,270 homes over the Plan period (or 618 homes per year) which satisfies the objectively assessed need with reference to the Government’s standard methodology for housing need. In planning for this amount of growth, the Council’s approach is consistent with national policy which seeks to significantly boost the supply of homes where these are needed (NPPF Paragraph 60) and for the standard method to be applied to determine the number of homes needed in a Local Plan (NPPF Paragraph 61). We support the Council’s approach to meet objectively assessed needs. This is important to demonstrate that the Plan is positively prepared, which is a key soundness matter. We also note that to achieve the objectively assessed need the Council has put forward a case of exceptional circumstances to remove land in the Green Belt through amending the current boundaries through adoption of the Plan.

The Council's published topic paper (Topic Paper 1, published 25 July 2022) concludes that housing in the Green Belt is necessary to meet needs in full and to deal with historic under delivery in past years which has resulted in the Council being a 'presumption authority'. Further, the Council has concluded that the sites selected for allocation are least harmful in Green Belt terms and would deliver the most benefit to satisfactorily outweigh any harms. In our previous representations we have explained that Green Belt release is fundamentally required in the context of the severe housing challenges the Borough faces.

Within this context, Policy ST1 (part 2) makes clear that applications which accord with the Plan will be approved without delay, unless material considerations indicate otherwise. Implicitly therefore applications for development on sites allocated for development, including those being removed from the Green Belt, will be supported as a matter of principle. We support this approach which is unambiguous and a demonstration that the Council is looking to accommodate development where this aligns with the emerging spatial strategy.

Spelthorne Local Plan Green Belt Assessment Stage 3 Report

In July 2022 the Council published further evidence on Green Belt sites in the Stage 3 Report, which provides a 'finer grain' assessment of Green Belt sites proposed for removal in the draft Plan against Green Belt purposes and each site's role in the strategic function of the wider Green Belt.

The Stage 3 Report concludes that whilst Bugle Nurseries as a land parcel performs a role for the performance and integrity of the Green Belt, it includes a high percentage of previously developed land and offers opportunity for significant mitigation through green infrastructure enhancement and creating publicly accessible green space on the site.

The Stage 3 Report also explains that the proposed allocation on the south eastern area of the site would help preserve the role of the Green Belt and help to maintain separation between Upper Halliford and Sunbury and there are opportunities to enhance the landscape to minimise views of the railway and increase connections to the wider countryside to the west.

We support these conclusions, which are consistent with the findings of the previous Stage 2 assessment which led to the Council proposing to remove the site from the Green Belt. This is another demonstration of the site's poor performance as a Green Belt site, which is clearly of limited strategic importance that does not warrant its retention in the Green Belt in light of the housing land requirement.

See attached document for full response.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

160922 Bugle Nurseries - Redacted Reg 19 Repls ISSUE, Angle Property.pdf

<https://spelthorne.inconsult.uk/gf2.ti/af/1409506/619753/PDF/-/160922%20Bugle%20Nurseries%20-%20Redacted%20Reg%2019%20Repls%20ISSUE%20Angle%20Property.pdf>



<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Angle Property (43059489)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128146</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS2: Designing places and spaces	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>On behalf of our client, Angle Property, we write to you to make representations in respect of the Regulation 19 consultation on the Pre-submission Spelthorne Local Plan 2022 – 2037. These representations relate to Bugle Nurseries which is owned by our client.</p> <p>Policy PS2 sets out the Council’s overarching policy to design. We have no observations on the policy objectives which are reasonable in targeting high quality development in Spelthorne. Part 7 of Policy PS2 relates to developments exceeding 50 dwellings on former Green Belt land. It is flexibly worded to accept that on such sites it may not always be desirable to reflect locally distinct patterns of development and instead such sites should create their own identity to ensure cohesive and vibrant neighbourhoods. We welcome and support this policy approach.</p> <p>This policy however seeks to introduce a requirement for developments to go before a design review panel. In our view this is onerous for certain sites that are recommended for allocation, whereby the allocations identify a development area and appropriate site capacity for the respective sites. In our</p>	

view the requirement for a design review panel must remain optional and not mandatory, and generally to be reserved for development sites where a third party assessment of a scheme is required to determine what constitutes an appropriate response for the site. We suggest this element of the policy is removed.

See attached document for full rep.

**Question 6:** You can upload any modifications below.

160922 Bugle Nurseries - Redacted Reg 19 Reps ISSUE, Angle Property.pdf

[https://spelthorne.inconsult.uk/gf2.ti/af/1409506/619756/PDF/-/160922%20Bugle%20Nurseries%20-%20Redacted%20Reg%2019%20Reps%20ISSUE\\_%20Angle%20Property.pdf](https://spelthorne.inconsult.uk/gf2.ti/af/1409506/619756/PDF/-/160922%20Bugle%20Nurseries%20-%20Redacted%20Reg%2019%20Reps%20ISSUE_%20Angle%20Property.pdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Angle Property (43059489)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128147</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy SP2: Ashford, Shepperton and Sunbury Cross	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>On behalf of our client, Angle Property, we write to you to make representations in respect of the Regulation 19 consultation on the Pre-submission Spelthorne Local Plan 2022 – 2037. These representations relate to Land at Croysdale Avenue, also known as Hazelwood Drive, which is owned by our client.</p> <p>Angle Property is generally supportive of the draft Local Plan and its approach, whereby the Council proposes to remove the site from the Green Belt and allocate the site for residential development. Our client is currently undertaking pre-application engagement with Officers at the Council to bring forward proposals that deliver on the aspirations of the site allocation and to make a valuable contribution to the Council’s housing requirements in the short term.</p> <p>Policy ST2: Planning for the Borough</p> <p>Policy ST2 then outlines how the housing requirement will be met over the Plan period and identifies that proposed site allocations will yield 6,073 homes, of which 5244 homes will be delivered in the urban area, with 829 homes coming from sites in the Green Belt. Hazelwood Drive is included within</p>	

this source of supply, which is welcomed by our client and a reflection that the site is appropriate for release from the Green Belt and will contribute to the Council's housing land supply.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

160922 Hazelwood Drive - Redacted Reg 19 Repl ISSUE, Angle Property.pdf

[https://spelthorne.inconsult.uk/gf2.ti/af/1409506/619755/PDF/-/160922%20Hazelwood%20Drive%20-%20Redacted%20Reg%2019%20Repl%20ISSUE\\_%20Angle%20Property.pdf](https://spelthorne.inconsult.uk/gf2.ti/af/1409506/619755/PDF/-/160922%20Hazelwood%20Drive%20-%20Redacted%20Reg%2019%20Repl%20ISSUE_%20Angle%20Property.pdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Angle Property (43059489)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128148</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ID2: Sustainable Transport for New Developments	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>Policy ID2 is a strategic policy targeting sustainable transport measures in development. Part 1 of the policy states the new developments will be need to incorporate opportunities to facilitate sustainable and active modes of travel and lists several requirements, including:</p> <ul style="list-style-type: none"> <li>• Provision of, or contribution towards, the improvement of public and community transport;</li> <li>• Providing improvements to or contributions towards improving the capacity and security of cycle parking at the Borough’s public transport interchanges; and</li> <li>• Providing funding to deliver highways improvements to support the spatial strategy.</li> </ul> <p>The current policy is ambitious, but we conclude it is not reasonable and too onerous. Obviously the Council can only seek proportionate contributions that are necessary to make development acceptable in planning terms. Clearly not all individual development sites can be expected to fund bus and rail</p>	



services which is a strategic issue. This could have the unintended consequence of making development unviable and this must be reviewed by the Council.

See attached document for full rep.

**Question 6:** You can upload any modifications below.

160922 Bugle Nurseries - Redacted Reg 19 Repts ISSUE, Angle Property.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619757/PDF/->

[/160922%20Bugle%20Nurseries%20%2D%20Redacted%20Reg%2019%20Reps%20ISSUE%5F%20Angle%20Property%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619757/PDF/-/160922%20Bugle%20Nurseries%20%2D%20Redacted%20Reg%2019%20Reps%20ISSUE%5F%20Angle%20Property%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Angle Property (43059489)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128152</b>	
<b>Policy / Evidence Base / Part of Plan: HS1/002 (Land at Croysdale Avenue/ Hazelwood Drive)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
<p>On behalf of our client, Angle Property, we write to you to make representations in respect of the Regulation 19 consultation on the Pre-submission Spelthorne Local Plan 2022 – 2037. These representations relate to Land at Croysdale Avenue, also known as Hazelwood Drive, which is owned by our client.</p> <p>Angle Property is generally supportive of the draft Local Plan and its approach, whereby the Council proposes to remove the site from the Green Belt and allocate the site for residential development. Our client is currently undertaking pre-application engagement with Officers at the Council to bring forward proposals that deliver on the aspirations of the site allocation and to make a valuable contribution to the Council’s housing requirements in the short term.</p> <p>Site HS1/002 – Land at Croysdale Avenue/Hazelwood Drive</p>	

Our client has engaged with the Council in preparation of its Local Plan and emerging proposals to release the site from the Green Belt for housing development. This has culminated in draft Site Allocation HS1/002 which proposes that the site be developed for approximately 67 homes. An extract is provided below: (see attached, page 4)

We support the allocation of this site and its proposed removal from the Green Belt.

In response to the above we have carried out further analysis to determine how the site could be developed in accordance with the emerging Local Plan allocation. This has included pre-application engagement with the LPA to discuss more detailed proposals for the development of 67 new homes in the form of 1, 2, 3 and 4 bedroom units with associated landscape areas and footpath links. An extract is provided below: (page 5 of document)

The additional feasibility work has demonstrated exactly how the Site could be developed in an appropriate way that would deliver the above benefits whilst according in full with the emerging Local Plan policy objectives as follows: (table on page 6 of document).

Accordingly we fully support the allocation of the site as presented and have confirmed that all of the emerging policy objectives are viable and deliverable.

Please see attached document for full response.

**Question 6:** You can upload any modifications below.

160922 Hazelwood Drive - Redacted Reg 19 Repts ISSUE, Angle Property.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619761/PDF/->

[/160922%20Hazelwood%20Drive%20%2D%20Redacted%20Reg%2019%20Reps%20ISSUE%5F%20Angle%20Property%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619761/PDF/-/160922%20Hazelwood%20Drive%20%2D%20Redacted%20Reg%2019%20Reps%20ISSUE%5F%20Angle%20Property%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Angle Property (43059489)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128153</b>	
<b>Policy / Evidence Base / Part of Plan: HS1/009 (Bugle Nurseries, Upper Halliford Road)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Site Allocation (Years 1-5) Site HS1/009 – Bugle Nurseries, Upper Halliford Road Bugle Nurseries benefits from an extant planning permission, approved in July 2021 (20/00123/OUT) for 31 homes on the eastern part of the site comprising previously developed land. The extant scheme would provide a band of housing development to link the existing housing areas to the north and south of the site, together with an area of public open space for the remaining western part of the site. The scheme was not supported by the LPA at the application stage and was approved at appeal.	

Since this approval our client has engaged with the Council in preparation of its Local Plan on an alternative form of development that would rebalance the brownfield and greenfield parts of the site with the aim of creating a more coherent urban form where:

- 1) New housing would relate better to the extent of the built up area to the south; and
- 2) A durable boundary to undeveloped Green Belt is formed by safeguarding a gap to the built up area north of the site that would be continuous with public open space to the west.

This has culminated in draft Site Allocation HS1/009 which proposes an alternative form of housing development to comprise approximately 79 units (houses and flats) including 50% affordable housing on 2.28ha (Part A) and provision of 4.83ha public open space that would include a minimum 50m gap between new housing development and the built up area to the north (Part B). An extract is provided below: Please see attached document.

In response to the above we have carried out further analysis to determine how the site could be developed in accordance with the emerging Local Plan allocation. This has included pre-application engagement with the LPA to discuss more detailed proposals for the development of 80 new homes in the form of 1, 2, 3 and 4 bedroom units to comprise houses and maisonette flats contained by a primary access road that would establish a boundary to 4.83 ha of public open space including a minimum 50m separation to the built up area to the north. An extract is provided below: Please see attached document.

The proposed response to the emerging Site Allocation would deliver the following benefits:

- Achieving the Council's preference for a more coherent form of development that would establish a durable boundary to better quality, undeveloped Green Belt that would be publicly accessible.
- Early delivery of 80 housing units through the progression of detailed proposals that would help remedy the Council's housing supply shortfall in the short term.
- Provision of market and affordable housing (50%) in line with draft Policy H2 to include 75% affordable rent and 25% first homes that would meet identified needs and provide a balance to higher density development planned in other parts of the Borough.
- It would not be necessary to progress the scheme approved at appeal which was not supported by the LPA and does not meet the objectives of the emerging application.

The additional feasibility work has demonstrated exactly how the Site could be developed in an appropriate way that would deliver the above benefits whilst according in full with the emerging Local Plan policy objectives as follows: Please see attached document.

Accordingly we fully support the allocation of the site as presented and have confirmed that all of the emerging policy objectives are viable and deliverable.

Housing Trajectory and Five Year Housing Land Supply The Council published its Housing Trajectory and Five Year Housing Land Supply Statement in August 2022.

This Statement identifies the Council's five year housing land supply. It is incumbent on the Council to put forward a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against the housing requirement. The Council's supply relies on Regulation 19 Green Belt

sites to deliver a five year supply, which includes Bugle Nurseries. Table 5 confirms that the site will yield 79 units (the quantum identified in the site allocation) in years 1-5 of the Plan period.

Our client has already commenced pre-application discussions with the Council on a scheme that complies with the draft allocation and will be in a position to make a fully documented planning application in the autumn that will enable delivery of the emerging policy objectives. We have therefore put forward extensive evidence to confirm the site is deliverable within the first five years of the Plan and fully support inclusion of the Site within the Council's five year housing land supply.

Please see attached document for full response.

**Question 6:** You can upload any modifications below.

160922 Bugle Nurseries - Redacted Reg 19 Repts ISSUE, Angle Property.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619754/PDF/->

[/160922%20Bugle%20Nurseries%20%2D%20Redacted%20Reg%2019%20Reps%20ISSUE%5F%20Angle%20Property%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619754/PDF/-/160922%20Bugle%20Nurseries%20%2D%20Redacted%20Reg%2019%20Reps%20ISSUE%5F%20Angle%20Property%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Angle Property (43059489)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128149</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Evidence base - Housing Trajectory / 5YHLS	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>In reference to Bugle Nurseries.</p> <p>Housing Trajectory and Five Year Housing Land Supply</p> <p>The Council published its Housing Trajectory and Five Year Housing Land Supply Statement in August 2022. This Statement identifies the Council's five year housing land supply. It is incumbent on the Council to put forward a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against the housing requirement. The Council's supply relies on Regulation 19 Green Belt sites to deliver a five year supply, which includes Bugle Nurseries. Table 5 confirms that the site will yield 79 units (the quantum identified in the site allocation) in years 1-5 of the Plan period. Our client has already commenced pre-application discussions with the Council on a scheme that complies with the draft allocation and will be in a position to make a fully documented planning application in the autumn that will enable delivery of the emerging policy objectives. We have therefore</p>	

put forward extensive evidence to confirm the site is deliverable within the first five years of the Plan and fully support inclusion of the Site within the Council's five year housing land supply.  
See attached document for full rep.

**Question 6:** You can upload any modifications below.

160922 Bugle Nurseries - Redacted Reg 19 Repts ISSUE, Angle Property.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/617160/PDF/->

[/160922%20Bugle%20Nurseries%20%2D%20Redacted%20Reg%2019%20Reps%20ISSUE%5F%20Angle%20Property%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/617160/PDF/-/160922%20Bugle%20Nurseries%20%2D%20Redacted%20Reg%2019%20Reps%20ISSUE%5F%20Angle%20Property%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Angle Property (43059489)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128150</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Evidence base - Housing Trajectory / 5YHLS	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: yes	Additional Comments: yes
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: yes	Additional Comments: yes
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
On behalf of our client, Angle Property, we write to you to make representations in respect of the Regulation 19 consultation on the Pre-submission Spelthorne Local Plan 2022 – 2037. These representations relate to Land at Croysdale Avenue, also known as Hazelwood Drive, which is owned by our client. Angle Property is generally supportive of the draft Local Plan and its approach, whereby the Council proposes to remove the site from the Green Belt and allocate the site for residential development. Our client is currently undertaking pre-application engagement with Officers at the Council to bring forward proposals that deliver on the aspirations of the site allocation and to make a valuable contribution to the Council’s housing requirements in the short term.	
Housing Trajectory and Five Year Housing Land Supply	

The Council published its Housing Trajectory and Five Year Housing Land Supply Statement in August 2022. This Statement identifies the Council's five year housing land supply. It is incumbent on the Council to put forward a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against the housing requirement. The Council's supply relies on Regulation 19 Green Belt sites to deliver a five year supply, which includes Hazelwood Drive. Table 5 confirms that the site will yield 67 units (the quantum identified in the site allocation) in years 1-5 of the Plan period. Our client has already commenced pre-application discussions with the Council on a scheme that complies with the draft allocation and will be in a position to make a fully documented planning application in the autumn that will enable delivery of the emerging policy objectives. We have therefore put forward extensive evidence to confirm the site is deliverable within the first five years of the Plan and fully support inclusion of the Site within the Council's five year housing land supply.

**Question 6:** You can upload any modifications below.

160922 Hazelwood Drive - Redacted Reg 19 Repts ISSUE, Angle Property.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/617161/PDF/->

[/160922%20Hazelwood%20Drive%20%2D%20Redacted%20Reg%2019%20Reps%20ISSUE%5F%20Angle%20Property%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/617161/PDF/-/160922%20Hazelwood%20Drive%20%2D%20Redacted%20Reg%2019%20Reps%20ISSUE%5F%20Angle%20Property%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Cameron Ashbrook (41994337)</b>
<b>Organisation:</b>

<b>Response ID: 1117348</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I am writing to support re-defining the small field at the back of Queens Walk to Local Green Space (LGS) I enjoy this green space. I look out of my window and can see many people in the community using this field throughout the day. I use this field myself on a regular basis, as it gives me a place to visit and walk. It is both very peaceful but also gives me an opportunity to meet my neighbours. I used the field to celebrate the Queen's Jubilee, where many families were able to get together for this event solely due to this space.
<b>Question 6:</b> You can upload any modifications below.
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Carol Ashbrook (41994305)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117347</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
I am writing to support re-defining the small field at the back of Queens Walk to Local Green Space (LGS) I live in a built up area and I very much enjoy seeing the green open space. It is an area I can look out of my window and see neighbours and residents walking their dogs and children playing. I use the field on a regular basis. The field has been an exceptional advantage to me and the community to bring us together and enjoy community events e.g. the Queen's Jubilee.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Lukas Ashbrook (41994273)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117346</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>I am writing to support re-defining the small field at the back of Queens Walk to Local Green Space (LGS)</p> <p>Living in a built up residential area can be detrimental to mental health. This is a green space for use by the local residents. It is an area that is peaceful but also allows a community spirit which is greatly valued.</p> <p>I used the field to celebrate the Queen's Jubilee and enjoyed getting together with my community for this event.</p> <p>The field is at the back of my house and I enjoy looking out and seeing the local community enjoying walking their dogs, meeting up and generally enjoying the space.</p> <p>I use the field on a regular basis and value it being there for the community.</p>	
<b>Question 6:</b> You can upload any modifications below.	

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Malcolm Ashbrook (41994241)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117344</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>I am writing to support re-defining the small field at the back of Queens Walk to Local Green Space (LGS)</p> <p>I have lived in Queens Walk for 36 years, and over this time I have used the field regularly. It is an area that I enjoy seeing at the back of my house. It provides the community with an area to walk dogs, and for children to play.</p> <p>I use the field on a regular basis, and I used it for the community party for the Queen's Jubilee.</p> <p>In addition, research has concluded that open spaces in residential and built up areas are good for mental wellbeing.</p>	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Cllr Maureen Attewell (19531713)</b>
<b>Organisation: Spelthorne BC Councillor</b>

<b>Response ID: 1117379</b>
<b>Policy / Evidence Base / Part of Plan: Policy E5: Open Space and Recreation</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Please find the attached detailed submissions for Local Green Space, the submission contains location map, photo, reason and contact details. This location is critical to be protected, and is highly valued by local residents. I would also like to take the opportunity to thank you for all your hard work on the local plan, this is appreciated by the residents of Spelthorne. Furthermore: All these sites are critical for the protection of Charlton Village and maintaining it as a Village.
<b>Question 6: You can upload any modifications below.</b>
LGS LSG Lincoln 2208c.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/585544/PDF/-/LGS%20LSG%20Lincoln%202208c%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/585544/PDF/-/LGS%20LSG%20Lincoln%202208c%2Epdf</a>

LGS LSG Rowlands 2208c.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/585545/PDF/-/LGS%20LSG%20Rowlands%202208c%2Epdf>

CV - Green Spaces - 20 Sept 22.docx

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/585546/DOCX/-/CV%20%2D%20Green%20Spaces%20%2D%2020%20Sept%2022%2Edocx>

LGS LSG Ashdene CI 2208c.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/585547/PDF/-/LGS%20LSG%20Ashdene%20CI%202208c%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Cameron Austin-Fell (42051521)</b>
<b>Organisation: Bewley Homes</b>

<b>Response ID: 1118438</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST1: Presumption in Favour of Sustainable Development</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
<p>Policy ST1: Presumption in Favour of Sustainable Development</p> <p>3.7 Here, beyond some locally specific information in the preamble and Reasoned Justification, Policy ST1 includes a recycle of text from the NPPF. Specifically, from Paragraphs 8, 11 and 12. Whilst factually correct, RPS would query the inclusion of this Policy, which is a repeat of the national position.</p> <p>3.8 In the interests of making the plan as streamlined as possible, it would be proposed that this policy is deleted, with remaining references to the NPPF retained.</p> <p>3.9 RPS notes that there are moves to amend national policy, which could be through a combination of changes to legislation (Levelling Up &amp; Regeneration Bill) and updates to national policy/guidance. Removing this policy would be further justified here, in order that it is not superseded in the event that these elements are significantly altered.</p>

Please attached document for further in-depth representation.

**Question 6:** You can upload any modifications below.

RPS obo Bewley Homes. Spelthorne Reg 19 Represnetations September 2022.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/587725/PDF/->

[/RPS%20obo%20Bewley%20Homes%2E%20Spelthorne%20Reg%2019%20Represnetations%20September%202022%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/587725/PDF/-/RPS%20obo%20Bewley%20Homes%2E%20Spelthorne%20Reg%2019%20Represnetations%20September%202022%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Cameron Austin-Fell (42051521)</b>
<b>Organisation: Bewley Homes</b>

<b>Response ID: 1118458</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Policy ST2: Planning for the Borough 3.10 This policy sets out the overarching strategy for growth, including the overall provision of land for housing, employment and Gypsy and Travellers. This policy has been expanded upon since the Preferred Options consultation, to include two additional clauses concerning density and Biodiversity Net Gain (“BNG”). As a broader observation, RPS considers that these clauses are perhaps not best placed here and should be moved to more appropriate sections of the plan – namely the housing and environment sections. As things stand, these matters appear to be shoehorned into this Policy. 3.11 Turning to the strategy itself, it is clear that this is an allocation led strategy, as opposed to one which is defined by a hierarchy of settlements. To this effect, the Council sets out its strategy for meeting its growth targets of 618dpa in the supporting table in the reasoned justification to the policy.

This table sets out how the Council's allocation 6,073 dwellings will, along with other sources, contribute towards the total expected growth of 9,439 units.

3.12 To understand this strategy, we have to turn to the published SA (May 2022), Chapter 3 of which sets out how the spatial options here have been defined. Table 7 from this chapter, identifies five options, which are summarised below:

1. Meeting all need on urban land, with no loss of Green Belt;
2. Amend Green Belt boundary significantly to meet housing/employment need;
3. Focus growth in Staines;
4. Increase densities and release some more weakly performing Green Belt sites; and
5. Kempton Park garden village for circa 3,000 dwellings.

3.13 These options were considered as part of the 2019 Preferred Options consultation, and presented an overall scoring as illustrated below. Please see attached document for in-depth representation and related tables and figures.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Cameron Austin-Fell (42051521)</b>
<b>Organisation: Bewley Homes</b>

<b>Response ID: 1118644</b>
<b>Policy / Evidence Base / Part of Plan: Policy PS1: Responding to the climate emergency</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Policy PS1: Responding to the Climate Emergency 9.2 This policy sets out a myriad of requirements on new development covering non-energy and energy-based development uses, and within residential development it includes requirements for replacements, conversions, and subdivisions. The policy sets out criteria covering residential development. 9.3 Indent 5 requires: "New homes should (RPS emphasis) achieve a 31% reduction on the Dwelling Emission Rate (DER) against the Target Emission Rate (TER) based on the 2013 Edition of the 2010 Building Regulations (Part L). A fabric first approach shall be prioritised, ensuring that at a minimum the thermal performance of the whole envelope exceeds that of the notional specification by 5%". Recognising the emphasis on 'should' achieve, the policy should be amended to recognise that not all proposals will be able to achieve these new standards without undermining their viability. On this basis, the wording should be adjusted to introduce a measure of flexibility in this regard.

9.4 As mentioned previously, given the Council's large allocation of housing is situated on brownfield sites it is likely a large number of sites will have viability issues, hindering the Council's strategy in meeting this target. The Council should therefore look to less constrained smaller greenfield sites that would be able to deliver this, however, given the monitoring indicators for the policy do not mention 'number of new dwellings complying with the new thermal performance targets', its questionable why the policy should remain if the Council is not going to monitor its progress towards its declared Climate Emergency.

Please see attached document for further in depth representation.

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Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Cameron Austin-Fell (42051521)</b>
<b>Organisation: Bewley Homes</b>

<b>Response ID: 1124629</b>
<b>Policy / Evidence Base / Part of Plan: Policy PS1: Responding to the climate emergency</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
SP4: Green Belt 5.1 The Council sets out its approach to the Green Belt in Policy SP4 of the SLP. This policy seeks to set out those Very Special Circumstances (“VSCs”) that would be considered in the context of a planning application, but it is also noted that evidence supporting the SLP has been submitted, to justify the release of some land from the Green Belt. The key evidence base informing this policy is contained in the Council’s Green Belt Assessment (“GBA”), prepared in three stages from 2018 through to 2022. The GBA comprises of a main report with assessments, detailing the parcels and broad areas, and a series of appendices for the site proformas.

5.2 RPS considers that there are methodological concerns with the assessment which render it flawed, and as a consequence, the Council has not approached its strategy for identifying the more weakly performing Green Belt parcels with robust evidence. By way of example. RPS considers the Green Belt evidence base in the context of Charlton Village, where my client has land interests.

5.3 The area of Green Belt around Charlton falls within 'Local Area 29' of the report(s). The extract from the SLP (Spatial portrait) below shows the full extent of the Green Belt, which covers a substantial area of the Borough – not simply on the built-up area but also within (light blue shading). For clarity, land in the control of Bewley Homes is highlighted with a 'star' on the maps below. (Please see attached document for further in depth rep)

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Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Cameron Austin-Fell (42051521)</b>
<b>Organisation: Bewley Homes</b>

<b>Response ID: 1118461</b>
<b>Policy / Evidence Base / Part of Plan: Policy H1: Homes for All</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
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No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Policy H1: Homes for All Housing Need 4.1 Policy ST2 [Planning for the Borough] of the SLP deals with the provision of land for housing to meet the requirement for new homes over the plan period (2022-2037). This is replicated as part of Policy H1, which RPS addresses here. The policy seeks to establish a new housing requirement to deliver a total of 9,270 additional homes over the period. This is a marginal increase from the figure of 9,045 identified within the 2019 Preferred Options plan. 4.2 Spelthorne sits within a housing market area (“HMA”) with Runnymede Borough Council. Spelthorne shares its strongest economic links with Runnymede, Elmbridge, and the London Boroughs of Hillingdon & Hounslow and together these authorities sit within a Heathrow focussed Functional

Economic Market Area (“FEMA”). Runnymede has recently had its Local Plan examined. The Runnymede Local Plan will make provision for a minimum of 7,480 net additional dwellings over their plan period. Spelthorne has the intention to allocate land to deliver 618 net additional homes per annum.

4.3 RPS notes that the total housing requirement of 9,270 dwellings comprises solely of the minimum local housing need figure and the Council have not contributed towards the unmet needs of the HMA. RPS wishes to raise a few points in relation to this approach.

4.4 Firstly, it is evident that the scale of affordable housing need identified in the Council’s SHMA update (2019) raises questions as to whether the SLP makes sufficient provision for housing, including affordable housing, as required by the NPPF. Current evidence of affordable housing need for the Borough as set out in the SHMA 2019 report suggests there is a need for 459 affordable homes in the Borough per annum over the plan period. This equates to 74% of the baseline in local housing need of 618 dwellings per annum. On this basis, the SHMA recommends that ‘the Council should seek as much affordable housing need as viably possible’. RPS therefore contends that greater measures should be taken in the SLP to address the scale of need that is recognised as being significant in Spelthorne in line with its own evidence. This could include setting the housing requirement in excess of the baseline need figure of 618 dwellings in order to make a meaningful attempt to address the affordable needs of households in Spelthorne.

4.5 In doing this, it is important to look at the past level of delivery which according to the Council’s own evidence within the SHMA (para. 4.33) the supply of affordable housing has averaged at 178 dwellings per annum. The data is again evident as part of the latest (2020/21) Annual Monitoring Report (“AMR”) published by the Council, which indicates that since 2009, the Council has delivered 3,576 dwellings (Table 10 refers), and only 604 net affordable dwellings (Table 11). This overall rate of 17% is demonstrably lower than the target of 40% set out in policy HOU3 of the existing Development Plan.

4.6 This past level of average delivery is incredibly low. Given the viability issues associated with many brownfield sites generally, of which Spelthorne has allocated a large amount, it is important to recognise the impact this has on the delivery of affordable housing. RPS therefore recommends the Council look at sites which are less constrained, more viable typologies to ensure this need can be met.

4.7 Consequently, the Council’s approach to addressing the affordable housing needs has not been fully explored, and as such, is unjustified and not soundly based.

Please see attached document for in depth representations.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Cameron Austin-Fell (42051521)</b>	
<b>Organisation:</b> Bewley Homes	
<b>Response ID:</b> 1118468	
<b>Policy / Evidence Base / Part of Plan:</b> Policy H2: Affordable Housing	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
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<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>Policy H2: Affordable Housing</p> <p>4.16 As indicated in the response to the spatial strategy, RPS has very strong concerns that the Council's approach to distributing growth will not deliver on the targeted provision for 30% of all development on brownfield sites and 50% on greenfield sites. For the reasons set out in response to the spatial strategy, there is a real risk that the affordable need identified by the Council will be severely undershot, as the Council has not included the right typology of housing land to meet this need. The solution here, as set out in response to ST2, would be to increase the supply of housing on less constrained sites, capable of higher affordable housing delivery. As acknowledged by the Council, those undeveloped sites would afford such capability. Please see attached document for in depth representations.</p>	
<b>Question 6:</b> You can upload any modifications below.	



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Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Cameron Austin-Fell (42051521)</b>
<b>Organisation: Bewley Homes</b>

<b>Response ID: 1118482</b>
<b>Policy / Evidence Base / Part of Plan: Policy E2: Biodiversity</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
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<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Policy E2: Biodiversity 6.1 The Council sets out its approach to designated sites of conservation, biodiversity net gain and waterbodies in the Borough in Policy E2 of the SLP. Policy E2 sets a requirement for proposals to contribute to biodiversity through clearly demonstrating improvements as part of securing biodiversity net gain, to be delivered in a preferred hierarchy. 6.2 RPS notes that the Council has published some evidence in support of its approach, including specific surveys for Sites of Nature Conservation Interest ("SCNI"). Here, RPS observes the Council has published a review of the Ashford Plant SCNI, which RPS wishes to comment on, in the technical note provided at Appendix 1 to these submissions.

6.3 As part of this review, RPS notes that the survey data underpinning the assessment of the SNCI is now somewhat dated, but also only partially complete. The Ashford Plant SCNI forms part of a number of waterbodies in this area, sitting close to the much larger Queen Mary's Reservoir, and the sites have been identified for their potential contribution to supporting wintering waterfowl. However, as identified in the Technical Ecology Note (Appendix 1), the assessment has not been supported by a survey specific to wintering/breeding birds, to support the assertions that the site does qualify as a SNCI. RPS further notes that only a partial assessment of the site has been undertaken.

6.4 Until such an assessment can be undertaken, RPS remains of the view that the evidence base supporting the inclusion of the Ashford Plant SNCI remains partial and incomplete. As such, the policy is not currently evidence-led and soundly based.  
Please see attached documents.

**Question 6:** You can upload any modifications below.

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Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Cameron Austin-Fell (42051521)</b>
<b>Organisation: Bewley Homes</b>

<b>Response ID: 1118487</b>
<b>Policy / Evidence Base / Part of Plan: Policy EC3: Local Centres, Shopping Parades and Isolated Retail Units</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
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No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
EC3: Local Centres, Shopping Parades & Isolated Retail Units 7.1 Policy EC3 sets out the Councils approach to protecting the role that Local Centres (including Charlton) play in providing for local shopping and service needs of the community. Whilst it is noted there are opportunities listed to work towards continuing improvement of these centres, focussed around leisure – an approach we generally support of directing development and focus for regeneration and investment. It is considered appropriate that new development should be directed to where it is most needed but also where it is best able to accommodate it in terms of accessibility and existence of facilities and services to serve new development. 7.2 RPS notes that Charlton Village has been included within this list of Local Centres, part of a cache of locations identified for their ability to meet some of the local day to day needs, in less connected locations.

7.3 Here, RPS notes that the Council offers protection to such centres as part of emerging Policy EC3, however fundamentally, no consideration appears to be given to what growth will be directed to areas such as Charlton Village to ensure that the locations can actually continue to offer a viable service to the local area. These areas need an influx of growth to be able to continue to thrive and grow and there needs to be a synergy here between emerging policy EC3, and the overall housing and employment growth strategy proposed by the Council. In relation to Charlton Village, RPS does not consider that there is sufficient

provision of new housing that can grow the native population in a way that will ensure the vitality and growth of existing services.

7.4 As things currently stand, the policy offers a measure of protection against conversion to different uses, but does not actively promote a pattern of growth that would enable the continued support of those services. Whilst the Council recognises that such areas are important, RPS considers that the policy is currently not soundly based, and should be considered in the context of the relationship to the spatial strategy.

Please see attached document for further in depth reps,

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Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Geoffrey Bailey (27304225)</b>
<b>Organisation:</b>

<b>Response ID: 1124252</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
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No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I'm against any further loss of green belt land through property development. Staines has become a dormitory town with already far too much property development. The town's infrastructure is already overstretched. Not the place I once enjoyed living in having been brought up in Ashford.
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Chloe Barlow (40359617)</b>
<b>Organisation:</b>

<b>Response ID: 1124076</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Green belt: Sunbury common: Groveley road As a resident of Groveley road I am extremely concerned to hear that the small area of Green Belt that exits here could be used for developments. Green belt seems to be fast vanishing and being replaced by developments, equalling more pollution, poor air quality. This is an area that is struggling to cope with the busy traffic here as the huge BP complex has been built at the other side of the road, the busy A316 the other side of the green belt and the parade of shops and pub also on Groveley road next to the Green belt which causes much disruption and heavy traffic. To build further developments here would be devastating to the area, the wildlife and seriously impact the everyday life's of residents here.



I feel it would force my family to leave the area as I already have huge concerns on the amount of traffic travelling through the road and being the only area around the BP complex that has no speed bumps I fear for my children's safety!  
To take away this small piece of Green belt sandwiched inbetween a huge BP complex, parade of shops, pub, A316 and some large housing estates would be totally devastating.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Cllr Colin Barnard (42100961)</b>	
<b>Organisation:</b>	
<b>Response ID: 1119444</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
For consideration for inclusion as Local Green Space Junction of Shepperton High St and Cliveden Place A small area in the built-up High Street in Shepperton offering a much-appreciated green space. Local community volunteers already look after the provision of flowers in various beds down the High St and this green area offers a tree-planting opportunity to support the community's existing efforts to encourage bio-diversity and wildlife here.	
<b>Question 6:</b> You can upload any modifications below.	
For consideration for inclusion as Local Green Space - Shepperton cllrs_Redacted.docx	

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618972/DOCX/-/For%20consideration%20for%20inclusion%20as%20Local%20Green%20Space%20%2D%20Shepperton%20cllrs%5FRedacted%2Edocx>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr David Barnard (41983201)</b>	
<b>Organisation:</b>	
<b>Response ID: 1124254</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>I am writing to express my strong objections to plans to release Green Belt land for building land in the draft Local Plan. I feel that it is of paramount importance to respect Green Belt boundaries in order to check the unrestricted sprawl of urban encroachment and to protect countryside and green spaces. It is disappointing that the Council has refused to designate Green Belt areas as Local Green spaces especially at a time when we are aware of the importance of such spaces for local people's physical and mental well-being. Generally I feel that in a time of Climate change it is more important than ever to preserve our green spaces, and so I urge the Council to reject these proposals.</p>	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Michelle Barnett (41983105)</b>	
<b>Organisation:</b>	
<b>Response ID: 1124253</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
I write to you today to ask for you not to reduce the green belt. I stress the importance not to amend existing Green Belt boundaries but respect them for now and future generations. I call on you to not make a pro-active case for Green Belt release in the draft Local Plan. I also ask you not to declare that there are 'exceptional circumstances' to justify Green Belt release. I feel it's important to express my disappointment that you have refused to Express your disappointment that the Council has also refused to designate 19 Green Belt areas (that were proposed by residents) as Local Green spaces and I you to reverse this refusal.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Clare Barratt (42350817)</b>	
<b>Organisation:</b>	
<b>Response ID: 1121625</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Please find the attached 11 detailed submissions as Local Green Space, each submission contains location map, photo, reason and contact details. These locations are critical to be protected, they are valued by local residents. I would also like to take the opportunity to thank you for all your hard work on the local plan, this is appreciated by the residents of Spelthorne.	
<b>Question 6:</b> You can upload any modifications below.	
Barratt - LDF Lynegrove Avenue AshC 2209p_Redacted.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619504/PDF/-/Barratt%20%2D%20LDF%20Lynegrove%20Avenue%20AshC%202209p%5FRedacted%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619504/PDF/-/Barratt%20%2D%20LDF%20Lynegrove%20Avenue%20AshC%202209p%5FRedacted%2Epdf</a>	



Barratt - LDF Tudor AshC 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619505/PDF/-/Barratt%20%2D%20LDF%20Tudor%20AshC%202209p%5FRedacted%2Epdf>

Barratt - LDF Chessholme Road AshC 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619506/PDF/-/Barratt%20%2D%20LDF%20Chessholme%20Road%20AshC%202209p%5FRedacted%2Epdf>

Barratt - LDF Elgin AshC 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619507/PDF/-/Barratt%20%2D%20LDF%20Elgin%20AshC%202209p%5FRedacted%2Epdf>

Barratt - LDF Stroud Way AshC 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619508/PDF/-/Barratt%20%2D%20LDF%20Stroud%20Way%20AshC%202209p%5FRedacted%2Epdf>

Barratt - LDF Metcalf Road AshC 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619509/PDF/-/Barratt%20%2D%20LDF%20Metcalf%20Road%20AshC%202209p%5FRedacted%2Epdf>

Barratt\_Clare - combined\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619510/PDF/-/Barratt%5F%20Clare%20%2D%20combined%5FRedacted%2Epdf>

Barratt - LDF Norman AshC 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619511/PDF/-/Barratt%20%2D%20LDF%20Norman%20AshC%202209p%5FRedacted%2Epdf>

Barratt - LDF Dane Road AshC2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619512/PDF/-/Barratt%20%2D%20LDF%20Dane%20Road%20AshC2209p%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Wendy Barrett (41983233)</b>	
<b>Organisation:</b>	
<b>Response ID: 1124255</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
In the proposed planning on green belt land in Spelthorne, will there be extra school places or enlarged health services facilities to accommodate all the new residents ? It seems there are no such arrangements I write to record my strong objections to this loss of green belt land. Covid restrictions proved how essential outdoor spaces are for our health, and especially that of children.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Susan Barter (33552225)</b>
<b>Organisation:</b>

<b>Response ID: 1125951</b>	
<b>Policy / Evidence Base / Part of Plan: Policy SP1: Staines-upon-Thames</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: Big idea six: the town centre has been identified by the local plan as having potential to accommodate thousands of new homes!!!! That means thousands of additional residents and no mention anywhere about infrastructure for these people; schools, doctors,
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
How can you justify comment in idea 6: Town centre has been identified ...as having the potential to accommodate thousands of new homes. You are trying to shoehorn as many people into this area without thought for the current residents or the infrastructure needed for thousands of additional residents. Do any of you who are voting this in actually live in Staines, or are you happy to ruin Staines so that the area where you live remains urban & uncrowded??!!	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
You are trying to ruin this area by making it an overspill from London which will bring a great many issues including the need for extra policing, as well as seeming to have not thought out the required infrastructure for all these additional people. You are making this area another urban jungle, you should be ashamed of yourselves	

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Collette Batchelor (41994369)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117349</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>I am writing in relation to a 'Local Green Space' opposite our home on Chessholme Road.</p> <p>It is extremely concerning that this space could be acquired and built on, we use the green daily to exercise our two dogs. The children in the street also use the green on a daily basis for playing and socialising.</p> <p>The neighbours all use this a focal meeting point and it is an extremely welcoming space for all. The space offers a beautiful greenery for living species.</p> <p>Please do keep me informed on any changes to the land ownership</p>	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Ian Beardsmore (41415905)</b>	
<b>Organisation:</b>	
<b>Response ID: 1124262</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Green Belt: Sunbury Common: Land at Groveley Road I am writing to strongly support Spelthorne's position that this land in its entirety should remain Green Belt and that no development whatsoever should be allowed on it. REASONS Simply it fulfills all the five purposes of the Green Belt (a-e) as set out in the NPPF (2021) p138 a & b) The settlements of Sunbury and Feltham both appear in the Domesday book as being in the hundred of Spelthorne.....Fast forward to the present day they are remarkably similar in their urban geographies. A core of settlement that has had its density increase massively in the last thirty or so years	

(Sunbury Cross/Feltham High Street). Fanning out from which is dense urban settlement, that has also intensified in recent decades. Were it not for Green Belt like that at Groveley Road the two would certainly have merged long ago.

c) Until quite recently this land was cropped, since then it has supplied a display of wildflowers that certainly brightens things up in summer. Any development would of course compromise this

d) Both towns are 'historic' even if neither of them are on the front pages of history books. Sunbury is a Saxon foundation (Charter c970AD) on an earlier bronze age site. Feltham similarly has a Saxon charter. Both have made their own small contributions to history over the last thousand years or so.

e) As has already been noted both settlements are making much more intensive use of their brownfield sites in order to defend against encroachment of the Green Belt.

Also I completely oppose the proposed extension of the built up area at the western end of the site, it is nit safe in policy terms. It is crucial to understand that the proposed site is part of a single contiguous area of substantial Green Belt which fulfills all the Green Belt requirements. The site was used for gravel extraction in the late 30's I have researched maps back before then, and there is not a single instance of north South Boundary (either natural or man made) such as that proposal seeks to create.

I do not accept that the division between C2 and C3 housing is relevant in this case. Sunbury already has specialist housing for older residents, with more likely under the plan. Further unlike many other authorities we have worked very hard to meet our housing need.

In addition a few hundred yards from this site along the other arm of Groveley Road is a 'King Georges Field' (itself the subject of a proposal for inclusion as LGS) About 20% of these schemes were accepted. They were set up in the memory of George V driven by a growing fear of 'urban sprawl' in the later 30's. So recognition of the threat of urban encroachment in this part of Sunbury is an 80yr history. (The field is now part of 'Fields in Trust')

Green Belt: Sunbury East: Land at Kempton Park

I am writing to support Spelthorne's position that none of this land should be removed from the Green Belt.

REASONS:

The land fulfils many of the purposes of Green Belt seperating the settlements of Sunbury and Hampton. Both are historic Domesday settlements, except Kempton (Kenyngton or Chennestone) was then seperate from Sunbury. Due west of the site, settlement is heavily urbanised culminating in the high densities of Sunbury Cross. Hampton lacks the same urban heart, but is otherwise very heavily urbanised. They are distinctly seperate settlements with the border between them originally being part of the border between the two 'Hundreds' Hampton being in the (then) Hundred of Hounslow rather than in Spelthorne. In modern times the border between the two is the border between London and Surrey, a very major boundary. So Kempton Park Green Belt seperates not just two communities but two regions.

On the Northern Boundary is a heronry that is part of the 'South West London Water Bodies' Ramsar site. As such it has world recognition for its contribution to waterfowl preservation. Even if this part of the site was not built on, any urban intensification in the area can only be very harmful.

As part of its proposal to meet housing need Spelthorne is proposing the release of a few smaller Green Belt sites for housing. A third of all those sites are in Sunbury, add to that the further proposed intensification of development areound Sunbury Cross and the area is already making a significant

contribution to meet housing need. But those proposals mean we do not have to even contemplate releasing such insignificant sites as this either in whole or in part.

**Question 6:** You can upload any modifications below.

GB - SunCommon - Groveley Road IB-4\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618827/PDF/-/GB%20%2D%20SunCommon%20%2D%20Groveley%20Road%20IB%2D4%5FRedacted%2Epdf>

GB - SunEast - Kempton Park IB-5\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618828/PDF/-/GB%20%2D%20SunEast%20%2D%20Kempton%20Park%20IB%2D5%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Ian Beardsmore (41415905)</b>
<b>Organisation:</b>

<b>Response ID: 1112964</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
It may seem paradoxical to submit an over arching case to what is by definition 'Local'. Let me be clear I have seen quite a few proposals for new Local Green Space to be incorporated into the emerging plan. They all come with their own specific reasons allowing them to each stand alone. Which is at it should be. That does not stop their being additional over arching reasons for them collectively. I believe there is. Spelthorne's dilemma is documented elsewhere, 35% of the Borough is Brownfield, 25% is water and another 5% or more is under long term brownfield use as part of the Water/Waste/Mineral extraction industries. Leaving just 35% green land for everything else. This makes such land disproportionately more valuable. It maybe goes some way to explain the fierce and often ugly conflicts about proposing any of our Green Belt land for development.

This is well documented, but another by-product from this is not. Spelthorne has come under attack for having some of the very worst tree cover in the country. We are right down at the bottom of the league for trees and plenty of voices readily scream at us to improve this. Where do we plant them? Especially if major landowners are hostile because they harbour long term hopes of turning their land holding into housing one day. It is galling that while we are so easily marked down because of our lack of trees, the converse is not true. We get no credit for the fact that almost 10% of the Borough is a world recognised RAMSAR site, and that we are also home to the Swan Sanctuary which has a national reputation for conservation. Of course both of these rely overwhelmingly on our water. Water and trees are incompatible land uses. The same site cannot be used for both. Many of the LGS suggestions come down to the presence of trees on the site. Maybe not a lot but in Spelthorne for the reasons outlined above trees are disproportionately valuable. While precise reasons for LGS are not specified, recreation, wildlife, history and tranquility are mentioned. I would argue that in Spelthorne Trees are just as important as any of these. There is a strong case to say they are covered by 'wildlife' criteria since trees extend the range of wildlife habitat provided, over that of just a piece of grass. Nevertheless I feel strongly that in Spelthorne Trees should be recognised as significant reason for LGS in their own right. One thing this process has done is throw up several sites where further tree planting could take place and I am sure there will be a real appetite for this going forward. Indeed the whole process of identifying potential LGS sites threw up many sites that were no more highway verges featuring the odd tree which could not be justified as LGS, probably a third of all proposals were rejected because of this. There is, I feel a second overarching reason to take a positive view about new LGS. Overwhelmingly the local Plan is perceived as a land grab by developers which councils do nothing to stop. That this is a gross distortion of the truth, does not alter the perception. By finding new LGS which meet the criteria, it can be seen as taking positive steps to mitigate the loss of Green Belt. The scale will be totally different, but besides the obvious environmental benefits to the Borough, it will enable a more positive picture of planning process to be presented. In addition given the distribution of the proposed sites across the borough, the benefits are far more widely distributed. Spelthorne could do with some good positive outcome like this.

**Question 6:** You can upload any modifications below.

LGS - Sun C - Keyword Dr TW16 IB-2.pdf

[https://spelthorne.inconsult.uk/gf2.ti/af/1409506/619795/PDF/-/LGS%20-%20Sun%20C%20-%20Keyword%20Dr%20TW16%20IB-2\\_Redacted.pdf](https://spelthorne.inconsult.uk/gf2.ti/af/1409506/619795/PDF/-/LGS%20-%20Sun%20C%20-%20Keyword%20Dr%20TW16%20IB-2_Redacted.pdf)

LGS - SunE - Staines Rd East TW16 5AY IB-3.pdf

[https://spelthorne.inconsult.uk/gf2.ti/af/1409506/619789/PDF/-/LGS%20-%20SunE%20-%20Staines%20Rd%20East%20TW16%205AY%20IB-3\\_Redacted.pdf](https://spelthorne.inconsult.uk/gf2.ti/af/1409506/619789/PDF/-/LGS%20-%20SunE%20-%20Staines%20Rd%20East%20TW16%205AY%20IB-3_Redacted.pdf)

LGS - SunC - Heath Grove TW16 7TS IB-1A.pdf

[https://spelthorne.inconsult.uk/gf2.ti/af/1409506/619794/PDF/-/LGS%20-%20SunC%20-%20Heath%20Grove%20TW16%207TS%20IB-1A\\_Redacted.pdf](https://spelthorne.inconsult.uk/gf2.ti/af/1409506/619794/PDF/-/LGS%20-%20SunC%20-%20Heath%20Grove%20TW16%207TS%20IB-1A_Redacted.pdf)

LGS - SunC- Shears Court TW16 IB-07.pdf

[https://spelthorne.inconsult.uk/gf2.ti/af/1409506/619793/PDF/-/LGS%20-%20SunC-%20Shears%20Court%20TW16%20IB-07\\_Redacted.pdf](https://spelthorne.inconsult.uk/gf2.ti/af/1409506/619793/PDF/-/LGS%20-%20SunC-%20Shears%20Court%20TW16%20IB-07_Redacted.pdf)

LGS - SunC - Skate Park TW16 IB-08.pdf

[https://spelthorne.inconsult.uk/gf2.ti/af/1409506/619792/PDF/-/LGS%20-%20SunC%20-%20Skate%20Park%20TW16%20IB-08\\_Redacted.pdf](https://spelthorne.inconsult.uk/gf2.ti/af/1409506/619792/PDF/-/LGS%20-%20SunC%20-%20Skate%20Park%20TW16%20IB-08_Redacted.pdf)

LDF LGS general IB-06A.pdf

[https://spelthorne.inconsult.uk/gf2.ti/af/1409506/619791/PDF/-/LDF%20LGS%20general%20IB-06A\\_Redacted.pdf](https://spelthorne.inconsult.uk/gf2.ti/af/1409506/619791/PDF/-/LDF%20LGS%20general%20IB-06A_Redacted.pdf)

LGS - Staines - Priory Green 2209p.pdf

[https://spelthorne.inconsult.uk/gf2.ti/af/1409506/619790/PDF/-/LGS%20-%20Staines%20-%20Priory%20Green%202209p%20IB\\_Redacted.pdf](https://spelthorne.inconsult.uk/gf2.ti/af/1409506/619790/PDF/-/LGS%20-%20Staines%20-%20Priory%20Green%202209p%20IB_Redacted.pdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: sam beaton (41153217)</b>
<b>Organisation:</b>

<b>Response ID: 1110057</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No. Too many new flats. Not enough infrastructure to support the new residents. The roads in the town center are already busy- this will clog them up further.	Additional Comments: No. Too many new flats. Not enough infrastructure to support the new residents. The roads in the town center are already busy- this will clog them up further.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No Response	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Malcolm Beecher (23601825)</b>
<b>Organisation:</b>

<b>Response ID: 1121137</b>
<b>Policy / Evidence Base / Part of Plan:</b> Evidence base - IDP
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Education The Infrastructure Delivery Plan assessment of education provision does not paint a sound picture. Spelthorne is reliant upon Surrey County Council to supply school places. Primary school places may appear evenly spread across the borough but there is little or no provision in Staines, where the bulk of development growth is planned. This means that Staines residents will have to travel out of town to find primary school places increasing the transport demand and pollution across the borough. And where developers are permitted to reduce parking provision, parents will require transport to get their children to school. Admittedly, the lack of primary school provision is not highlighted in developers' advertisements for 2- and 3-bedroom flats. High-rise development ploughs on with over 1,000 approved flats, which could potentially house 300 – 500 additional school children.

Moreover, development of secondary school places is planned for Sunbury across to the east of the borough to where there is limited public transport. This throws out of the question any compliance with “Twenty Minute Neighbourhood” provisions. Secondary school provision in Sunbury is also taken up by pupils from outside the borough, coming in from Richmond and Hounslow. Similarly, secondary school pupils from Staines need to travel out of the borough to find places. The Matthew Arnold School is the only provision of secondary education in Staines, but also takes pupils from Ashford. An opportunity to incorporate a secondary school or even a sixth-form college was lost with the current proposals to develop flats alongside the NHS clinic on the Kingston Road Car Park site in Staines.

It is proposed to release a parcel of Green Belt, some 2.34 hectares, to build a ‘private’ sixthform college. This parcel’s importance as Green Belt was progressively down-graded once the proposal for a sixth-form college had been made. Included in that proposal was several houses. This was seen by councillors as a deliberate attempt to release vital Green Belt for housing on the back of the college application. This will add to the concentration of sixthform places in the east of the borough. The former ‘Debenhams’ building in the centre of Staines could be repurposed as a sixth-form college close to the principal railway station in the borough. However, a predatory developer is still trying to develop the site in Staines town centre without compromising the locally listed building and the Staines Conservation Area.

There is little local provision for education and what there is is a mess. There is an apparent expectation that parents will continue to chauffeur their children to school across the borough and beyond with little or no regard towards air quality, safety, and traffic congestion.

See attached document for full response.

**Question 6:** You can upload any modifications below.

Pre-Submission Spelthorne Local Plan - Review MB.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/595900/PDF/-/Pre%2DSubmission%20Spelthorne%20Local%20Plan%20%2D%20Review%20MB%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Malcolm Beecher (23601825)</b>	
<b>Organisation:</b>	
<b>Response ID: 1121141</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Evidence base - IDP	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>Healthcare</p> <p>According to Practice Index, a General Practitioner should have around 1,600 patients on their list. With a current population of roughly 100,000, Spelthorne's health centres and surgeries should be staffed with at least 63 qualified doctors. (see attached document for relevant table, page 7). that on average there are currently just about enough doctors. At a ratio of 1:1,558 there is just about sufficient general practitioners to meet current local needs boroughwide. The planned influx of new residents over the next 15 years will require the recruitment of a further 13 doctors as well as the retention and replacement of the existing 69 (some of whom are still in training). But this is not mentioned as part of the healthcare provision identified in the Infrastructure Delivery Plan. Indeed, healthcare delivery to support the Local Plan has only been allocated £21.6 million. What this funding does not identify is from where the NHS will acquire 13 fully trained general practitioners, the nursing and administration staff to support</p>	

them and, of course, the pharmacists to meet the dispensing needs of the extra patients.

However, before we even get there, the critical shortage of doctors in Staines (3) and Stanwell (2) needs to be addressed. Moreover, even with a low conservative estimate of the population growth in Staines, the town will need an additional 7 new doctors with support staff and facilities. From where are these new doctors to come? It takes 10 years from entering university, if the student successfully gets one of only 7,500 places in England to study medicine, to qualify as a general practitioner. Is this on Surrey Heartlands timetable? And with the Local Plan effectively front-end loaded, these doctors need to be in post earlier than 2033.

The much-heralded NHS Cavell Centre in Staines is not going to address the shortage of GPs. This centre only pulls together patient services from across the borough and upgrades the current GP facilities within Staines.

It does not appear a fair or sound strategy to plan to build the most housing and attract the largest number of new residents in the part of the borough which currently has the least healthcare provision available. But it is consistent with the other failings of the Local Plan. The demand for new housing comes from the central government's desire to build 300,000 new homes each year for the next five years, but at the same time when there is a critical shortage of doctors, who are essential to the development of a community, the government sets a cap of 7,500 new medical students for 2022.

See attached document for full response.

**Question 6:** You can upload any modifications below.

Pre-Submission Spelthorne Local Plan - Review MB.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/595941/PDF/-/Pre%2DSubmission%20Spelthorne%20Local%20Plan%20%2D%20Review%20MB%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Malcolm Beecher (23601825)</b>
<b>Organisation:</b>

<b>Response ID: 1121142</b>
<b>Policy / Evidence Base / Part of Plan:</b> Evidence base - IDP
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Emergency Services With a population expected to increase to well over 120,000 residents before 2037, Spelthorne is served by only 1 fire station, which only has 1 front line appliance (a crew of 4 firefighters) overnight. Most domestic fires, with the threat to life, occur between 6pm and 8pm, at the same time as Spelthorne's fire cover is reduced from two appliances to the single night-time appliance. It is domestic fires that are the greater threat to life than commercial fires, which may have a greater financial loss. Is Fordbridge fire station adequately equipped to fight a fire in a high-rise block in Staines? Are regular evacuation drills proposed or are residents expected to stay in a burning building like Grenfell Tower? Surrey Fire & Rescue Service management and Surrey County Council are content with the provision of fire cover in Spelthorne, but we are the ones who live here. Unfortunately, there is no independent verification as to whether their contentment is justified. At night, when most people are at home, there

are just 4 firefighters with one appliance looking after over 120,000 people, the roads including two motorways, Staines Moor and Shortwood Common, and the River Thames. I only sleep well because I dare not think about it. Moreover, as we have seen this summer, there is an increasing threat of wildfires across grass and moorland. The land around Staines, Staines Moor and Shortwood Common, form a significant threat of such fires breaking out. See attached document for full response.

**Question 6:** You can upload any modifications below.

Pre-Submission Spelthorne Local Plan - Review MB.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/595947/PDF/-/Pre%2DSubmission%20Spelthorne%20Local%20Plan%20%2D%20Review%20MB%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Malcolm Beecher (23601825)</b>
<b>Organisation:</b>

<b>Response ID: 1121152</b>
<b>Policy / Evidence Base / Part of Plan:</b> Evidence base - IDP
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
<p>Transport</p> <p>Spelthorne Borough Council is not the transport authority for the borough and has little or no control over future transport provision. Surrey County Council is the local transport authority, but Spelthorne also receives buses from Transport for London (TfL) and rail services from South West Railways. Surrey County Council has set out its own ambitious aspirations to reduce carbon emissions, 46% of which across the county come from road traffic.<sup>10</sup> Statistics for car ownership across the county show that Surrey households have access to 687,000 cars, some 46% of households own two or more cars, and only 13% of households have no access to a car. Car ownership in Spelthorne averages at around 1.5 cars per household. With those statistics it seems ridiculous that Spelthorne council promotes developments that fail to supply sufficient parking space for even one vehicle, car or van, per household. If households across Spelthorne have 1.5 cars each, it is because experience has shown families that they need</p>

mote than one car on average.

With over 70% of commuting in Spelthorne by car or van. Spelthorne has the second largest use of road vehicles to get to work of all Surrey's boroughs and districts. Much of that demand is to get to work in and around Heathrow. Just not making sufficient allowance for parking provision is not going to persuade residents to give up vehicle ownership. How else can they get to work? But it will lead to even greater parking congestion in narrow local streets, not a worry for developers.

The dependence upon cars and vans for commuting in Spelthorne is no surprise. The proximity of Heathrow Airport and all the ancillary services around the southern perimeter require a lot of workers from Spelthorne. Many are shift workers who cannot rely upon public transport because of early starts and late finishes. (See attached document for relevant table, page 9).

The above figures for rail passenger usage at the four stations in Spelthorne are totals for the year 1 April through to 31 March. The count is by entry and exit through the ticket barriers.

We can assume that the vast majority of these trips are commutes, there will be exceptions for day trips into London and other visitor attractions, Thorpe Park and Windsor, and trips to sporting venues. We could divide the total recorded passengers by 520 (for simplicity, that is two commutes on the average number of working days, with no allowance for holidays). It is a rough estimate, but pre-Covid total passenger numbers across Spelthorne were around 9,000. These will include a good number of school students as well as adult workers. Rail services across Spelthorne are generally restricted to into and out of London Waterloo. Going the other way can take the traveller from Staines, the busiest station, to Windsor, Reading and, for the adventurous, even as far as Portsmouth. If you want to go anywhere else, north or south, you need a car.

Moreover, increasing ticket prices above the rate of inflation discourages rail use except for essential commuting. The impact of working from home and the change in working practices away from daily commuting has yet to be fully understood since the Covid pandemic. Rail companies have responded by introducing more flexible ticketing. But it seems unlikely that passenger numbers will recover to pre-pandemic rates. We have already seen a reduction in services to London by South West Railways. The housing need for London commuters would appear to be in decline.

Surrey County Council as the Local Transport Authority only has plans to contribute £1m over the foreseeable future to the development of bus infrastructure in North-West Surrey (Spelthorne) and that development is associated with improved connectivity with Heathrow. Additional funding is expected to come from central government, which would appear unlikely in the near to mid future. Any works will involve junction improvements, bus lanes, and bus-priority traffic signals, not services and routes. These improvements will not get more people onto buses while ticket prices are too high, and routes and timetables do not meet customer needs. Moreover, there is the ongoing threat of withdrawal of some unprofitable services.

If we are to encourage people to step away from private vehicle ownership, we need to improve bus services and make them affordable. This is unlikely to happen when the bus services are required to make a profit for the service providers. It will certainly not happen if the planned reduction in car ownership is simply encouraged by the lack of available parking provision. More buses will find their routes blocked or congested with parked cars.

Utilities



The Infrastructure Delivery Plan is more aspirational than a plan to deliver. There are no details as to how utility suppliers will meet Spelthorne Borough Council's increasing demand for electricity and water. There is barely any recognition of the size of the problem. And as we move away from fossil fuels there ought not to be any significant increase in gas demand, if any. Moreover, utility demand is assumed in isolation from what may be going on in neighbouring boroughs.

#### Electricity

We are already seeing the effects of the lack of investment in the electricity infrastructure by the privatised power supply companies. The Greater London Authority (GLA) has advised developers in the London Boroughs of Hillingdon, Ealing, and Hounslow, two of which border with Spelthorne, that there may not be sufficient capacity for new connections until 2035.

Why should the grid capacity be any better just across the border in Spelthorne? This question is not addressed in the Infrastructure Delivery Plan. Indeed, a restriction of supply could push housing and technology business development, which caused the problem in London, into Spelthorne. It should be noted that of the three Grid Supply Points identified in the Infrastructure Delivery Plan supply the whole of Surrey, but only Laleham is in Spelthorne borough, neighbouring boroughs will have their own increasing demands from their Local Plans. We must not assume that there will be any spare capacity from other Grid Supply Points. Moreover, when the enlarged Shepperton Studios comes on-stream, with double the capacity, it is likely to become a major consumer of power in the future. It should be anticipated that Shepperton Studios will also bring ancillary businesses and support services into the borough.

We must also assume that the 9,270 new build properties in the Local Plan will not consume any additional fossil fuels and will only use electricity. Depending upon the size and energy efficiency of each property they would be expected to consume between 11,000 kWh and 18,000 kWh annually. By 2037, when the 9,270 new electric only properties have been built, the increased demand on local power consumption will be roughly 370 MWh daily. That is over and above the present demand and does not include any additional business development and Shepperton Studios.

Moreover, this does not account for electric vehicle (EV) usage which will only increase. As we wean ourselves off fossil fuels, there will be a serious uptake in EVs. The proposed expansion by TfL of the Ultra-Low Emission Zone (ULEZ) across the Greater London Authority (GLA) by the end of August 2023 will encourage more people to buy an EV. Not to mention a desire to avoid rising petrol prices.

If in 2019, Spelthorne had an adult population of around 71,000 (based on registered electors) and each new property brings in 2 adults, on average, then by 2037 the adult population of Spelthorne will be closing on 90,000. If, say, only half the population owns or uses a private electric vehicle there could well be some 45,000 EVs needing power. Of course, there will be some fossil fuel guzzling vehicles but let us assume that Spelthorne has gone Green. EVs will not be charged daily, but we can average the demand daily because not everyone will charge their EV at the same time. According to the RAC Foundation, a new car averages 28 miles (45 kilometres) per day.<sup>15</sup> For an average EV that is equivalent to 9 kWh of electricity. With 45,000 EVs in Spelthorne by 2037 this creates a power demand of 405 MWh. There appear to be no plans to deliver that demand through any network of charging points. A recent planning application to set up an EV charging station in Spelthorne was rejected by the Local Planning Authority.

By 2037, there will be an increased demand for electricity of over 775 MWh daily. We can only assume that neighbouring boroughs will have similar demands. The aggregate demand across the three Grid Supply Points is 759.9 MW in the winter, which is predicted to rise to 878.2 MW. Of which a third will pass through the Laleham GSP, some 253.3 MW. If we assume that the 253.3 MW is the current demand for Spelthorne. Therefore, by 2037 the demand will exceed 1,028 MW. The existing capacity across all three GSPs is 1,797 MW, but only a third, or 599 MW, can safely be attributed to the Laleham GSP. By 2037, Spelthorne will demand more than the grid can deliver, without significant development. Spelthorne will find itself then in a similar condition to that of Hillingdon, Hounslow, and Ealing now.

Furthermore, as the impact of climate change develops, and our summers get longer and hotter there will be an increasing demand on power from existing properties and some 'new' developments for domestic air-conditioning units. This has not been factored into future demand. However, on a small bright side some of this additional power demand will be met locally through PV cells and enterprising domestic wind turbines. But nowhere near the capacity that future developments will need.

There are no guarantees that there will be sufficient power available to implement Spelthorne's Local Plan. So, it would seem that as far as future electricity demand goes, the Local Plan is not sustainable, or sound.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Malcolm Beecher (23601825)</b>
<b>Organisation:</b>

<b>Response ID: 1121155</b>
<b>Policy / Evidence Base / Part of Plan:</b> Evidence base - IDP
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Water & Sewerage Sewerage Thames Water is responsible for sewerage and drains. There has been little or no investment in the infrastructure for Spelthorne’s sewerage and drains. Although, Thames Water has stated an investment of £31 million to up-grade its Mogden Sewerage Treatment Works, there has been no investment in the drains and sewerage pipelines that feed the plant. All the investment is within the plant boundaries. It is generally assumed that if one connects into the existing drainage network it will cope. There is no proof that it can or will cope. In 2013, Thames Water was fined some £41,000 for illegally discharging and polluting the River Ash. More recently, this July, Thames Water has again discharged into the River Ash causing flooding of local properties. There has been a history of Thames Water discharging into both the River Thames and

the River Ash, in 2015, 2017, and 2020. We can add 2022, even if Thames Water refuses to answer the phone calls from the Environment Agency. If this is the situation with the existing population of 99,873, how are we to expect Thames Water to cope with the effluent of an extra 27,810 people? Moreover, it is recognised that the Mogden Sewerage Treatment Works discharges into the River Thames after deluges of rainwater, climate change indicates that deluges will become heavier and more frequent. There is no plan beyond 2026 as to how Thames Water proposes to deal with the increasing demand of new developments.

#### Potable Water

Potable water to Spelthorne is supplied by Affinity Water, a private utility company, across Staines, Stanwell, and Ashford, and Thames Water supplying the rest of the borough. Although the Local Plan may indicate that Spelthorne intends to build some 9,270 dwellings there is no assessment of how many people will be accommodated. There will be a mix of 1-, 2-, and 3-bedroom flats and houses. It is probably an under-estimate to assume 3 people per dwelling as an average, therefore 27,810 new residents in the borough. It is planned that these people will be limited to only 110 litres per person per day<sup>17</sup>. On that basis, we can estimate that an additional 1.2 million cubic metres of clean water will be required by 2037. However, future prolonged heatwaves as experienced this July and August will increase water consumption, not just for people, but also animals, gardens, and local agriculture. According to Affinity Water's modelling, it has capacity for a further 2,927 domestic units, and 12 mixed / retail areas (whatever that means – commercial premises?). However, roughly 78% of new developments in Spelthorne will be within the Affinity Water catchment area, or 7,230 domestic units. Well over Affinity Water's capacity. But this does not account for a 20% leakage rate. Although Water UK tells us that its water company members are committed to halving their leakage rate by 2050. Does Affinity Water's modelling make any allowance for leakage? Is their capacity for 2,927 domestic units or, allowing for loss through leakage, only 2,341? Whichever, it is grossly insufficient and disastrously unsound. Moreover, Affinity Water has admitted "In the next 5 years and beyond, there may not be enough water to meet the needs of everyone who lives in our region ... Climate change and a growing population mean that water shortages are becoming more common." "There is no set number of households that can be accommodated over the next 15 years." Or more accurately, we just don't know how many homes can be accommodated. This is not a sound policy. Continuing drought conditions in future years will seriously erode water companies' ability to meet not only current but also future increasing demand. In August 2022, this summer, we have been faced with restrictions in the current supply of potable water. What happens when Spelthorne's population has grown by 28,000 residents or more? There is a strong sense that water company executives are failing to act on leakage rates and the impacts of climate change. However, it is not a viable policy to place even greater demand on struggling water supplies until major investment and works have been completed to secure future supplies of potable water. It should be noted that Thames Water draws its supply from rivers and reservoirs, polluted rivers? Whereas Affinity Water draws its supply from aquifers, not yet polluted by fracking. 'A spokesperson for the Angling Trust said: "Let's not sugar-coat this, our rivers are dying. The situation is farcical, predictable and entirely a result of our abject failure to plan properly in this country. There hasn't been a new reservoir built in southern England since 1976, coincidentally

responding to the last major drought, yet since then millions more people are living here and using more and more water. With climate change impacts being felt here and now, the government and water companies have known this is coming. Yet they have prioritised profits over the needs of our environment and wildlife.”

In August 2022, this year, a pump failure at Thames Water’s Netley Mill left residents from over 8,000 Surrey households queuing for bottled water in Cranleigh, Guildford, Surrey Hills, Dorking and Horsham. Up to 1,000 households were without water supplies for three days. This is the state of water infrastructure and the lack of investment by Thames Water. Into these conditions it is unconscionable to build more homes and apply further stress to a system falling apart?

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Malcolm Beecher (23601825)</b>	
<b>Organisation:</b>	
<b>Response ID: 1125772</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>Spelthorne Borough consist of some 5,118 hectares of which some 3,324 hectares may be listed as Green Belt. However, 870 hectares of the recorded Green Belt is water – rivers, lakes, reservoirs, ponds - so in reality Spelthorne’s Green Belt consists of only 2,454 hectares of land. A further 256 hectares of Spelthorne is identified as water, including 12 miles of River Thames, shared with the boroughs of Runnymede and Elmbridge.</p> <p>The Local Plan proposes releasing 24.81 hectares of Green Belt (or misappropriately identified as “former Green Belt”) which is 1.01% of Green Belt, not the 0.7% as mistakenly quoted by the Council at paragraph 3.3 of the Local Plan. Before advocating any release of Green Belt, the council hired Arup, the engineering and architectural consultancy, to carry out an assessment of the ‘performance’ of several parcels of Green Belt. Where these parcels did not provide a suitable answer, they were later divided into smaller plots and re-assessed.</p>	

Measuring 'performance' of Green Belt is an interesting concept in that Green Belt land is neither active nor reactive therefore does not perform. It is just there, growing, being green, stopping urban sprawl. What is measured, in effect, is the performance of the local planning authority in its administration and protection of Green Belt. By allowing urban encroachment the local planning authority, and to some extent the planning inspectorate by allowing some appeals, Green Belt is put under pressure. Where Green Belt may have been adjudged as 'poor performing', the onus is on the local council to enhance it, make it stronger.

Spelthorne has a registered electorate of nearly 71,000. So, it can be assumed that there are at least 71,000 adult residents in the borough, out of a population just shy of 100,000 in 2020. Therefore, we can assume that there are currently roughly 29,000 children, if not in school they soon will be in a matter of a few years. The vast majority of the population, 99%, live in an urban area. Spelthorne has a population density of 2,225 per square kilometre (km<sup>2</sup>), which is rated as high. However, the rate of population growth has been in steady decline since 2012 and was at 0.03% in 2020.1

Moreover, Spelthorne's population has only grown by roughly 4,050 in the past decade. Which begs the obvious question why is Spelthorne obliged by the government to build so many new homes when the population is growing so slowly?

In 2019 according to the Office for National Statistics (ONS), the Gross Domestic Product (GDP) estimate for Spelthorne was £3.8 billion. Of the estimated 50,000 jobs in the borough, some 10.5% are in the construction industry making it the largest industrial sector. Retail is the second largest sector, followed by transport & storage, information & communications, and business administration & support.

The principal growth sectors in 2019-2020 were property and construction, and the hospitality sector (hotels and restaurants). Traditional businesses in Spelthorne, such as quarrying, logistics, and business administration are all in decline.

However, the Local Plan fails to mention this concentrating instead on developing retail space and office accommodation. But it is noticeable that several former office buildings have been converted into flats. This has become the similar fate of shops and several former engineering works. Spelthorne is losing retail space to redevelopment. The 'Debenhams' department store is the stand-out example of the decline of retail in Staines and Spelthorne generally. With declining salaries and increasing domestic costs, residents do not have the disposable income to sustain the retail sector on the High Street as online shopping expands.

Heathrow Airport is a major employer just outside the borough and its ancillary businesses clustered along the Southern Perimeter Road. However, post-Covid and recognising the impact of climate change, air travel is declining. The plans for a third runway have been shelved.

In the move away from burning fossil fuels, it will also be interesting to see how long BP will remain as a major employer within Spelthorne at Sunbury. See attached document for full response.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Yes, I wish to participate in hearing session(s)



<b>Respondent: Mr Malcolm Beecher (23601825)</b>
<b>Organisation:</b>

<b>Response ID: 1121163</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Climate Change It is one of those quirks of science to confuse young children and some adults that the temperature of the planet Venus is hotter than the planet Mercury, even though Mercury is closer to the source of heat, the Sun. This is because Venus has an atmosphere of Carbon Dioxide (CO2), a 'greenhouse gas' that allows the planet to retain heat. As we release more greenhouse gases, such as CO2, carbon monoxide (CO) and methane (CH4), into the Earth's atmosphere this planet, our home, retains more heat – global warming. Concentrations of CO2 fluctuate throughout the year, but progressively rise each year. Around the middle of the last Ice Age, some 20,000 years ago, CO2 concentrations were around 150 parts per million (ppm). Over the course of several thousand year as we changed our civilisations from hunter-gathering to agrarian, the concentration of CO2 in the atmosphere rose from around 260 to

280 ppm, where it stayed until the mid-18<sup>th</sup> century. As the Industrial Revolution kicked off so CO<sub>2</sub> concentrations began to rise. And after the Second World War concentrations began to accelerate.

In 1961 CO<sub>2</sub> concentrations were measured at 315 ppm. In the last 50 years, CO<sub>2</sub> concentrations in the atmosphere have risen by over 100 ppm. The highest ever concentration recorded, within the existence of the human species, was recorded on 26 April 2022, this year, as 422.06 ppm at the National Oceanic and Atmospheric Administration's (NOAA) Mauna Loa Observatory, Hawaii. Each year, concentrations of CO<sub>2</sub> rise by an average of 3ppm. Not so slowly and steadily the planet is warming. There is some disagreement as to how much the planet's average temperature has risen since 1750, is it by 1.16oC or 1.2oC? As the atmosphere and oceans get hotter, the conditions are created by which the climate is changing. Hotter air can hold more water, it can be more violent, so we experience stronger winds and heavier rains (there are more Category 5 typhoons and hurricanes each year, and meteorologists may have to introduce Categories 6 and 7 to record the more destructive wind speeds). Britain has experienced more violent storms and heavier downpours or deluges, with resultant flash flooding. We can all remember the news reports from 12 July 2021 as rainwater floods down steps into London Underground stations. Nearly 76mm of rain fell in just 90 minutes on Kensington and Chelsea. Just five days later this was repeated causing flooding along the Portobello Road to a depth of nearly half a metre. Earlier that July, just last year, other parts of England had been flooded by similar deluges.

These storms then moved east to devastate parts of western Europe. And this July 2022, we have witnessed drought and heatwaves when on 19 July a new record for the hottest temperature in Britain was set, 40.3oC at RAF Coningsby, Lincolnshire. Slightly earlier that day Heathrow reached 40.2oC. And western Europe has witnessed heatwaves and devastating wildfires this summer. Even residents of parts of London, particularly Wennington, have experienced the destructive force of a wildfire.

Spelthorne Borough Council along with every other borough and district council is obligated to work towards achieving the Government's target of net-zero by 2050. Under the provisions of the Climate Change Act 2008 (2019), Spelthorne Borough Council is expected to reduce its overall carbon emissions by achieving intermediate set milestones. From a baseline in 1990 the first milestone was a 44% reduction by 2019, which the Government declared a success – from implementing reductions in the 'low-hanging fruit' by curbing generating electricity using coal. The next major milestone is to achieve a 78% reduction by 2035. In 2019, Spelthorne's carbon emissions were 390,137 tonnes CO<sub>2</sub>e [includes all greenhouse gas emissions measured at their equivalence to Carbon Dioxide – CO<sub>2</sub>e]. Therefore by 2035, Spelthorne's carbon emissions should be reduced to 153,268 tonnes CO<sub>2</sub>e. Spelthorne Borough Council has little control over carbon emissions within the borough – beyond its own buildings and fleet of vehicles.

Policy 'PS1: Responding to the climate emergency' looks forward to lowering carbon emissions in the use and occupation of buildings, but the Local Plan fails to recognise and respond to embedded carbon emissions in the construction of buildings.<sup>22</sup> The construction of new homes costs between 50 and 80 tonnes of CO<sub>2</sub> for each unit. Standard brick-built houses cost over 50 tonnes of CO<sub>2</sub>, whereas a unit in a high-rise development will cost a lot more because of the additional steel and concrete required. The construction of 9,270 dwellings will create over 648,900 tonnes of CO<sub>2</sub>. This figure does not include the additional carbon emissions from the occupation and use of these new dwellings. This is just the impact of the build.

When we add in the carbon emissions from occupation and use of these new homes this will become a cumulative annual figure not just for the homes occupied that year but also those occupied in previous years, it becomes a rolling increase. There is no such thing currently as a completely zero emissions home. Improvements in energy efficiency have reduced domestic carbon emissions by 50%. Each year the carbon emissions from the homes newly occupied will add over 3,000 tonnes of CO<sub>2</sub>. And the next year another 3,000 tonnes, totalling 6,000 for that year. And the following year another 3,000 tonnes, now 9,000 tonnes for the year, and so on increasing by over 3,000 tonnes every year indefinitely. Carbon emissions from the 9,270 new homes will have added over 40,000 tonnes of CO<sub>2</sub> over the life of the Local Plan, by 2037, but they will continue to increase by 40,000 tonnes every year thereafter.

Just the construction of 618 dwellings each year alone will mean that at least an additional 43,260 tonnes of CO<sub>2</sub> will have to be reduced from Spelthorne's existing carbon budget by the borough's existing polluters. As existing annual carbon emissions need to be reduced from 390,137 tonnes CO<sub>2</sub>e per year (2019) to 153,268 tonnes CO<sub>2</sub>e per year (2035) the Local Plan is adding 43,260 tonnes CO<sub>2</sub>e every year. This is just the impact of the construction.

In order to get from 390,137 tonnes CO<sub>2</sub>e (as in 2019) to a target reduction of 153,268 tonnes CO<sub>2</sub>e (in 2035) requires actions to produce an annual reduction of 15,800 tonnes CO<sub>2</sub>e, the equivalent of taking roughly 9,300 cars in Spelthorne off the road each year. However, the proposed Local Plan 2022-2037 plans to add 43,260 tonnes CO<sub>2</sub>e to Spelthorne's carbon budget each year from just the building of 618 new homes, or the equivalent of putting an extra 25,500 petrol-engine cars back onto Spelthorne's roads. And this is a conservative estimate, it will be worse.

Moreover, the Government's policy to build 300,000 new homes every year for the next five years will demand an increase in carbon emissions by over 355 million tonnes. This would see an annual increase in Britain's carbon emissions greater than the carbon budgets of Austria, Hungary, Sweden, Norway and Finland, and more than ten times the carbon budget of Botswana.

So, the existing population of 100,000 resident and the businesses that operate within Spelthorne who in 2019 were producing 390,137 tonnes of CO<sub>2</sub>e annually will have to reduce their carbon emissions by not just 15,800 tonnes each year but some 59,000 tonnes CO<sub>2</sub>e to mitigate the carbon emissions from implementing the Local Plan. If we add to that the increasing quantity of CO<sub>2</sub> emitted by people living in these new homes, the total addition to Spelthorne's carbon budget from the Local Plan will be roughly 900,000 tonnes. So, effectively the current residents and businesses in Spelthorne will need to reduce their annual carbon emissions by some 75,800 tonnes of CO<sub>2</sub>e.

Alternatively, we could launch a tree planting programme to offset the carbon emissions for the new builds demanded by the Local Plan. Given that it takes on average one tree 100 years to absorb 1 tonne of CO<sub>2</sub>, it will take 6-7 trees the 15 years of the span of the Local Plan to offset that one tonne, we cannot wait the full 100 years for each tree to reach maturity. So, we would need to plant some 6.5 million trees to absorb all the carbon generated by building 9,270 new homes and their occupants. We will have to plant at least 435,000 trees each year. Using the Forestry Commission standard to plant 2,500 trees per hectare. Therefore, we would need 174 hectares of clear land for tree planting each year. Over the life of the Local Plan, 15 years, that would equate to a land need of 2,610 hectares for tree planting, which will become new woodland. Spelthorne only has 2,454 hectares of Green Belt land, excluding the land that is not already parkland, woodland, moorland, common land, farmed, or

otherwise already major sequesters of carbon emissions. It can't be done. Moreover, we will require additional water resources to ensure and maintain growth.

A sustainable housing 'target' should identify how much Green Belt and other green spaces can be given over to tree planting to offset the carbon emissions from building new homes. However, more than likely, we will need these new woodland areas to offset existing carbon emissions to meet our Climate Change obligations.

The National Planning Policy Framework (NPPF) as revised in July 2021 states at paragraph 153, under the heading 'Planning for climate change' that: "Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures."

Footnote 53 is significant in that it states: "In line with the objectives and provisions of the Climate Change Act 2008." Therefore, in applying the provisions of the NPPF, we need to apply the Climate Change Act 2008. The Local Plan should set out how Spelthorne Borough Council will reduce carbon emissions in compliance with the Climate Change Act 2008, not just set out a policy of wistful aspirations. How will Spelthorne Borough Council mitigate the carbon emissions from building 618 new dwellings each year over the next 15 years? There is no plan. Spelthorne Borough Council will not meet its legal obligations under the Climate Change Act 2008. The legality of the Local Plan must be questioned. The Local Plan neither conforms to the NPPF nor to the Climate Change Act 2008.

If Spelthorne Borough Council is to comply with its legal obligation to reduce carbon emissions as set out in the Climate Change Act, the Local Plan 2022-2037 approach to the climate emergency fails even before the plan can be adopted. Policy PS1 is unsound and worthless. Where are the mitigation actions to accommodate rising temperatures, preparing health services for extreme heatwaves, preparing for more extreme weather events, preparing a drainage network for flash flooding, ameliorating drying local rivers and ditches, responding to the loss of biodiversity, securing water supplies, and planned response to potential wildfires across Staines Moor and Shortwood Common, and the new woodland plantations to offset carbon emissions? But Spelthorne Borough Council will have photovoltaic cells on the roofs of its buildings and its refuse collection fleet powered by batteries.

In conclusion, the Local Plan 2022-2037 does not support "sustainable growth of Spelthorne in a planned way, which benefits our communities, environment and economy." The existing local infrastructure both now and in the planned future does not support the quantity of planned housing development. The demands on water supplies and electricity have not been addressed. The Local Plan is not supported by the local community. Residents in Staines have objected to proposed highrise development in the town, which has been addressed by the Staines Development Framework by zoning development. However, the Local Plan looks to build well over half of the housing need in the town. Placing unsustainable demands on the infrastructure in Staines. Across the borough local communities have objected to developments on Green Belt, which is proposed by the Local Plan. The impact to the environment is not sustainable. Increasing carbon emissions by over 1 million tonnes of CO<sub>2</sub>e is unsupportable and makes Spelthorne's commitment to meeting our obligations under the Climate Change Act 2008 impossible. Although increasing the construction sector across Spelthorne may sustain the local economy in the short-term, it is not a sound and sustainable approach in the medium- or long-term. The remedial costs to preserve and recover the environment will easily outstrip the benefits of just building dwellings to watch the profits disappear out of the borough (and possibly

out of the country). Spelthorne will not garner much financial benefit from council tax, Community Infrastructure Levy fees, and local retail spending to remediate the impacts of climate change – drought, heatwaves, wildfires, flooding, poor air quality, and destruction of the environment. The Spelthorne Local Plan, by concentrating on just blindly building dwellings because the government tells it to, is unsustainable. The Plan fails to ensure that sufficient infrastructure has been developed and is in place to meet the consequence of this over-development. And the Plan fails to take action to ensure we meet our legal obligations under the Climate Change Act. See attached for full response.

**Question 6:** You can upload any modifications below.

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<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/596094/PDF/-/Pre%2DSubmission%20Spelthorne%20Local%20Plan%20%2D%20Review%20MB%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Malcolm Beecher (23601825)</b>	
<b>Organisation:</b>	
<b>Response ID: 1121133</b>	
<b>Policy / Evidence Base / Part of Plan: Policy SP1: Staines-upon-Thames</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
<p>Staines</p> <p>Most of the development units currently under construction 792, as per paragraph 3.8 of the Local Plan, are being built in Staines. Together with 57.6% of allocated sites located in the three Staines wards, Staines Town, Staines South and Riverside &amp; Laleham. Moreover, it is safe to assume that the proportion of Brownfield Tier 2 sites located in Staines is greater than half of the borough total. All in all, Staines is expected to accommodate well over half of the new construction in the borough. And these are all within Staines Town ward In 2021, the housing stock in Spelthorne was 42,870 with population of 99,8737, or an average of 2.3 people per household. This average seems a safe assumption to carry forward.</p>	

Therefore, the additional 9,270 homes identified in the Local Plan will be expected to house an additional 21,328 residents. Of whom some 58% could live in Staines, increasing the town's population to over 37,500 which is a 49% increase on the current population. Or half as many again. This does not make any allowance for the town's existing and strained infrastructure.

Policy 'PS1: Responding to the climate emergency' looks forward to lowering carbon emissions in the use and occupation of buildings, but the Local Plan fails to recognise and respond to embedded carbon emissions in the construction of buildings.<sup>22</sup> The construction of new homes costs between 50 and 80 tonnes of CO<sub>2</sub> for each unit. Standard brick-built houses cost over 50 tonnes of CO<sub>2</sub>, whereas a unit in a high-rise development will cost a lot more because of the additional steel and concrete required.<sup>23</sup> The construction of 9,270 dwellings will create over 648,900 tonnes of CO<sub>2</sub>. This figure does not include the additional carbon emissions from the occupation and use of these new dwellings. This is just the impact of the build.

Please see attached document for full response and provide summary

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Malcolm Beecher (23601825)</b>
<b>Organisation:</b>

<b>Response ID: 1121159</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy SP6: River Thames and its Tributaries
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Flooding The River Thames Scheme should alleviate the prospect of major flooding in Staines from the River Thames. However, this is not the most likely cause of flooding within the borough. With the impact of climate change sudden and heavy downpours on dry or concreted ground into which rainwater cannot be absorbed is the most frequent cause of flooding in the borough. The A308 frequently floods following heavy rains. If rainwater cannot get into the ground quickly enough along tree root structures, it is forced to collect on the surface and look for basements, drainage sumps, and through cracks and potholes in local roads.



Developments are expected to meet surface water run-off by means of Sustainable Drainage Systems (SuDs). However, there is no policy to restrict or prevent residents concreting over front gardens, where there are only out-dated drains with limited capacity to cope with a deluge and so give rise to local flooding.

See attached document for full response.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Malcolm Beecher (23601825)</b>
<b>Organisation:</b>

<b>Response ID: 1121160</b>
<b>Policy / Evidence Base / Part of Plan: Policy E3: Managing Flood Risk</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Flooding The River Thames Scheme should alleviate the prospect of major flooding in Staines from the River Thames. However, this is not the most likely cause of flooding within the borough. With the impact of climate change sudden and heavy downpours on dry or concreted ground into which rainwater cannot be absorbed is the most frequent cause of flooding in the borough. The A308 frequently floods following heavy rains. If rainwater cannot get into the ground quickly enough along tree root structures, it is forced to collect on the surface and look for basements, drainage sumps, and through cracks and potholes in local roads.

Developments are expected to meet surface water run-off by means of Sustainable Drainage Systems (SuDs). However, there is no policy to restrict or prevent residents concreting over front gardens, where there are only out-dated drains with limited capacity to cope with a deluge and so give rise to local flooding.

See attached document for full response.

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<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/596053/PDF/-/Pre%2DSubmission%20Spelthorne%20Local%20Plan%20%2D%20Review%20MB%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Malcolm Beecher (23601825)</b>	
<b>Organisation:</b>	
<b>Response ID: 1121135</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ID1: Infrastructure and Delivery</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Infrastructure Delivery With the enlarged population across Spelthorne and particularly in Staines, there will be an increased demand for infrastructure improvements. The delivery of these improvements needs to be ahead of the construction of housing to avoid problems and shortages. Or housing developments could grind to a halt for the lack of necessary infrastructure. Without guaranteed improvements in the borough's infrastructure provisions, the Local Plan cannot be considered as sound. Do education facilities, healthcare, emergency services, transport, and utilities support not only the current population but also the future population as well and across the whole of the borough not just in certain towns, or villages? See attached document for full response.	
<b>Question 6: You can upload any modifications below.</b>	

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<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/595879/PDF/-/Pre%2DSubmission%20Spelthorne%20Local%20Plan%20%2D%20Review%20MB%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Malcolm Beecher (23601825)</b>
<b>Organisation:</b>

<b>Response ID: 1121151</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ID1: Infrastructure and Delivery
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
<p>Transport</p> <p>Spelthorne Borough Council is not the transport authority for the borough and has little or no control over future transport provision. Surrey County Council is the local transport authority, but Spelthorne also receives buses from Transport for London (TfL) and rail services from South West Railways. Surrey County Council has set out its own ambitious aspirations to reduce carbon emissions, 46% of which across the county come from road traffic.10 Statistics for car ownership across the county show that Surrey households have access to 687,000 cars, some 46% of households own two or more cars, and only 13% of households have no access to a car. Car ownership in Spelthorne averages at around 1.5 cars per household. With those statistics it seems ridiculous that Spelthorne council promotes developments that fail to supply sufficient parking space for even one vehicle, car or van, per household. If households across Spelthorne have 1.5 cars each, it is because experience has shown families that they need</p>

mote than one car on average.

With over 70% of commuting in Spelthorne by car or van. Spelthorne has the second largest use of road vehicles to get to work of all Surrey's boroughs and districts. Much of that demand is to get to work in and around Heathrow. Just not making sufficient allowance for parking provision is not going to persuade residents to give up vehicle ownership. How else can they get to work? But it will lead to even greater parking congestion in narrow local streets, not a worry for developers.

The dependence upon cars and vans for commuting in Spelthorne is no surprise. The proximity of Heathrow Airport and all the ancillary services around the southern perimeter require a lot of workers from Spelthorne. Many are shift workers who cannot rely upon public transport because of early starts and late finishes. (See attached document for relevant table, page 9).

The above figures for rail passenger usage at the four stations in Spelthorne are totals for the year 1 April through to 31 March. The count is by entry and exit through the ticket barriers.

We can assume that the vast majority of these trips are commutes, there will be exceptions for day trips into London and other visitor attractions, Thorpe Park and Windsor, and trips to sporting venues. We could divide the total recorded passengers by 520 (for simplicity, that is two commutes on the average number of working days, with no allowance for holidays). It is a rough estimate, but pre-Covid total passenger numbers across Spelthorne were around 9,000. These will include a good number of school students as well as adult workers. Rail services across Spelthorne are generally restricted to into and out of London Waterloo. Going the other way can take the traveller from Staines, the busiest station, to Windsor, Reading and, for the adventurous, even as far as Portsmouth. If you want to go anywhere else, north or south, you need a car.

Moreover, increasing ticket prices above the rate of inflation discourages rail use except for essential commuting. The impact of working from home and the change in working practices away from daily commuting has yet to be fully understood since the Covid pandemic. Rail companies have responded by introducing more flexible ticketing. But it seems unlikely that passenger numbers will recover to pre-pandemic rates. We have already seen a reduction in services to London by South West Railways. The housing need for London commuters would appear to be in decline.

Surrey County Council as the Local Transport Authority only has plans to contribute £1m over the foreseeable future to the development of bus infrastructure in North-West Surrey (Spelthorne) and that development is associated with improved connectivity with Heathrow. Additional funding is expected to come from central government, which would appear unlikely in the near to mid future. Any works will involve junction improvements, bus lanes, and bus-priority traffic signals, not services and routes. These improvements will not get more people onto buses while ticket prices are too high, and routes and timetables do not meet customer needs. Moreover, there is the ongoing threat of withdrawal of some unprofitable services.

If we are to encourage people to step away from private vehicle ownership, we need to improve bus services and make them affordable. This is unlikely to happen when the bus services are required to make a profit for the service providers. It will certainly not happen if the planned reduction in car ownership is simply encouraged by the lack of available parking provision. More buses will find their routes blocked or congested with parked cars.

Utilities

The Infrastructure Delivery Plan is more aspirational than a plan to deliver. There are no details as to how utility suppliers will meet Spelthorne Borough Council's increasing demand for electricity and water. There is barely any recognition of the size of the problem. And as we move away from fossil fuels there ought not to be any significant increase in gas demand, if any. Moreover, utility demand is assumed in isolation from what may be going on in neighbouring boroughs.

#### Electricity

We are already seeing the effects of the lack of investment in the electricity infrastructure by the privatised power supply companies. The Greater London Authority (GLA) has advised developers in the London Boroughs of Hillingdon, Ealing, and Hounslow, two of which border with Spelthorne, that there may not be sufficient capacity for new connections until 2035.

Why should the grid capacity be any better just across the border in Spelthorne? This question is not addressed in the Infrastructure Delivery Plan. Indeed, a restriction of supply could push housing and technology business development, which caused the problem in London, into Spelthorne. It should be noted that of the three Grid Supply Points identified in the Infrastructure Delivery Plan supply the whole of Surrey, but only Laleham is in Spelthorne borough, neighbouring boroughs will have their own increasing demands from their Local Plans. We must not assume that there will be any spare capacity from other Grid Supply Points. Moreover, when the enlarged Shepperton Studios comes on-stream, with double the capacity, it is likely to become a major consumer of power in the future. It should be anticipated that Shepperton Studios will also bring ancillary businesses and support services into the borough.

We must also assume that the 9,270 new build properties in the Local Plan will not consume any additional fossil fuels and will only use electricity. Depending upon the size and energy efficiency of each property they would be expected to consume between 11,000 kWh and 18,000 kWh annually. By 2037, when the 9,270 new electric only properties have been built, the increased demand on local power consumption will be roughly 370 MWh daily. That is over and above the present demand and does not include any additional business development and Shepperton Studios.

Moreover, this does not account for electric vehicle (EV) usage which will only increase. As we wean ourselves off fossil fuels, there will be a serious uptake in EVs. The proposed expansion by TfL of the Ultra-Low Emission Zone (ULEZ) across the Greater London Authority (GLA) by the end of August 2023 will encourage more people to buy an EV. Not to mention a desire to avoid rising petrol prices.

If in 2019, Spelthorne had an adult population of around 71,000 (based on registered electors) and each new property brings in 2 adults, on average, then by 2037 the adult population of Spelthorne will be closing on 90,000. If, say, only half the population owns or uses a private electric vehicle there could well be some 45,000 EVs needing power. Of course, there will be some fossil fuel guzzling vehicles but let us assume that Spelthorne has gone Green. EVs will not be charged daily, but we can average the demand daily because not everyone will charge their EV at the same time. According to the RAC Foundation, a new car averages 28 miles (45 kilometres) per day.<sup>15</sup> For an average EV that is equivalent to 9 kWh of electricity. With 45,000 EVs in Spelthorne by 2037 this creates a power demand of 405 MWh. There appear to be no plans to deliver that demand through any network of charging points. A recent planning application to set up an EV charging station in Spelthorne was rejected by the Local Planning Authority.



By 2037, there will be an increased demand for electricity of over 775 MWh daily. We can only assume that neighbouring boroughs will have similar demands. The aggregate demand across the three Grid Supply Points is 759.9 MW in the winter, which is predicted to rise to 878.2 MW. Of which a third will pass through the Laleham GSP, some 253.3 MW. If we assume that the 253.3 MW is the current demand for Spelthorne. Therefore, by 2037 the demand will exceed 1,028 MW. The existing capacity across all three GSPs is 1,797 MW, but only a third, or 599 MW, can safely be attributed to the Laleham GSP. By 2037, Spelthorne will demand more than the grid can deliver, without significant development. Spelthorne will find itself then in a similar condition to that of Hillingdon, Hounslow, and Ealing now.

Furthermore, as the impact of climate change develops, and our summers get longer and hotter there will be an increasing demand on power from existing properties and some 'new' developments for domestic air-conditioning units. This has not been factored into future demand. However, on a small bright side some of this additional power demand will be met locally through PV cells and enterprising domestic wind turbines. But nowhere near the capacity that future developments will need.

There are no guarantees that there will be sufficient power available to implement Spelthorne's Local Plan. So, it would seem that as far as future electricity demand goes, the Local Plan is not sustainable, or sound.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Malcolm Beecher (23601825)</b>	
<b>Organisation:</b>	
<b>Response ID: 1121156</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ID1: Infrastructure and Delivery	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>Water &amp; Sewerage</p> <p>Sewerage</p> <p>Thames Water is responsible for sewerage and drains. There has been little or no investment in the infrastructure for Spelthorne’s sewerage and drains. Although, Thames Water has stated an investment of £31 million to up-grade its Mogden Sewerage Treatment Works, there has been no investment in the drains and sewerage pipelines that feed the plant. All the investment is within the plant boundaries. It is generally assumed that if one connects into the existing drainage network it will cope. There is no proof that it can or will cope.</p> <p>In 2013, Thames Water was fined some £41,000 for illegally discharging and polluting the River Ash. More recently, this July, Thames Water has again discharged into the River Ash causing flooding of local properties. There has been a history of Thames Water discharging into both the River Thames and</p>	

the River Ash, in 2015, 2017, and 2020. We can add 2022, even if Thames Water refuses to answer the phone calls from the Environment Agency. If this is the situation with the existing population of 99,873, how are we to expect Thames Water to cope with the effluent of an extra 27,810 people? Moreover, it is recognised that the Mogden Sewerage Treatment Works discharges into the River Thames after deluges of rainwater, climate change indicates that deluges will become heavier and more frequent. There is no plan beyond 2026 as to how Thames Water proposes to deal with the increasing demand of new developments.

#### Potable Water

Potable water to Spelthorne is supplied by Affinity Water, a private utility company, across Staines, Stanwell, and Ashford, and Thames Water supplying the rest of the borough. Although the Local Plan may indicate that Spelthorne intends to build some 9,270 dwellings there is no assessment of how many people will be accommodated. There will be a mix of 1-, 2-, and 3-bedroom flats and houses. It is probably an under-estimate to assume 3 people per dwelling as an average, therefore 27,810 new residents in the borough. It is planned that these people will be limited to only 110 litres per person per day<sup>17</sup>. On that basis, we can estimate that an additional 1.2 million cubic metres of clean water will be required by 2037. However, future prolonged heatwaves as experienced this July and August will increase water consumption, not just for people, but also animals, gardens, and local agriculture. According to Affinity Water's modelling, it has capacity for a further 2,927 domestic units, and 12 mixed / retail areas (whatever that means – commercial premises?). However, roughly 78% of new developments in Spelthorne will be within the Affinity Water catchment area, or 7,230 domestic units. Well over Affinity Water's capacity. But this does not account for a 20% leakage rate. Although Water UK tells us that its water company members are committed to halving their leakage rate by 2050. Does Affinity Water's modelling make any allowance for leakage? Is their capacity for 2,927 domestic units or, allowing for loss through leakage, only 2,341? Whichever, it is grossly insufficient and disastrously unsound. Moreover, Affinity Water has admitted "In the next 5 years and beyond, there may not be enough water to meet the needs of everyone who lives in our region ... Climate change and a growing population mean that water shortages are becoming more common." "There is no set number of households that can be accommodated over the next 15 years." Or more accurately, we just don't know how many homes can be accommodated. This is not a sound policy. Continuing drought conditions in future years will seriously erode water companies' ability to meet not only current but also future increasing demand. In August 2022, this summer, we have been faced with restrictions in the current supply of potable water. What happens when Spelthorne's population has grown by 28,000 residents or more? There is a strong sense that water company executives are failing to act on leakage rates and the impacts of climate change. However, it is not a viable policy to place even greater demand on struggling water supplies until major investment and works have been completed to secure future supplies of potable water. It should be noted that Thames Water draws its supply from rivers and reservoirs, polluted rivers? Whereas Affinity Water draws its supply from aquifers, not yet polluted by fracking. 'A spokesperson for the Angling Trust said: "Let's not sugar-coat this, our rivers are dying. The situation is farcical, predictable and entirely a result of our abject failure to plan properly in this country. There hasn't been a new reservoir built in southern England since 1976, coincidentally

responding to the last major drought, yet since then millions more people are living here and using more and more water. With climate change impacts being felt here and now, the government and water companies have known this is coming. Yet they have prioritised profits over the needs of our environment and wildlife.”

In August 2022, this year, a pump failure at Thames Water’s Netley Mill left residents from over 8,000 Surrey households queuing for bottled water in Cranleigh, Guildford, Surrey Hills, Dorking and Horsham. Up to 1,000 households were without water supplies for three days. This is the state of water infrastructure and the lack of investment by Thames Water. Into these conditions it is unconscionable to build more homes and apply further stress to a system falling apart?

see attached document for full response.

**Question 6:** You can upload any modifications below.

Pre-Submission Spelthorne Local Plan - Review MB.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/596034/PDF/-/Pre%2DSubmission%20Spelthorne%20Local%20Plan%20%2D%20Review%20MB%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mark Behrendt (19538401)</b>
<b>Organisation: Home Builders Federation</b>

<b>Response ID: 1120381</b>	
<b>Policy / Evidence Base / Part of Plan: Sustainability Appraisal; Duty to Cooperate</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Not Positively, Prepared Not Justified, Not Effective, Not Consistent with National Policy	Additional Comments: Not Positively, Prepared Not Justified, Not Effective, Not Consistent with National Policy
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Not Positively, Prepared Not Justified, Not Effective, Not Consistent with National Policy 43. At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF. In particular we consid
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Not Positively, Prepared Not Justified, Not Effective, Not Consistent with National Policy.	Additional Comments: No Not Positively, Prepared Not Justified, Not Effective, Not Consistent with National Policy.
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No	

44. Finally, the Council will need to ensure prior to submitting the plan that it has sufficient evidence to support its assertion that it has met its duty to co-operate. At present the Council lacks the necessary statements of common ground that show how it has considered the strategic issues of unmet housing needs in neighbouring areas and without these the Council will find it difficult to show how the plan has been prepared in line with the relevant legislation. 45. I can also confirm that the HBF would like to attend participate in the public hearings in order to put forward the concerns of our members with regard to the Spelthorne Local Plan.

Duty to co-operate 2.

2. Paragraph 33A of the Town and Country Planning Act 2004 requires plan making authorities to engage constructively, actively and on an ongoing basis as part of the preparation of the local plan in relation to strategic matters. In order to show how the Council has co-operated in the preparation of the local plan, and will cooperate in its implementation, they are required by the National Planning Policy Framework to prepare statements of common ground (SoCG) with the relevant authorities identify the key issues where co-operation is required and what has been agreed and where there is disagreement in relation to those strategic matters.

3. One such matter, as recognised by Spelthorne in their Duty to Co-operate Statement of Compliance is the issue of housing needs. However, in its consideration of this issue in section 4 of the duty to co-operate statement no mention is as to the scale of unmet needs in other areas. Whilst the potential for unmet needs in Elmbridge Borough Council (EBC) are mentioned in section 3 the issue is then not raised later as a strategic issue. Even more concerning no mention is made of the identified shortfall in new homes in London between 2018 and 2028 that was identified during the examination of the London Plan. We consider these matters in turn below.

4. It is evident from the Duty to Co-operate compliance Statement that the Council disagrees with Elmbridge's chosen strategy not to amend Green Belt boundaries and that it has urged Elmbridge to consider alternative strategies to meet needs. As Planning Practice Guidance notes in paragraph 61-022 local planning authorities may not reach agreement on some matters. However, where there is disagreement, the Council must set these out clearly in a SoCG not only where the parties disagree but also whether they have done all they can to try and address the strategic matter through effective joint working.

5. The Council will therefore need to update its Statement of Common Ground (SoCG) with EBC, the latest iteration does not appear to have been amended since 2018, prior to submitting its local plan clearly setting out where they disagree, how it has approached this matter and whether it considers EBC's approach to cooperation on this matter to have been constructive, active, and on-going. A failure to produce an updated SoCG would indicate that co-operation between both SBC and EBC has not met the requirements of the legislation.

6. The updated SoCG should indicate that every effort was made to resolve the situation. For example, SBC will need to show that on being notified that Elmbridge could not meet their own housing needs whether they revisited their own assessments to consider whether they could provide assistance. Alternatively, if SBC consider that the EBC local plan to be unsound and that they can meet needs it must actively oppose this through the examination in public of that plan. Either way It is necessary to show in the evidence supporting the submitted local plan that proper consideration was given by officers and councillors to the latest position presented to SBC by EBC and that appropriate actions were taken in response. We recognise that the Council has

responded previously that it could not provide any support on housing needs and that it is not obliged to accept needs where these would have an adverse impact when assessed against the policies in the NPPF . However, given that the duty to co-operate is an ongoing requirement of plan making, it is important that the Council acted on the new information.

7. The issues relating to co-operation with Elmbridge is with regard to SBC's response to EBC's changing position on meeting housing needs. With regard to London the issue is a failure to properly consider identified unmet needs in the first instance. No reference is made in the Duty to Cooperate compliance statement to the significant level of unmet needs across the capital. It is important to recognise when considering unmet needs in the capital that London is a single housing market area. As such it is necessary for those authorities adjoining the capital to take account of the unmet needs of this neighbouring area and not just the London Boroughs with which it shares a border.

8. Over the next ten years there is projected to be a shortfall of 14,000 homes per annum in the capital that resulted from the over assessment of delivery from small sites and the subsequent amendments by the Panel examining the London Plan. Whilst the mayor intends to produce a revised London Plan before the termination date of the new London Plan with revised targets, the constraints on the capital will continue make it very difficult for the city's needs to be met in full and it will be important for areas that adjoin London, such as Spelthorne, to consider how it could increase its own housing supply to address some of these unmet needs.

9. No recognition is given to the fact that the GLA informed Council's across the South East that it could not meet need and was seeking willing partners to provide support. This position is set out in paragraph 2.3.4 which states:

"... the Mayor is interested in working with willing partners beyond London to explore if there is potential to accommodate more growth in sustainable locations outside the capital ...".

So, whilst there may have not been a direct plea for assistance there was a clear call for support that the Council should have been aware of and which should have formed part of its duty to co-operate considerations, and any subsequent decision making by the Council on housing needs and supply. Without any in depth consideration of London's unmet needs we would suggest that co-operation on this matter has been neither active, constructive, or ongoing. It appears to have been consigned in the box marked too difficult and ignored. The focus in its cooperation with the GLA and London Boroughs has been on whether they have capacity to support SBC to meet its needs with no consideration as to the consequences of London's unmet needs on SBC and whether the Council should increase its housing requirement in line with paragraph 61 of the NPPF.

10. To conclude, if the objective of co-operation is to maximise the effectiveness of a local plan it cannot merely ask the question as to whether others can meet their needs it must also be an ongoing consideration as to whether they can do more to support other authorities and to test such scenarios through its Sustainability Appraisal. The Council has undertaken the former, but it has not properly considered the impact of unmet needs in neighbouring areas on Spelthorne and whether they could now, after rejecting its ability to do so relatively early in the plan making process, do more. In order to be effective co-operation must ensure that there is some feedback into the process of plan preparation. Without this the process is merely a tick box exercise and an exchange of correspondence and cannot be considered to be active or constructive as is required by 33A of the Town and County Planning Act 2004 (local development).

#### Sustainability Appraisal

11. As part of the Sustainability Appraisal of the local plan the Council are required to consider reasonable alternatives with regard to the strategies and policies that are taken forward. With regard to the spatial strategy a number of alternatives were considered in the SA of the Preferred Options consultation of plan preparation including an option for an upward adjustment to housing needs in to order to support other authorities. This option was rejected on the basis that it would have a significant negative impact on the environment and may result in unsustainable development. However, considering these options it must be noted that they were not related to any particular spatial strategy or expected distribution of growth. The assumption made by the council is that any strategy that went above and beyond minimum needs would be less sustainable than one that met housing needs.

12. The high degree of supposition in its consideration of the options can be seen in its assessment of H1 in the Preferred Options SA on pages 58 to 63. Throughout this assessment the Council states that option 3 “may” have an impact, but without a corresponding spatial strategy outlining how higher needs would be met we would argue that the Council cannot reasonably state whether some of the negative impacts in relation to, for example, health and well-being, flooding, air and noise pollution, biodiversity, and heritage, would actually occur if the Council went beyond minimum housing requirements. The option of going beyond minimum housing needs was, we would suggest, discounted too early in the plan making process. As the plan progressed and sites were identified there may have been sustainable opportunities to go beyond the minimum requirement. However, these would have been rejected as being unsustainable purely because they went beyond the Council’s minimum housing requirement.

13. The rejection of sites on this basis described above can be seen in the Officer Site Assessment of Discounted Alternative Allocation Sites (2022) which seemingly rejects sites that meet the spatial strategy. For example, HS1/010 appears to have been rejected because it is a larger site when compared to other available options and that it received largely negative feedback. However, the site is in weakly performing Green Belt and in terms of its Sustainability Appraisal and size is not dissimilar to that for the allocated site SN1/006. The HBF is not promoting this or any other site and is purely using this as an example to show that opportunities are present to go beyond minimum needs within the Council’s spatial strategy. However, in discounting the possibility of going beyond needs early in the plan making process the Council has fixated on meeting its minimum requirement and in the process discounted sustainable development opportunities.

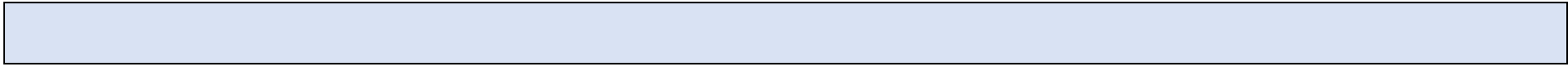
14. The considerations in the SA of the preferred options have ultimately led to a local plan that only seeks to meet its minimum requirement with no consideration as to whether the chosen spatial strategy, or an alternative strategy, could sustainably deliver more homes than this minimum. The effect of rejecting the option of going beyond minimum development requirements at the early stage was to neuter considerations at a later stage of including suitable sites in order to support other areas meet their needs or to better address the need for affordable housing in the Borough and means that the SA is fundamentally flawed in its consideration of housing needs and supply in ST2 and H1.

**Question 6:** You can upload any modifications below.

HBF rep Spelthorne Reg 19 Sept 2022 2\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618695/PDF/-/HBF%20rep%20Spelthorne%20Reg%2019%20Sept%202022%202%5FRedacted%2Epdf>





<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mark Behrendt (19538401)</b>
<b>Organisation: Home Builders Federation</b>

<b>Response ID: 1120382</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not justified, Not effective, Not consistent with national policy - were all selected. Policy is unsound as it is inconsistent with national policy and is not justified.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Housing requirement. 15. The HBF agree that the minimum number of homes that the Council should be planning for is 618 dwellings per annum (dpa). However, we disagree with the plan period and as such the total number of homes that should be planned for based on the minimum requirement. Paragraph 22 of the NPPF requires strategic policies in local plans to look ahead over a minimum timeframe of 15 years from the point at which the plan is adopted. From submission it is reasonable to assume that it will take at least 18 months before the plan to be adopted. 16. Therefore, if the plan is submitted at the start of 2023, it is highly unlikely to be adopted before the autumn of 2024. As such the plan will only look ahead for 12 full years from the point at which it is adopted. The Council should therefore extend the plan period to 2039/40 to ensure that the plan

looks forward at least 15 years post adoption and should have a total housing requirement of 11,124 homes. As such the Council's housing requirement is not consistent with national policy and should be amended. As a consequence, consideration needs to be given prior to submitting this plan whether there is additional capacity on those sites allocated in the local plan to deliver more homes alongside further amendments to the Green Belt boundary to ensure needs are met in full.

17. In order to be consistent with paragraph 74 of the NPPF the local plan should include a housing trajectory illustrating the expected rate of housing delivery over the plan period. At present the trajectory is included in the supporting evidence base but not the local plan.

Overall housing supply

18. The Council outline in the justification to this policy that they anticipate the plan to deliver 9,439 homes over the plan period – 169 homes over the minimum requirement. As such there is no flexibility in overall supply should any of the sources identified in the table at paragraph 3.9 of the local plan does not come forward as expected. This is especially concerning given that a significant amount of supply is expected to come forward on brownfield sites that have historically delivered relatively slowly. According to the Council's report Planning for Housing Delivery, the average annual build-out rate between 2010/11 and 2018/19 was 8.52 units per annum<sup>3</sup>. Whilst this is an average encompassing a wide range of sites it does indicate that the Council should have considered a much larger buffer if it was to ensure needs are met in full.

Five-year land supply

19. A rolling assessment based on the trajectory in the local plan of the Council's five year housing land supply position across the plan period is set out in appendix 1. This shows that whilst there would be a five-year land supply on adoption in 2024 it is marginal and within three years of adoption the Council's land supply would fall below the five-year requirement and the plan would be considered out of date on the basis of paragraph 11 of the NPPF. This is a direct consequence of the Council seeking to meet needs but nothing more. No consideration has been given to the need to provide some flexibility in supply to ensure needs are met in full and that a plan does not become out of date soon after the plan is adopted. In order for the plan to be effective it is required to be deliverable over the plan period and on the basis of the Council's proposed trajectory this is not the case.

20. In addition, we have some concern regard to the larger allocations in the Green Belt sites that are due to be delivered between 2023 and 2027. Such sites must wait until the plan is adopted before they can achieve and planning consent and as such, we are concerned that sites such as SN1/006 will not come forward within that time frame if the plan is not adopted until mid-2024. Start to Finish by Lichfields indicates that the average planning approval period on sites of between 100 and 500 homes is 2.1 years, with on average a further 1.9 years being required to get from planning to first delivery. It can be expected that an allocated greenfield site should move through the planning and onto commencement more quickly than the average, but it can be reasonably expected that from application to first delivery will take at least three years. If SN1/006 is built out at circa 60 dpa, as suggested in paragraph 5.20 of the Council's report Planning for Housing Delivery, for average build out rates for sites in Spelthorne then the final year of delivery would be in 2028/29.

21. With regard to delivery rates between greenfield and brownfield sites in the same report the Council suggest that an uplift over brownfield delivery rates for green field sites in the borough of 34%. This is on the basis of Start to Finish which suggests that large scale greenfield sites deliver some 34%

faster than similar sized brownfield sites. However, the figure quoted appears to relate to large scale sites of 2,000 homes or more and as such we would question its relevance in Spelthorne where greenfield sites are much smaller and unlikely to exceed a delivery rate 60 dpa.

22. Similarly, the Council will need to justify the inclusion of outline permission on Renshaw Industrial Estate of 275 homes. The decision notice for this scheme is dated 27 July 2018 and as such has expired. Even if the Council can provide evidence as to its continued availability it is doubtful whether it is deliverable within five years. It is concerning that such a site has been included in the existing permission and we would suggest that the Council provides more detail as to the deliverability and developability of each site in the land supply pipeline for housing.

23. It is difficult to assess the impact of these two adjustments on overall supply without an annualised trajectory for each site that makes up the council's supply pipeline. Given that five-year land supply is marginal there is a risk that even minor adjustments will mean the plan not having a five-year land supply on adoption.

24. Therefore, in order to further assist the inspector examining the plan and other interested parties we would also suggest that the Council set out an annualised trajectory for each site. At present the Housing Trajectory Topic Paper sets out anticipated supply on each site in five-year tranches and provides no indication as to when the site is expected to commence or finish. Some sites may deliver across the tranches provided but without individual annualised trajectory it is not possible to tell which sites will deliver when and at what rate. Given that the Planning for Housing Delivery Report indicates that the Council has seemingly overestimated build out rates (Figure 3, page 80) it will also allow improved scrutiny as to how the findings of this report have been applied by the Council to the delivery trajectory in the submitted local plan and whether it is sound.

Exceptional circumstances

25. As the Council recognise Green Belt boundaries can only be amended in exceptional circumstances as part of the preparation or review of a local plan and only once it has made as much use as possible of brownfield sites, optimised densities and ensured no other authority can accommodate some of their need. SBC have shown that it is unable to meet its housing needs from within the urban area and that there are no other areas willing to meet some of their needs. Whilst there may be some opportunities to increase densities through more flexible policies, a point we return to later, such amendments would not on their own meet needs and as such the Council are justified in considering the amendments to Green Belt boundaries on the basis of paragraph 141 of the NPPF.

26. The Council set out the exceptional circumstances in the Topic Paper 1: Background to Strategy and case for exceptional circumstances to amend Green Belt boundaries. The key point raised by the Council is that just 0.7% of the Green Belt would be removed for development and that the benefits from redeveloping those sites being removed from the Green Belt outweigh any harm. However, the Council go on to state that the same position would be unlikely to support a much larger release of Green Belt or the release of more strategically important Green Belt sites. Whilst the HBF agrees that there are exceptional circumstances to support amendments to the boundary we do not consider these to stop at the point at which their own housing needs are met, especially given that this is based on a plan period that is inconsistent with national policy.

27. The issue of housing needs and affordability alone are sufficient to justify further amendments to the Green Belt boundary. The Council recognises that its proximity to London and its location close to Heathrow has a negative impact on affordability. These factors alongside low levels of housing

delivery in the last ten years have had an impact on affordability, with the median house prices some 12 times median work place-based incomes. These all indicate an area that is increasingly unaffordable for newly forming households in the Borough and that this is creating even more needs for affordable housing. In addition, the type of site that is expected to come forward on brownfield sites and through town centre regeneration will not deliver the family housing the Council consider to be important.

28. The evidence on affordable housing need is set out in the Strategic Housing Market Assessment and establishes that 459 affordable homes must be delivered each year to meet needs, roughly 74% of the annual housing requirement. However, on the basis of the spatial strategy and the affordable housing policy H2 it is inevitable that there will be a significant shortfall in meeting these needs across the plan period. The Planning for Housing report provides evidenced as to the scale of the problem in Table 29. This shows that on the basis of the 30% affordable housing requirement on PDL sites the Council would deliver 714 affordable homes over the next five years – over 1,500 short of what is required to meet needs. The only way for the Council to increase the supply of affordable housing is through the delivery of additional market housing, which in Spelthorne will require additional amendments to the Green Belt boundary given the limited availability of sites in the urban area.

29. The allocation of further sites would also ensure that the Council's land supply is in much healthier position. SBC are, correctly, acutely aware of the risk of not having a five-year housing land supply. However, in restricting itself to a strategy that only just meets needs the Council are not addressing that risk. There needs to be a much stronger pipeline of housing land to ensure that the inevitable delays in delivery will not impact on the five-year land supply.

30. Given the pressing need for affordable housing and the limited supply of available land in the urban the HBF consider there to be sufficient scope to justify further amendments to address either the unmet needs in neighbouring areas, providing a sufficient buffer in supply to maintain a five-year land supply or to ensure needs are met in full over an NPPF compliant plan period.

#### Conclusions

43. At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF. In particular we consider it necessary for the Council to identify further development sites in order to ensure that it can meet its own needs in full over an extended plan period that is consistent with national policy. As part of this process the Council will also need to revisit its Sustainability Appraisal and consider alternative strategies and sites that could deliver in excess of what is being proposed in this plan.

44. Finally, the Council will need to ensure prior to submitting the plan that it has sufficient evidence to support its assertion that it has met its duty to co-operate. At present the Council lacks the necessary statements of common ground that show how it has considered the strategic issues of unmet housing needs in neighbouring areas and without these the Council will find it difficult to show how the plan has been prepared in line with the relevant legislation. 45. I can also confirm that the HBF would like to attend participate in the public hearings in order to put forward the concerns of our members with regard to the Spelthorne Local Plan.

View attached document for full overall response.

**Question 6:** You can upload any modifications below.

HBF rep Spelthorne Reg 19 Sept 2022 2\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618697/PDF/-/HBF%20rep%20Spelthorne%20Reg%2019%20Sept%202022%202%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To represent the views of our membership

<b>Respondent: Mark Behrendt (19538401)</b>
<b>Organisation: Home Builders Federation</b>

<b>Response ID: 1120383</b>
<b>Policy / Evidence Base / Part of Plan: Policy PS1: Responding to the climate emergency</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not Justified, Not Effective, Not Consistent with National Policy - were all selected.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Parts of the policy are unsound as they repeat national policy. 31. Part 3b of the policy requires development to incorporate active electric vehicle charging points in accordance with local guidance. Given that standards for electric vehicle charging points are now included in part S of the Building Regulations it is not necessary for the Council to set out these standards in planning policy. Part 3b should be deleted. 32. Similarly, part 5 of the policy requires new homes to achieve a reduction on dwelling emission rates yet in June of this year the updated part L of the Building Regulations came into force which requires development to achieve a 27% reduction in emission rates compared to the Target Emission Rate in the 2013 regulations. Rather than have a multiplicity of standards the Government is seeking to address energy efficiency measures through Building Regulations and not the planning system. The Government recognised the need for some improvement sot be supported prior to these changes and as

such allowed for policies to seek energy efficiency improvement equivalent to the those achieved through level four of the code for sustainable homes (roughly a 20% improvement on the 2013 regulations). Now the latest building regulations are in place that achieve higher improvements with future regulations from 2025 expected to go well beyond current levels there is no need for planning policies on this issue. As such the Council should delete part 5 of this policy.

View attached document for full overall response.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To represent the views of our membership



<b>Respondent: Mark Behrendt (19538401)</b>
<b>Organisation: Home Builders Federation</b>

<b>Response ID: 1120384</b>
<b>Policy / Evidence Base / Part of Plan: Policy H1: Homes for All</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not justified, Not effective, Not consistent with national policy - were all selected.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Parts of the policy are unsound as they have either not been justified or repeat policy. 33. Part 1 of the policy repeats the minimum housing need set out in policy ST2. This is unnecessary and should be deleted from his policy H1. 34. Part 8(a) requires all new homes to be built to part M4(2) of the building Regulations. The Government have now confirmed in their response to the recent consultation on accessible homes that they will make Part M4(2) the mandatory standard. This is likely to come into force prior to the plan being adopted and as such we would recommend the requirement is deleted to avoid repetition with national policy. 35. Parts (b) seeks to encourage the provision of wheelchair adaptable housing in line with Part M4(3) and part (c) seek requires 10% of dwellings on major housing developments to be built to this same standard unless it is unviable. The Council must decide whether they are requiring provision or

seeking for this to be provided voluntarily. If it is the later then the Council must justify why this should be set at 10%. The Council's latest SHMA indicates that there is a growing number of people with long term health problem or disabilities but does not provide any evidence as to the number of households that are expected to require wheelchair adaptable home. If the Council are to require the 10% of all homes on major development are wheelchair adaptable it must, as set out in footnote 49 of the NPPF, provide the evidence justifying this policy.

36. Finally, part 14© of this policy states that where self-build plots have been made available and market for a 12-month period they will expect to remain on the open market as self-build or be offered to Council of Housing Association before being built out by the developer. Whilst the HBF agree that the policy needs to set out when unsold plots should return to the developer, we disagree with the approach being proposed. There is no reason to require a site to be retained on the open market following the 12-month period nor is there any justification for having to offer these to the Council or a housing association first. These are plots that would have been available for market housing and as such they should return to developer to be built out after the 12-month period. The Council should therefore amend the policy accordingly.

Conclusions

43. At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF. In particular we consider it necessary for the Council to identify further development sites in order to ensure that it can meet its own needs in full over an extended plan period that is consistent with national policy. As part of this process the Council will also need to revisit its Sustainability Appraisal and consider alternative strategies and sites that could deliver in excess of what is being proposed in this plan.

44. Finally, the Council will need to ensure prior to submitting the plan that it has sufficient evidence to support its assertion that it has met its duty to cooperate. At present the Council lacks the necessary statements of common ground that show how it has considered the strategic issues of unmet housing needs in neighbouring areas and without these the Council will find it difficult to show how the plan has been prepared in line with the relevant legislation. 45. I can also confirm that the HBF would like to attend participate in the public hearings in order to put forward the concerns of our members with regard to the Spelthorne Local Plan.

View attached document for full overall response.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To represent the views of our membership

<b>Respondent: Mark Behrendt (19538401)</b>
<b>Organisation: Home Builders Federation</b>

<b>Response ID: 1120385</b>
<b>Policy / Evidence Base / Part of Plan: Policy E2: Biodiversity</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not justified, Not effective, Not consistent with national policy - were all selected
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Part 5 is unsound as it repeats national policy. 37. Part 5 of the policy repeats the requirement set out in the Environment Act 2021 for new development to provide for at least a 10% net gain in biodiversity. However, as this is a requirement in legislation with a significant amount of supporting regulation and guidance, we would question whether it is necessary to repeat the requirement in this policy. As such we would suggest any reference to the legislative requirement is solely within the supporting text. Conclusions 43. At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF. In particular we consider it necessary for the Council to identify further development sites in order to ensure that it can meet its own needs in full over an extended plan

period that is consistent with national policy. As part of this process the Council will also need to revisit its Sustainability Appraisal and consider alternative strategies and sites that could deliver in excess of what is being proposed in this plan.

44. Finally, the Council will need to ensure prior to submitting the plan that it has sufficient evidence to support its assertion that it has met its duty to cooperate. At present the Council lacks the necessary statements of common ground that show how it has considered the strategic issues of unmet housing needs in neighbouring areas and without these the Council will find it difficult to show how the plan has been prepared in line with the relevant legislation. 45. I can also confirm that the HBF would like to attend participate in the public hearings in order to put forward the concerns of our members with regard to the Spelthorne Local Plan.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To represent the views of our membership

<b>Respondent: Mark Behrendt (19538401)</b>
<b>Organisation: Home Builders Federation</b>

<b>Response ID: 1120387</b>
<b>Policy / Evidence Base / Part of Plan: Policy ID2: Sustainable Transport for New Developments</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
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<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Policy in relation to parking standards is unsound as it is inconsistent with national policy and ineffective. 38. Part 2 of this policy requires developments to deliver parking at the levels set out in the latest supplementary planning document (SPD). Firstly, if the council should make it clear that new development should have regard to or take account of the relevant SPD as the Council can only set policy through the local plan. 39. Secondly, the Council state in paragraph 9.14 that they are seeking maximise use of sustainable and active forms of travel yet within this policy they are requiring all development to provide as a minimum 1 parking space per dwelling on affordable homes and 1.25 on market housing. This rigid approach to parking standards is counterproductive and will reinforce car use even those areas will served by public transport.

40. Rather than require development to meet these standards the Council should set out in policy that in locations well served by public transport a lower level of provision will be acceptable. The Council states in paragraph 9.16 of the supporting text that the policy does not preclude developers from bring forward car free development but given that these statements are made in the supporting text and makes no reference to wider flexibility and the circumstances when these may be applied it cannot be considered an effective in supporting new development that seeks to prioritise sustainable and active forms of travel.

41. The proposed flexibility to parking standards will also mean that development in more sustainable locations but where viability is challenging will be able to deliver at densities that make such sites deliverable without amending other policies. The Council's viability evidence notes at paragraph 3.2.4 and 3.2.5 that viability on PDL sites is more challenging especially those faced with high EUVs and potentially higher development costs – such as delivering underground or undercroft parking in order to meet parking standards. Therefore, in order to maximise delivery on sites with good access to public transport and encourage the use of sustainable travel options we would recommend the Council set out in policy where it considers it appropriate to deliver parking standards below those recommended in the Council's SPD.

42. The Council should also remove part 1(b). As we outlined in our comments on PS1 the standards for electric vehicle charging points are now included in part S of the Building Regulations. As such it is not necessary for the Council to set out these standards in planning policy.

#### Conclusions

43. At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF. In particular we consider it necessary for the Council to identify further development sites in order to ensure that it can meet its own needs in full over an extended plan period that is consistent with national policy. As part of this process the Council will also need to revisit its Sustainability Appraisal and consider alternative strategies and sites that could deliver in excess of what is being proposed in this plan.

44. Finally, the Council will need to ensure prior to submitting the plan that it has sufficient evidence to support its assertion that it has met its duty to cooperate. At present the Council lacks the necessary statements of common ground that show how it has considered the strategic issues of unmet housing needs in neighbouring areas and without these the Council will find it difficult to show how the plan has been prepared in line with the relevant legislation. 45. I can also confirm that the HBF would like to attend participate in the public hearings in order to put forward the concerns of our members with regard to the Spelthorne Local Plan.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To represent the views of our membership.



<b>Respondent: David Bell (25758433)</b>	
<b>Organisation:</b>	
<b>Response ID: 1124256</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>With reference to to the above (Green Belt)</p> <p>I do not want the Council to reduce the Green belt in Spelthorne’s new Local Plan.</p> <p>My view is the Council should not change the Green Belt boundaries but respect them.</p> <p>I would like to ask the Council not to make a pro-active case for releasing Green Belt in its draft Local Plan .</p> <p>Also not to declare that there are “exceptional circumstances” to justify Green Belt release. These circumstances have been invented to suit the policy.</p> <p>I absolutely disagree with the Council’s classification of certain Green belt areas as “weakly performing” as well as the criteria invented to justify such classification.</p>	

In my opinion all Green Belt sites perform one or more important function by merely existing, including checking the unrestricted sprawl of large built up areas, preventing neighbouring towns from merging into one another, assisting in safeguarding the countryside from encroachment, preserving the setting and special character of historic towns; and – extremely importantly - assisting in urban regeneration, by encouraging the recycling of derelict and other urban land (para.138 of the National Planning Policy Framework). All Green Belt is of considerable importance, is valued by residents and should remain protected.

I am extremely disappointed that the Council has also refused to designate 19 Green Belt areas (that were proposed by residents) as Local Green spaces and would like yourselves (the Council) to reverse this refusal.

**Question 6:** You can upload any modifications below.

No Response

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Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Graham Bell (40262177)</b>
<b>Organisation:</b>

<b>Response ID: 1112301</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy SP2: Ashford, Shepperton and Sunbury Cross
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
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No Response
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I see there are a lot of things happening to Staines in the future. I was wondering what was going to happen to the poor relation that is called Ashford? Is it being totally ignored as usual?
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
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Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Martyn Bevan (33960033)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122043</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Evidence base - IDP	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
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No Response	
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Assuming an average of 2 persons per home, 9270 new homes would mean a population increase of 18,000 plus in the borough, an increase of 18% over the period. The plan does not discuss any requirement to expand and improve utility infrastructure; sewerage, water supply, gas network expansion, electrical power transmission needs. Nor schools expansion. It only mentions working with partners, Surrey CC, Police and NHS. If the above are discussed in the Infrastructure Delivery Plan, it should be highlighted in the local plan. The IDP must consider the complete local plan timescale and not approach it piecemeal.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Martyn Bevan (33960033)</b>
<b>Organisation:</b>

<b>Response ID: 1122044</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
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Yes/No/Not answered: No Response   Additional Comments: No Response
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Spelthorne Borough Council have lamentably agreed with an imposed Government Requirement to build 9270 new homes over 15 years. To meet this ridiculous plan Staines Centre is identified as the best location to build the vast majority Assuming an average of 2 persons per home, 9270 new homes would mean a population increase of 18000 plus in the borough, an increase of 18% over the period. The plan does not discuss any requirement to expand and improve utility infrastructure; sewerage, water supply, gas network expansion, electrical power transmission needs. Nor schools expansion. It only mentions working with partners, Surrey CC, Police and NHS. If the above are discussed in the Infrastructure Delivery Plan, it should be highlighted in the local plan. The IDP must consider the complete local plan timescale and not approach it piecemeal.

This is a disastrous decision in my opinion in a borough of 43100 dwellings (a 2021 estimate) It is an expansion of 21.5% and the only way of accommodating such a massive increase in a borough which is just 35% urban is vertical concentration.

Almost all the new homes projected to be built in Staines centre appear to be apartments or flats. Service costs make apartments and flats expensive to live in compounded if leasehold as need to budget for maintenance and upkeep and if freehold, active management is required by freeholders to ensure proper maintenance and upkeep and to ensure costs are shared among ALL occupiers and or owners. Rental then might be preferred. Private rental often means high turnover of occupiers who as such would naturally have little investment in the community.

People with families aspire to ownership of a house with garden. The post Covid changes now allows home working for many and to better choose where they want to live enabling the trend to move away from large crowded conurbations ie, the Staines of the future. Why live in an expensive apartment in an inner city environment when families can benefit from a quieter, more affordable, traditional environment further afield.

There should be limits on the heights of buildings to maintain the character of the town, it's environment and the townscape for the benefit of ALL residents. Haven't residents already made clear their objections to high rise towers? Eight storeys should be the maximum throughout. In Staines centre, excluding what is already under construction, the plan anticipates: In years 1 to 5; 750 C3 residential units, years 6 to 10; 1380, years 11 to 15; 1373

For the reasons set out above I do not believe this is a sustainable plan. It is an expansion of huge proportions that will fundamentally change the character of Staines centre for the worse. The government's imposed requirement needs to be scaled right back.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Nicola Bevens (41993441)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117271</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
I would like to write to you regarding the local green space around queens walk in ashford. As a household with a small baby under 1, we use the green spaces every day here, ensuring the baby gets fresh air, walking for our mental health and exercise, ensuring we get sufficient day light, having his first park visit on the swings, walking our parents dogs and general play area in the childrens park. We also attend group gatherings such as the Jubilee party, allowing neighbours to join together as a community. The green space behind queens walk was one of the reasons that we bought this house and talking to the neighbours, many of us feel the same. Please take these views into consideration when reviewing the local green spaces.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Black Rock Real Assets (43052001)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128020</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Not justified, Not effective, Not consistent with national policy - were also all selected.	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>Policy ST2 (Planning for the Borough)</p> <p>Policy ST2 (Planning for the Borough) sets out the spatial planning approach of development within the Borough. In respect of employment land, point 2 of the policy sets out that:</p> <p>"2. Economic growth in Spelthorne will be supported by maintaining and intensifying the use of the Borough's employment floorspace offer. This will be done by;</p> <ul style="list-style-type: none"> <li>• safeguarding employment land,</li> <li>• provision of new land in line with needs identified through the most up to date evidence and</li> <li>• encouraging its innovative re-use in ways that better meet the needs of the market."</li> </ul>	

We welcome the encouragement of innovative re-use of employment floorspace within the borough, which provides a suitable level of flexibility within the Local Plan with regard to replacing employment uses with other non-employment ones, including residential development.

However, it is considered that this conflicts with the first part of point 2 within the policy which seeks to safeguard employment land. The suggestion here being that an alternative use of existing employment land would not be accepted. We would strongly suggest that this wording is tightened and specifically focuses upon the designated employment areas with the Borough.

Paragraph 123 of the Framework sets out that:

“Local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular, they should support proposals to:

a) use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres, and would be compatible with other policies in this Framework;....”.

We would also note that 65% of Spelthorne Borough is designated as Green Belt. This places increased focus and demand on its brownfield land. Through the emerging Local Plan, the Council are having to release Green Belt land sufficient to deliver 829 new homes. The constrained land supply position makes it imperative that flexibility is built in to the Local Plan to ensure that change of circumstances can be captured within the +15year plan period.

We would ask that a clear distinction is made between the Strategic Employment Areas and undesignated employment areas, this will ensure that policy is sound and in line with the thrust of the Framework. It will also allow the market outside of defined employment areas to adjust to changing condition, whilst also ensuring that further potential windfall supply of residential uses can be delivered.

We would request the following modification to Policy ST2 (as outlined in red (designated)):

“2. Economic growth in Spelthorne will be supported by maintaining and intensifying the use of the Borough’s employment floorspace offer. This will be done by;

- safeguarding designated employment land,
- provision of new land in line with needs identified through the most up to date evidence and
- encouraging its innovative re-use in ways that better meet the needs of the market.”

Please refer to attached document for further in depth rep.

**Question 6:** You can upload any modifications below.

Compass Point - Regulation 19 - Consultation\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618817/PDF/-/Compass%20Point%20%2D%20Regulation%2019%20%2D%20Consultation%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: We believe we can assist the Inspector in recommending modifications to make the plan sound.

<b>Respondent: Black Rock Real Assets (43052001)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128021</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy EC1: Meeting Employment Needs	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Not justified, Not effective, Not consistent with national policy - were also all selected	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>Policy EC1 (Meeting Employment Needs) of the emerging Local Plan outlines how employment need will be met within the Borough. Point 1 of this policy reiterates Point 2 of Policy ST2, and for the reasons outlined above we would request that this section of Policy EC1 is also modified. In addition to this, points 8 and 9 of EC1 identify that:</p> <p>“8. Outside of the designated employment sites, employment floorspace will be protected in line with the latest Employment Land Needs Assessment and the loss will be resisted unless the site is having significant negative impact on residential amenity.</p> <p>9. Redevelopment or change of use to a non-employment use will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use for a continuous period of at least 24 months prior to submission of a planning application. If the site is allocated for an alternative use within the Local Plan, the marketing period will not be required.”</p>	

In addition, we consider the tone of the policy restrictive. It is not positive planning as called for by the Framework.

The Employment Land Needs Assessment (ELNA) 2022 forecasts that over the plan period just over 18,000sq m of E(g) (i) and E(g)(ii) Office and Research & Development will be required in order to meet the anticipated level of jobs which will be created. Reference to potential employment areas is discussed in section 3 of the report and designation as a strategic employment site is given to 4 locations.

This document does not make specific reference as to where additional floorspace will be provided or how much floorspace is needed within identified locations. It is distinctively lacking any spatial planning component, which would help direct employment growth within the Borough and outline where it should be focused. In addition, the document does not specifically identify a certain amount of vacant floorspace and how the future occupation of this may contribute to meeting additional floorspace required.

In addition, the Employment Land Needs Assessment is a snapshot in time and therefore could quite easily be out of date soon after it is published. This is acknowledged within the report within the Executive Summary where it states:

“It is currently even more difficult, particularly for office floorspaces, as the medium- and longerterm impacts of the “post-covid return to work” and hybrid remain unclear.”

As a result, it is not exactly clear how this document can be used to when assessing proposals against Point 8 of Policy EC1. We would strongly suggest that reference to the Employment Land Needs Assessment is removed.

Furthermore, there is no definition as to what significant negative impact on residential comprises. We would argue that this relates to both visual amenity in terms of townscape and surrounding context, i.e. Compass Point is surrounded by residential development and its conversion to such a use would be more in-keeping with its surrounding environs.

Similarly, under point 9 of Policy EC1 the need for active and comprehensive marketing of the site for a continuous period of 24 months is considered onerous. There is no evidence presented as to why 24 months is an appropriate time period. The justification text to the Local Plan simply sets out at paragraph 8.5 that:

“Active and comprehensive marketing requires demonstration of a marketing campaign for a continuous period of at least 24 months. Marketing must be undertaken through a recognised commercial agent at a price that genuinely reflects the market value of the current or most recent use of the site. It must be demonstrated to the Council’s satisfaction that marketing has been unsuccessful for all relevant floor space proposed to be lost through re-development or change of use”

In the absence of this evidence we challenge the validity of the time period. As set out by the Framework at paragraph 82 planning policies should:

“d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.” [our emphasis]

24 months of marketing cannot be said to comprise a rapid response.

It is considered that it would be clear after 12 months that there is no substantive demand for office floorspace, and rather than a site remaining vacant for an excessively long time of 24 months, the site could be re-use to a purpose that suits the current economy and more pressing needs of the area identified at that time.

In order for the local plan to build in additional flexibility for undesignated employment sites we would suggest the following modifications to Point 8 and 9 of Policy EC1:

“8. Outside of the designated employment sites, the change of use or redevelopment of sites will be supported where it can be demonstrated that the existing use has a negative impact on existing residential amenity employment floorspace will be protected in line with the latest Employment Land Needs Assessment and the loss will be resisted unless the site is having significant negative impact on residential amenity.

9. Redevelopment or change of use to a non-employment use will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use for a continuous period of at least 24 12 months prior to the determination submission of a planning application. If the site is allocated for an alternative use within the Local Plan, the marketing period will not be required.”

Please refer to attached document for clarity of suggested modification and further in depth reps.

**Question 6:** You can upload any modifications below.

Compass Point - Regulation 19 - Consultation\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618818/PDF/-/Compass%20Point%20%2D%20Regulation%2019%20%2D%20Consultation%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: We believe we can assist the Inspector in recommending modifications to make the plan sound.



<b>Respondent: Mr John Blake (39699649)</b>
<b>Organisation:</b>

<b>Response ID: 1123630</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
From what I have read of the local plan there appears to be a disproportionate focus on building high density small accommodation without clear focus on family homes. The local plan says that utilising green belt swill allow for family homes but the green belt allocation is far smaller than the land set aside for small apartments within high rise buildings.
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
---

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr John Blake (39699649)</b>
<b>Organisation:</b>

<b>Response ID: 1112353</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I am concerned that there is insufficient focus on allocating green spaces for leisure and young children - families need sufficient green space and entertainment to thrive.
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr John Blake (39699649)</b>
<b>Organisation:</b>

<b>Response ID: 1112354</b>
<b>Policy / Evidence Base / Part of Plan: Policy ID1: Infrastructure and Delivery</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
And, finally, where are all the kids going to go to school and how will families have access to much needed health care and transport?
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No Response
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Patrick Blake (41823137)</b>	
<b>Organisation:</b> National Highways	
<b>Response ID:</b> 1114447	
<b>Policy / Evidence Base / Part of Plan:</b> Plan as a whole	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>National Highways (“we”) has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such National Highways work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. National Highways will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN.</p> <p>In the case of the Pre-submission Spelthorne Local Plan and Staines Development Framework, National Highways is primarily interested in the impacts of the development plan on the M25 (more particularly, M25 Junctions 12 to 14), the M3 (more particularly, Junctions 1 and 2) and the A30.</p> <p>Having reviewed the materials available via Spelthorne Borough Council’s consultation page, we offer the following comments:</p>	

Pre-submission Spelthorne Local Plan (June 2022)

National Highways welcomes a Local Plan that:

- expects development proposals located within or adjacent to town/local centres or a public transport interchange to optimise the density of development in order to make the most efficient use of the land in the most sustainable locations (see Section 3: Strategy and Strategic Policies, ST2: Planning for the Borough, page 17);
- directs development towards locations that minimise the need to travel and maximise the ability to make trips by sustainable modes of transport including cycling, walking and public transport and provides more walkable and cyclable neighbourhoods to reduce demand for the use of private vehicles (Section 4: Place Shaping, PS1: Responding to the climate emergency, pages 24 & 25);
- ensures that all new development is designed to meet the needs of all users and is accessible to all, including necessary transport infrastructure (Section 4: Place Shaping, PS2: Designing places and spaces, pages 28 & 29);
- recognises that growth of Staines-upon-Thames will be dependent on enhanced infrastructure, particularly to capitalise on the proximity to Heathrow Airport, and therefore supports proposals that facilitate new and improved public and sustainable transport links (Section 5: Spatial Policies, SP1: Staines-upon-Thames, pages 37 & 38);
- considers Southern Rail Access to Heathrow, including a station at Staines and Southern Light Rail, essential for the town to maximise access to the airport regardless of any expansion proposals (Section 5: Spatial Policies, SP1: Staines-upon-Thames, pages 37 & 38);
- exploits the development opportunities in Ashford, Shepperton and Sunbury Cross around public transport interchanges, while expecting new developments to provide infrastructure improvements necessary to mitigate impacts (Section 5: Spatial Policies, SP2: Ashford, Shepperton and Sunbury Cross, pages 41 & 42);
- supports proposals that seek to improve infrastructure to support the anticipated level of development in the centres in Ashford, Shepperton and Sunbury Cross, including public transport and sustainable and active travel opportunities (Section 5: Spatial Policies, SP2: Ashford, Shepperton and Sunbury Cross, pages 41 & 42);
- seeks to identify long term sources of funding and secure proposals for new infrastructure which offer sustainable transport links, including active travel and public transport, to improve access into and out of Heathrow Airport and other employment areas (Section 5: Spatial Policies, SP3: Stanwell and Stanwell Moor, pages 44 & 45);
- recognises that the delivery of development may need to be phased to reflect the delivery of infrastructure (Section 9: Infrastructure and Delivery, ID1: Infrastructure and Delivery, pages 122 & 123), such that there may be occasions where infrastructure capacity improvements are required or critical to development (Section 9: Infrastructure and Delivery, paragraph 9.6, page 124); and
- requires development proposals to incorporate opportunities to facilitate sustainable and active modes of travel and seeks to promote and enable schemes and development proposals which facilitate sustainable and active travel (Section 9: Infrastructure and Delivery, ID2: Sustainable Transport for New Developments, pages 126 & 127).



In addition to the above, National Highways:

- expects 'material considerations' to include development-related impacts that have the potential to affect the safe and efficient operation of the SRN (Section 3: Strategy and Strategic Policies, ST1: Presumption in Favour of Sustainable Development, page 17).

National Highways has reviewed the Local Plan individual allocations set out in full in Section 10 of the pre-submission Local Plan document. It is noted that Site ID [AS2/006], Land East of Desford Way, seeks to allocate an area of 3.33ha adjacent to the A30 for up to 15 travelling show-people plots.

Although not stated, it is anticipated that access to the site may be gained directly from the A30. To date, no evidence has been provided that demonstrates that the principle of access to the SRN can be delivered at this location. Safe and suitable access to the trunk road network must be ensured for all users, and a clear and defined strategy for gaining access, coinciding with full technical and engineering appraisal, would need to be firmly established through the submission of any future planning application.

Whilst we understand that the access proposals are still emerging however where relevant to the SRN, it must be demonstrated that the access proposals comply in all respects with the Design Standards for Roads and Bridges (DMRB) and can be delivered while maintaining the safe and efficient operation of the A30.

Staines-upon-Thames Town Centre Draft Development Framework (April 2022)

National Highways notes Spelthorne's ambitions for Staines-upon-Thames Town Centre – more particularly, to reduce the scale of the transport infrastructure ringing the town centre to reduce severance and create an improved pedestrian experience and, in addition, to create entrances and gateways to the town centre that reflect the quality and attractiveness of the core town centre and make walking and cycling journeys pleasant and enjoyable (Built form, public realm & open space, paragraph 2.35, page 24). Without discounting the local benefits associated with such ambitions, nor the desire for more sustainable travel to, from and through the town centre, reduced highway capacity within the town centre could easily displace east-west (B308/B376 to west and B308/A30 to east) and north-south (B376 to north and south) traffic to the A30. National Highways will be concerned about the safe and efficient operation of the A30. Accordingly, National Highways looks forward to being consulted on and involved with the development and, more particularly, the modelling of schemes for Staines-upon-Thames Town Centre.

Infrastructure Delivery Plan 2022-2037, Spelthorne Borough Council (June 2022, draft version for consultation)

Apart from the opportunities that exist to improve Sunbury Cross Roundabout (i.e. improvements to signals with provision for cyclist and pedestrian surface crossing and public realm works), all of the potential opportunities to improve connectivity within Spelthorne (Table 10) are largely local in nature and are not expected to impact the SRN. Traffic operations at Sunbury Cross Roundabout have direct implications for the safe and efficient operation of the M3. As stated again below in the comments concerning the Strategic Highway Assessment Report, National Highways expects to be consulted as schemes for Sunbury Cross Roundabout are developed and tested. National Highways expects such schemes to be planned, designed and delivered in ways that protect safe and efficient operations on the M3.

Strategic Highway Assessment Report (April 2022) & Strategic Highway Assessment Report: Technical Annex (June 2022)

The supporting Strategic Highway Assessment Report (SHAR) sets out the impacts of the Pre-Submission Local Plan on both the Local Road Network (LRN) and the SRN using SCC's SINTRAM72 model and an associated cordoned Local Model. It should be noted that the technical review by National Highways of the SHAR does not relate to the soundness of the plan as there are no identified showstoppers at this stage. However it does highlight the need for further assessment to inform possible updates to the Infrastructure Delivery Plan supporting the Local Plan.

In addition to a Base Year of 2014, the two following forecast modelling scenarios are presented and reported within the TA:

- 2037 Do Minimum (DM): includes growth outside the district plus growth from planned and committed developments from 2014 within the district
- 2037 Do Something (DS): 2037 DM plus Local Plan development sites and windfalls

A Technical Annex to the SHAR provides more detail concerning the forecasting of growth within and outside the district and the inclusion of a number of large-scale developments located outside of but close to Spelthorne which are either already permitted or included in Local Plans (i.e. Longcross Garden Village Southern and Northern Sites, South Bedfont, Bedfont Gardens, Airport Business Park and MOD Feltham).

National Highways received satisfactory answers to its initial queries (emailed to SCC/SBC on 31 May 2022 and responded to by SCC via a presentation on 14 June and emails on 15 June and 5 July). National Highways' queries concerned:

- unexpectedly modest increases in 2037 AM and PM peak hour vehicle trips compared to the Local Plan residential and commercial development changes;

- unexpectedly localised trip length distributions;

- high merge delays on the M25 Junction 13 northbound on-slip, the M25 Junction 13 southbound on-slip and the M25 Junction 14 southbound on-slip (in both the 2037 DM and DS); and

- a need for improved motorway merge/diverge layouts at the M3 Junction 1 eastbound merge, the M3 Junction 1 eastbound diverge and the M25 anticlockwise Junction 13 merge, which

- \* SCC states may be required in both the 2037 DM and DS scenarios (i.e. the additional trips generated by the Local Plan development sites do not create an additional problem; the existing sub-standard layout combined with background growth necessitates the need for improvements); and

- \* (concerning which) SCC advises caution with given merge and diverge layouts can offer more capacity than worse case flows suggest (i.e. further assessment may be required).

However, National Highways requested (5 July 2022) but still awaits detailed model outputs from SCC for the roundabouts at M25 Junctions 13 and 14, Sunbury Cross Roundabout and the A30/A308 junction. Subject to the review of these detailed model outputs and their implications for the safe and efficient operation of the SRN, residual cumulative impacts from the Local Plan appear to have been adequately identified and the modelled effect of the draft spatial strategy on the SRN appears reasonable. Although the impacts of the Local Plan on the SRN appear relatively modest, National Highways notes that the M25 Junction 13 to Junction 14 mainline, M25 Junction 14 to Junction 13 mainline and M25 Junction 13 to Junction 12 mainline are close to operational capacity in both the 2037 DM and DS (see Tables 5-1 and 5-2, Figures 5-1 and 5-4 and Tables 6-1 to 6-6). Further, and as already noted

above, merge delays on the M25 Junction 13 northbound on-slip, M25 Junction 13 southbound on-slip and M25 Junction 14 southbound on-slip are relatively high in both the 2037 DM and DS (see Tables 5-3 and 5-4).

Sunbury Cross Roundabout is part of the LRN but has implications for the SRN – more particularly, the M3 Junction 1 off-slips and on-slips. It is noted in paragraph 8.2.4 – ‘Sunbury Cross currently is a congested junction, yet flows on the circulatory carriageway are forecast to increase in both the AM and PM peaks, as shown in Figure 5-2. The increases are forecast to be similar in both peaks with the average increase being 51 PCU and 48 PCU in the AM and PM peaks respectively: it is unlikely these increases could be accommodated easily at this already congested location.’ Accordingly, mitigation may be required at Sunbury Cross Roundabout (see paragraphs 8.3.1 to 8.3.3 and Tables 8-1 and 8-2). National Highways expects to be consulted as schemes for Sunbury Cross Roundabout are developed and tested. National Highways expects such schemes to be planned, designed and delivered in ways that protect safe and efficient operations on the M3.

National Highways notes ‘a need for localised highway mitigation tied in with specific developments, as well as schemes to address cumulative impacts in some locations’ and ‘a need for high quality pedestrian and cycle routes and corridors linking the developments with where people want to travel to in order to limit travel by private vehicle’. Concerning the former, ‘[s]ome further work will be required to help inform Spelthorne’s Infrastructure Development Plan’ (see paragraph 9.1.3, SHAR).

National Highways also notes the reference to Surrey’s emerging Local Transport Plan and the opportunities that exist to reduce the number and length of trips through improved land use and travel planning to reduce carbon emissions and support increased use of sustainable forms of travel for local journeys via a new travel hierarchy which prioritises sustainable modes (see paragraphs 9.1.5 and 9.1.6, SHAR). National Highways welcomes such efforts, but would be concerned if the vehicular trip-making (rates and distributions) underpinning assumed mode shifts isn’t realised. Monitoring of trip-making patterns and changes over time is therefore essential.

Nevertheless, National Highways notes that no allowance has been made in the traffic modelling for Local Plan -related residents and employees who might travel by public transport or active forms of travel except by way of the vehicular trip rates assumed. Further, no strategic bus and rail services improvements are proposed as part of the draft Local Plan spatial strategy, although active support for a Southern Rail Link to Heathrow is expressed. Importantly, the use of fixed forecast demands yields worst case results (paragraph 7.8.2, SHAR Annex).

We trust the above is useful and will be pleased to discuss it with you.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr David Bonner (25523073)</b>
<b>Organisation:</b>

<b>Response ID: 1112342</b>
<b>Policy / Evidence Base / Part of Plan: Policy ID1: Infrastructure and Delivery</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Dear Spelthorne council, i attended a council meeting reference the the local plan a few years ago. I asked as question about infrastructure, Doctors, parking, etc etc, the reply from the chair was that it will be taken into account within the plan. Well here we are, Brooklands collage land now built on and more accommodation still being built. The car park is to be turned into more accommodation and plans for more accommodation next to the new accommodation just built by where the old White House use to be. No argument we need more homes and you are under government Instruction to build more. Here's the however, where are the additional doctors surgeries, Studholme was refused permission to extend and guess what over the last weeks Studholme has stopped taking appointments because it is at capacity.

where are the additional nursery places, where are the additional school places, Where are we all going to park when we go shopping, Where is your detailed infrastructure plan.  
You can moan about government forcing your hand to build but I am sure they do we expect you to support and manage the borough you were elected to look after.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Hardeep and Tomasz Borys (42100577)</b>	
<b>Organisation:</b>	
<b>Response ID: 1119438</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
LGS: Ashford Town: The Wickets We are writing this email re. protecting the park on The Wickets as a Local Green Space. We use this park with our 2 year old. It's away from any busy roads so safer and is more suited to young children. The Wickets is a family road so there are many young children who use this park without older children and teenagers using the playground. The park was also recently used for the Jubilee party which really brought the community together. There are not many roads which have these parks on the road to bring together families. It was be a great asset to protect this park as a local green space.	
<b>Question 6:</b> You can upload any modifications below.	

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: John Boughtflower (19531553)</b>
<b>Organisation: Spelthorne BC Councillor</b>

<b>Response ID: 1124618</b>
<b>Policy / Evidence Base / Part of Plan: Policy PS1: Responding to the climate emergency</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
I am writing to support Spelthorne Councils position that Green Belt along Ashford's Border should not be released for development. A major part of the Green Belt function is the separating the communities This is exactly what the Green Belt on our border does. It separates not just the communities of Ashford and Feltham, but beyond those two regions (London from the South East). As such it strongly performs this prime function of Green Belt . Outside its border areas Ashford has little of the fragmented Green Belt that characterises much of the rest of Spelthorne. Ashford is a dense urban community and most fragments Green Belt went long ago. Unfortunately, a few more of the fragments it have left have are now recommended for release. I deeply regret this as I regret the loss of any Green Belt but I understand that sacrificing a few small fragments enables us to far better defend the vast majority of our Green Belt both in Ashford or more widely in Spelthorne.

Protecting Green Belt, is partly to encourage better use of Brown field sites. This Spelthorne is doing, and these brownfield sites along without small release of Green Belt has enabled us to meet our housing target. As such I would strongly oppose the release of any other Green Belt sites either in Ashford or beyond.

I would also like to take the opportunity to thank you for all your hard work on the local plan, dealing with the amazing amount of submission in feedback to the excellent consultation this is appreciated by the residents of Spelthorne.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: John Boughtflower (19531553)</b>
<b>Organisation: Spelthorne BC Councillor</b>

<b>Response ID: 1117439</b>
<b>Policy / Evidence Base / Part of Plan: Policy E5: Open Space and Recreation</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Submissions attached for: <ul style="list-style-type: none"> <li>• Convent Road</li> <li>• Muncaster Close</li> <li>• Chatten Road</li> <li>• Clockhouse Lane</li> <li>• Clockhouse Roundabout</li> <li>• Feltham Hill Road</li> <li>• Fernhurst Road</li> </ul>

Please find the attached detailed submissions for Local Green Spaces, each submission contains location map, photo, reason and contact details. These locations are critical to be protected, and are highly valued by local residents. I would also like to take the opportunity to thank you for all your hard work on the local plan, this is appreciated by the residents of Spelthorne.

**Question 6:** You can upload any modifications below.

LDF Convent Road AshE 2209x\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619773/PDF/-/LDF%20Convent%20Road%20AshE%202209x%5FRedacted%2Epdf>

LGS AshE Clockhouse Lane 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619774/PDF/-/LGS%20AshE%20Clockhouse%20Lane%202209p%5FRedacted%2Epdf>

LGS AshE Fernhurst Road 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619775/PDF/-/LGS%20AshE%20Fernhurst%20Road%202209p%5FRedacted%2Epdf>

LGS AshE Clockhouse Roundabout 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619776/PDF/-/LGS%20AshE%20Clockhouse%20Roundabout%202209p%5FRedacted%2Epdf>

LGS AshE Muncaster Close 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619777/PDF/-/LGS%20AshE%20Muncaster%20Close%202209p%5FRedacted%2Epdf>

LGS AshE Chatten Rd 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619778/PDF/-/LGS%20AshE%20Chatten%20Rd%202209p%5FRedacted%2Epdf>

LDF Manor Road AshE 2209x\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619779/PDF/-/LDF%20Manor%20Road%20AshE%202209x%5FRedacted%2Epdf>

LGS AshE Feltham Hill Road 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619780/PDF/-/LGS%20AshE%20Feltham%20Hill%20Road%202209p%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: MR PETER BOWER (19811777)</b>
<b>Organisation:</b>

<b>Response ID: 1111795</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS2: Designing places and spaces
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
No Response
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: MR PETER BOWER (19811777)</b>
<b>Organisation:</b>

<b>Response ID: 1111796</b>
<b>Policy / Evidence Base / Part of Plan: Policy SP1: Staines-upon-Thames</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No Response
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response





<b>Respondent: MR PETER BOWER (19811777)</b>
<b>Organisation:</b>

<b>Response ID: 1111797</b>
<b>Policy / Evidence Base / Part of Plan: ST4/002 (Bridge Street Car Park, Hanover House &amp; Sea Cadet Building, Bridge Street, Staines)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No Response
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: MR PETER BOWER (19811777)</b>
<b>Organisation:</b>

<b>Response ID: 1111529</b>
<b>Policy / Evidence Base / Part of Plan: RL1/011 (Land at Staines and Laleham Sports Club, Worple Road)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No Response
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Cllr Amar Brar (23244737)</b>
<b>Organisation: Spelthorne BC Councillor</b>

<b>Response ID: 1117448</b>
<b>Policy / Evidence Base / Part of Plan: Policy E5: Open Space and Recreation</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Please find the attached detailed submissions for Local Green Space, the submission contains location map, photo, reason and contact details. These locations are critical to be protected, and is highly valued by local residents. I would also like to take the opportunity to thank you for all your hard work on the local plan, this is appreciated by the residents of Spelthorne.
<b>Question 6: You can upload any modifications below.</b>
Brar + Buttar - LGS Hengrove Crescent ANS 2209p_Redacted.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619539/PDF/-/Brar%20%5F%20Buttar%20%2D%20LGS%20Hengrove%20Crescent%20ANS%202209p%5FRedacted%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619539/PDF/-/Brar%20%5F%20Buttar%20%2D%20LGS%20Hengrove%20Crescent%20ANS%202209p%5FRedacted%2Epdf</a>

Brar + Buttar - LGS Kenilworth Road ANS 2209p\_Redacted.pdf  
<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619540/PDF/-/Brar%20%5F%20Buttar%20%2D%20LGS%20Kenilworth%20Road%20ANS%202209p%5FRedacted%2Epdf>

Brar + Buttar - LGS Clare Road ANS 2209p\_Redacted.pdf  
<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619541/PDF/-/Brar%20%5F%20Buttar%20%2D%20LGS%20Clare%20Road%20ANS%202209p%5FRedacted%2Epdf>

Brar + Buttar - LGS Scotts Close ANS 2209p\_Redacted.pdf  
<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619542/PDF/-/Brar%20%5F%20Buttar%20%2D%20LGS%20Scotts%20Close%20ANS%202209p%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Susan Briant (42050945)</b>	
<b>Organisation:</b>	
<b>Response ID: 1124627</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>I object to the proposed release of Green Belt land in Spelthorne and call on the council to respect existing Green Belt boundaries. All Green Belt is of considerable importance offering the opportunity to enhance green infrastructure, to increase biodiversity, improve air quality and manage surface water run-off and is valued by residents. Paragraph 81 NPPF states that ‘Local planning authorities are required to plan positively to enhance the beneficial use of the Green Belt’ and I would encourage Spelthorne Borough Council to embrace this policy for the benefit of its residents (see below). Spelthorne Local Plan Green Belt Assessment</p> <p>I strongly object to Spelthorne Borough Council’s proposal to release Green Belt land as outlined in the Pre-submission Spelthorne Local Plan (Reg 19 Consultation). The assessment of the sites in question was undertaken by ARUP in 2017/2018, some 4 years ago and there have been significant changes</p>	



in government policy and thinking since that date. In particular, the pandemic has illustrated the importance of green space, no matter how small and its benefits to mental health, and that it should be valued and enhanced wherever possible.

Protection of Green Belt around urban areas is a core planning principle of the NPPF. The NPPF advocates openness and permanence as essential characteristics of the Green Belt and advocates enhancement to existing Green Belts. Paragraph 81 states that 'Local planning authorities are required to plan positively to enhance the beneficial use of the Green Belt', including looking for opportunities to:

- 'Provide access;
- Provide opportunities for outdoor sport and recreation;
- Retain and enhance landscapes, visual amenity and biodiversity; or
- Improve damaged and derelict land'.

Paragraph 83 states that Green Belt boundaries 'should only be altered in exceptional circumstances'.

It seems that ARUP's report was commissioned with a view to identifying areas of Green Belt that could be released for housing development. If correct this is totally contrary to national guidance.

If, for example one looks at AS1/011, Land at former Bulldog Nurseries, this has been assessed by ARUP as 'weakly performing and less important' but it is a corner plot, offering the 'opportunity for planting mature trees' which will 'visually enhance the wider area' and offer comfort to those in the community. To develop this area would destroy the openness enjoyed by the Green Belt and there are no exceptional circumstances to justify altering the boundary.

Similarly site reference AT1/002 Land east of Ashford Sports Club, Woodthorpe Road, Ashford, a 1.15 ha plot is assessed as 'weakly performing/less important' but again this site offers opportunity for enhancement and improvements to biodiversity, including 'opportunities to create walking and cycling routes connecting the wider community to the publicly accessible green space to the south west of the parcel'.

Opportunity for enhancement also applies to HS1/002 Land at Croysdale Avenue, Sunbury, HS2/004, Land south of Nursery Road, Sunbury on Thames, LS1/024 Land at Staines Road West and Cedar Way, RL1/011 Land at Staines and Laleham Sport Club, SN1/006 Land to the west of Long Lane and south of Blackburn Trading Estate etc. All these parcels offer 'opportunity for enhanced green infrastructure to increase biodiversity, improve air quality and effectively manage surface water run-off through the incorporation of SUDS'. The planting of mature trees would visually enhance these areas.

I would urge Spelthorne Borough Council to follow the principle of the NPPF and enhance the beneficial use of the Green Belt in Spelthorne.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Winston Brooks (25444993)</b>
<b>Organisation:</b>

<b>Response ID: 1111791</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
LGS: Sunbury Common: Heatherlands respect to our local green space, namely at Heatherlands. This is the focal point of the Heatherlands community and used by residents to exercise, to walk on and around. Gather and socialize on by both adults and children. The children also enjoy playing on it, in a safe environment which is overlooked by all of the Heatherlands properties. We wish it to remain as is.
<b>Question 6:</b> You can upload any modifications below.
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Clarisse Broughton (41803105)</b>	
<b>Organisation:</b>	
<b>Response ID: 1125640</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
<p>We feel very strongly, and for good reasons, the ludicrous idea to have yet more dwellings imposed on our Borough by the Government - 618! This is incomprehensible as this is an area already over saturated where the infrastructure cannot cope. A good example is the Sunbury Health Centre which has in excess of 20,000 patients which will be further compromised by additional dwellings.</p> <p>It looks like the only aim of the Government is to build houses to show that they're doing something, but we wish someone would remind them that the population needs more than dwellings. Don't think we need to go through the list, or maybe we should!</p> <p>Please pass our comments to the appropriate Department. Thank you.</p>	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Miss Jeanette Brown (42037697)</b>
<b>Organisation:</b>

<b>Response ID: 1118065</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I have lived in Dane Rd for 35 years & in Napier Rd for 30 years. I grew up at Dane Rd, my late parents moved here in 1958 when i was 4 months old. I moved back in 2019 after they both passed away the previous year. I used to play in this copse, to my knowledge its always been a part of Dane Rd & is a famous landmark, like the little park at midway point, used to be k/as 'the wreck'. There are several 'local green spaces' dotted around this estate & farther afield off Goffs Rd & at Woodlands Parade. All have their own history & qualities. My friends in Dane Rd & i used to have picnics inside the copse, like a hidey-hole & think we couldn't be seen when it was time for tea. Its a thriving green area, completely natural. Its always been a similar size & i saw a gentleman trimming the grass around the kerb just this morning. This space is also used by dog walkers, they stop & chat, have done for years, people jog round it & I've seen school kids wait there in the mornings for their rides, on my way to work. I'm not sure Dane Rd or indeed any of these areas

would ever be the same without their respective little patch of green space. My father used to read to me from The Domesday Book, there's so much fascinating history inside about Spelthorne.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Cheryl Brunton (41751713)</b>	
<b>Organisation: Surrey Wildlife Trust</b>	
<b>Response ID: 1116816</b>	
<b>Policy / Evidence Base / Part of Plan: Policy PS1: Responding to the climate emergency</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: Please note that Surrey Wildlife Trust is not commenting on issues of legal compliance/soundness or Duty to Cooperate and are selecting 'yes' as only yes/no options available.
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: Please note that Surrey Wildlife Trust is not commenting on issues of legal compliance/soundness or Duty to Cooperate and are selecting 'yes' as only yes/no options available.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: Please note that Surrey Wildlife Trust is not commenting on issues of legal compliance/soundness or Duty to Cooperate and are selecting 'yes' as only yes/no options available.
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
The Wildlife Trusts advocate Nature-Based Solutions (NBS) as a way to respond to climate change. Nature-based Solutions are natural responses to a number of challenges including development; food and water security; emergency risk management, as well as climate change. NBS range from protecting or restoring existing ecosystems, or being imbedded in new projects that protect or enhance the natural environment ranging from restoration of hedgerows, rivers and peatland, planting seagrass and the reintroduction of locally extinct species. Therefore, we would welcome the reference to nature-based solutions within policy PS1- responding to the climate emergency. Suggested amendments are set out in the next section.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	

"1) All development must respond to the climate emergency by:

(a) Directing development towards locations that minimise the need to travel and maximise the ability to make trips by sustainable modes of transport including cycling, walking and public transport.

(b) Delivering an efficient use of land especially on the most accessible sites.

© Providing more walkable and cyclable neighbourhoods (Twenty Minute Neighbourhoods) that reduce demand for the use of private vehicles.

(d) Considering how the natural environment in the locality can be restored; protected or enhanced to help address climate change

2) Sustainable design and construction will be integral to new development in the Borough. All planning applications<sup>11</sup> must include evidence that the below will be addressed, using as a minimum the Sustainable Construction Checklist:

(a) Maximising energy efficiency and integrating the use of renewable and zero carbon energy (demonstrated through an energy statement);

(b) Optimising the site orientation, building form, layout, landscaping and materials to maximise natural light and heat, whilst avoiding internal overheating by providing passive cooling and ventilation;

© Incorporate environmentally sustainable construction and demolition techniques that provide for the efficient use of minerals including a proportion of recycled or secondary aggregates, and encourage the re-use of construction and demolition waste at source or its separation and collection for recycling;

3) In residential development (including replacements, conversions and subdivisions)

(a) Achieve water efficiency of 110 litres per person per day<sup>12</sup> and where feasible provide rainwater harvesting techniques;

(b) Incorporate active electrical vehicle charging points in accordance with the latest guidance issued by Surrey County Council<sup>13</sup>;

© Where CHP distribution networks already exist, new developments are required to connect to them or be connection-ready, unless it can be clearly demonstrated that utilising a different energy supply would be more sustainable or connection is not feasible. The impacts of the CHP plants emissions upon air quality must be assessed in accordance with Policy E4;

(d) Incorporate measures for the secure storage of cycles and storage of waste including recyclable waste;

(e) Incorporate ecological enhancements within buildings or within landscaping as part of net gain proposals that will assist in mitigation impacts of climate change; for example prevent soil erosion or preventing flooding" ...

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Cheryl Brunton (41751713)</b>	
<b>Organisation: Surrey Wildlife Trust</b>	
<b>Response ID: 1116820</b>	
<b>Policy / Evidence Base / Part of Plan: Policy PS2: Designing places and spaces</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: Please note that Surrey Wildlife Trust is not commenting on issues of legal compliance/soundness or Duty to Cooperate and are selecting 'yes' as only yes/no options available.
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: Please note that Surrey Wildlife Trust is not commenting on issues of legal compliance/soundness or Duty to Cooperate and are selecting 'yes' as only yes/no options available.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: Please note that Surrey Wildlife Trust is not commenting on issues of legal compliance/soundness or Duty to Cooperate and are selecting 'yes' as only yes/no options available.
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
We think it would be useful to make reference to biodiversity net gains in this policy. Surrey Nature Partnership's position (which Surrey Wildlife supports) is to adopt a minimum 20% BNG policy. the position statement can be found at recommendation-for-20-bng-in-surrey_snp-november2020_final.pdf (wordpress.com) Recommended additional wording is included in the next section.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
...	

4) All new development should: (a) incorporate landscape to enhance the setting of the development; (b) avoid the loss of trees and other vegetation worthy of retention and supplemented with additional high-quality planting, or where retention is not feasible or desirable provide for high quality replacement planting, demonstrating a 20% biodiversity net gain following the spatial hierarchy of habitat delivery; and (c) provide for suitable boundary treatment to enhance the setting. ...

**Question 6:** You can upload any modifications below.

No, I do not wish to participate in hearing session(s)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Cheryl Brunton (41751713)</b>	
<b>Organisation: Surrey Wildlife Trust</b>	
<b>Response ID: 1116842</b>	
<b>Policy / Evidence Base / Part of Plan: Policy SP1: Staines-upon-Thames</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: Please note that Surrey Wildlife Trust is not commenting on issues of legal compliance/soundness or Duty to Cooperate and are selecting 'yes' as only yes/no options available.
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: Please note that Surrey Wildlife Trust is not commenting on issues of legal compliance/soundness or Duty to Cooperate and are selecting 'yes' as only yes/no options available.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: Please note that Surrey Wildlife Trust is not commenting on issues of legal compliance/soundness or Duty to Cooperate and are selecting 'yes' as only yes/no options available.
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
The River Thames is a valuable wildlife habitat, rivers are Habitats of Principal Importance protected under the NERC Act 2006. The site is also a SNCI. The Trust is of the view that design should consider wildlife using this valuable corridor, for example being mindful of lighting which affects Bats usual foraging/commuting behaviour.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
...“10) There are opportunities for attractive riverside development and public realm enhancement, which can also benefit wildlife. Improved access will be encouraged in order to maximise the asset that is the River Thames-side location”...	
<b>Question 6: You can upload any modifications below.</b>	

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Cheryl Brunton (41751713)</b>
<b>Organisation: Surrey Wildlife Trust</b>

<b>Response ID: 1116855</b>	
<b>Policy / Evidence Base / Part of Plan: Policy SP5: Colne Valley Regional Park</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: Please note that Surrey Wildlife Trust is not commenting on issues of legal compliance/soundness or Duty to Cooperate and are selecting 'yes' as only yes/no options available.
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: Please note that Surrey Wildlife Trust is not commenting on issues of legal compliance/soundness or Duty to Cooperate and are selecting 'yes' as only yes/no options available.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: Please note that Surrey Wildlife Trust is not commenting on issues of legal compliance/soundness or Duty to Cooperate and are selecting 'yes' as only yes/no options available.
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
The extent to which River Colne (from Airport Way To Staines Moor) SNCI and King George VI Reservoir SSSI are included within the Regional Park should be referenced, as these are important habitats which should be protected.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No Response	
<b>Question 6: You can upload any modifications below.</b>	
No Response	



**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Cheryl Brunton (41751713)</b>
<b>Organisation: Surrey Wildlife Trust</b>

<b>Response ID: 1116858</b>	
<b>Policy / Evidence Base / Part of Plan: Policy SP6: River Thames and its Tributaries</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: Please note that Surrey Wildlife Trust is not commenting on issues of legal compliance/soundness or Duty to Cooperate and are selecting 'yes' as only yes/no options available.
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: Please note that Surrey Wildlife Trust is not commenting on issues of legal compliance/soundness or Duty to Cooperate and are selecting 'yes' as only yes/no options available.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: Please note that Surrey Wildlife Trust is not commenting on issues of legal compliance/soundness or Duty to Cooperate and are selecting 'yes' as only yes/no options available.
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
The Council should note S40 of the NERC Act which states that when exercising its functions, a public authority should have regard to the purpose of conserving biodiversity which includes in relation to a type of habitat, restoring or enhancing a habitat. Therefore, development proposals within the Thames and its tributaries will need to comply with the NERC Act. The Trust does not support any development proposals that will affect the SNCI. Suggested amendments are set out in the next section.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	

“...The Council supports opportunities to increase the use of the rivers for tourism and improving river-based and riverside recreation and leisure activities. All development proposals should protect and enhance the river and its setting as a valuable resource for biodiversity, wildlife, and as an SNCI and a Habitat of Principal Importance. Where possible and where there will be no adverse effect on the SNCI, development proposals should support infrastructure such as boatyards, moorings, jetties and safety equipment etc. ...”

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Cheryl Brunton (41751713)</b>	
<b>Organisation: Surrey Wildlife Trust</b>	
<b>Response ID: 1116809</b>	
<b>Policy / Evidence Base / Part of Plan: Policy SP7: Heathrow Airport</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: Please note, The Trust is not making comments on legal compliance or soundness of the draft Local Plan and are choosing the 'yes' option as no other option except 'yes' or 'no' are available.
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: Please note, The Trust is not making comments on legal compliance or soundness of the draft Local Plan and are choosing the 'yes' option as no other option except 'yes' or 'no' are available.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: Please note, The Trust is not making comments relating to Duty to co-operate and are choosing the 'yes' option as no other option except 'yes' or 'no' are available.
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
As set out in our response to the Council's Issue and Options consultation, The Wildlife Trusts oppose airport capacity expansion. Surrey Wildlife Trust objects to airport expansion at Heathrow. In particular, the Trust objects to any proposals that have an adverse impact on SNCIs or other important habitat.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Amended wording set out below	

(b) permitting development proposals outside the airport or Development Consent Order (DCO) Limits boundary<sup>23</sup> in the Borough for Airport Supporting Development (ASD)<sup>24</sup> particularly those that support economic development if they:

- Protect and enhance designated areas of existing environmental character including Sites of Nature Conservation Importance, areas of landscape value, the Borough's historic and cultural heritage (including historic buildings and Conservation Areas), habitats particularly within Biodiversity Opportunity Areas, including urban biodiversity areas and open space of amenity and recreation value;
- demonstrate ecological offsetting and incorporate mitigation measures to achieve 20% biodiversity net gain;

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Cheryl Brunton (41751713)</b>
<b>Organisation: Surrey Wildlife Trust</b>

<b>Response ID: 1116860</b>	
<b>Policy / Evidence Base / Part of Plan: Policy E1: Green and Blue Infrastructure</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: Please note that Surrey Wildlife Trust is not commenting on issues of legal compliance/soundness or Duty to Cooperate and are selecting 'yes' as only yes/no options available.
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: Please note that Surrey Wildlife Trust is not commenting on issues of legal compliance/soundness or Duty to Cooperate and are selecting 'yes' as only yes/no options available.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: Please note that Surrey Wildlife Trust is not commenting on issues of legal compliance/soundness or Duty to Cooperate and are selecting 'yes' as only yes/no options available.
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
As set out in our earlier response to Climate Change emergency, The Wildlife Trusts advocate Nature-Based Solutions (NBS) as a way to respond to climate change. Therefore, we advise reference be made to NBS in the policy.	
Recommended amended wording is set out below	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	

...5. Green and blue infrastructure should be planned, designed and managed in an integrated way, utilising the principles of Nature-Based Solutions, to achieve multiple benefits and should ensure appropriate longterm stewardship arrangements are in place to secure the quality of green and blue infrastructure in perpetuity41 . ...

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Cheryl Brunton (41751713)</b>
<b>Organisation: Surrey Wildlife Trust</b>

<b>Response ID: 1116866</b>	
<b>Policy / Evidence Base / Part of Plan: Policy E2: Biodiversity</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: Please note that Surrey Wildlife Trust is not commenting on issues of legal compliance/soundness or Duty to Cooperate and are selecting 'yes' as only yes/no options available.
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: Please note that Surrey Wildlife Trust is not commenting on issues of legal compliance/soundness or Duty to Cooperate and are selecting 'yes' as only yes/no options available.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: Please note that Surrey Wildlife Trust is not commenting on issues of legal compliance/soundness or Duty to Cooperate and are selecting 'yes' as only yes/no options available.
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
As a general point, we recommend including the Nature Recovery Networks and BOAs on the policies proposals map, as it is important to identify where good wildlife habitat is located to understand where there are gaps and which area should be protected, restored, created and joined together to achieve recovery.	
With regards to 'priority habitat' and 'priority species' referenced in point 2 of the policy, we would suggest that habitats and species of principal importance, which are protected under the NERC Act are more than locally important.	
With regards to point 4 of the policy, The Trust is opposed to any development proposals that have an adverse impact on sites of habitat value. We advise that the mitigation hierarchy needs to be followed and ensure that measurable biodiversity net gains are provided.	



**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

The Trust is of the view that point 4 of the policy be removed, as we are opposed to any development proposals adversely impacting SNCIs and LNRs.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Cheryl Brunton (41751713)</b>
<b>Organisation: Surrey Wildlife Trust</b>

<b>Response ID: 1120951</b>
<b>Policy / Evidence Base / Part of Plan: Policy E2: Biodiversity</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Representation originally made against all site allocations in years 1-5 (2023-2027), years 6-10 (2028-2032) and years 11-15 (2033-2037) General point to make about allocations: could reference 20% biodiversity net gain, reference BOAs (i.e. TV03/TV04) contributions/improvements a specific allocation could have to those in the area.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Representation originally made against all site allocations in years 1-5 (2023-2027), years 6-10 (2028-2032) and years 11-15 (2033-2037) General point to make about allocations: could reference 20% biodiversity net gain, reference BOAs (i.e. TV03/TV04) contributions/improvements a specific allocation could have to those in the area.
<b>Question 6: You can upload any modifications below.</b>
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Cheryl Brunton (41751713)</b>
<b>Organisation: Surrey Wildlife Trust</b>

<b>Response ID: 1121353</b>
<b>Policy / Evidence Base / Part of Plan: Policy E3: Managing Flood Risk</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
<p>“Ancient/veteran tree-A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value.”</p> <p>-This does not apply necessarily to veteran trees. Veteran trees are affected by their environment in some way, for example lightning strike, which has allowed it to develop features such as deadwood or decay that are present on ancient trees and which make capable of providing valuable wildlife habitat. Age and size are not indicators of a tree being ‘veteran’ when it is not ancient.</p> <p>“International, national and locally designated sites of importance for biodiversity”</p> <p>-Does this include SNCIs and LNRs local sites?</p>
<b>Question 6: You can upload any modifications below.</b>
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Ms Miriam Buckova (40262625)</b>	
<b>Organisation:</b>	
<b>Response ID: 1126879</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
I'm living in Stanwell and regarding the Spelthorne local plan 2022-203 I would like to say behalf our neighbourhood, there is not enough benches, to sit in our park next to the St.Mary the Virgin church. There are only two old benches for whole park. Also as a many people are quite active, outdoor gym would be great option to support local community health and free time.	
<b>Question 6:</b> You can upload any modifications below.	
Miriam Buckova 20-06-22.msg <a href="https://spelthorne.inconsult.uk/gf2.ti/af/1409506/619797/PDF/-/Buckova_%20Miriam%20-%20photos.pdf">https://spelthorne.inconsult.uk/gf2.ti/af/1409506/619797/PDF/-/Buckova_%20Miriam%20-%20photos.pdf</a>	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Lynne Bulmer (24338305)</b>
<b>Organisation:</b>

<b>Response ID: 1111667</b>
<b>Policy / Evidence Base / Part of Plan:</b> General comment - not evidence base
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: Reasonably
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
This whole thing is too technical for ordinary people
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response





<b>Respondent: Mr Willaim Burton (41658753)</b>
<b>Organisation:</b>

<b>Response ID: 1124235</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Just to say that we object to this development in the Green Belt
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No Response
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Satvinder Buttar (37824353)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117449</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Please find the attached detailed submissions for Local Green Space, the submission contains location map, photo, reason and contact details. These locations are critical to be protected, and is highly valued by local residents. I would also like to take the opportunity to thank you for all your hard work on the local plan, this is appreciated by the residents of Spelthorne.	
<b>Question 6:</b> You can upload any modifications below.	
Brar + Buttar - LGS Hengrove Crescent ANS 2209p_Redacted.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619546/PDF/-/Brar%20%5F%20Buttar%20%2D%20LGS%20Hengrove%20Crescent%20ANS%202209p%5FRedacted%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619546/PDF/-/Brar%20%5F%20Buttar%20%2D%20LGS%20Hengrove%20Crescent%20ANS%202209p%5FRedacted%2Epdf</a>	

Brar + Buttar - LGS Kenilworth Road ANS 2209p\_Redacted.pdf  
<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619547/PDF/-/Brar%20%5F%20Buttar%20%2D%20LGS%20Kenilworth%20Road%20ANS%202209p%5FRedacted%2Epdf>

Brar + Buttar - LGS Clare Road ANS 2209p\_Redacted.pdf  
<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619548/PDF/-/Brar%20%5F%20Buttar%20%2D%20LGS%20Clare%20Road%20ANS%202209p%5FRedacted%2Epdf>

Brar + Buttar - LGS Scotts Close ANS 2209p\_Redacted.pdf  
<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619549/PDF/-/Brar%20%5F%20Buttar%20%2D%20LGS%20Scotts%20Close%20ANS%202209p%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Alan Byrne (19549377)</b>
<b>Organisation:</b> Historic England

<b>Response ID:</b> 1122579
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS3: Heritage, Conservation and Landscape
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
As the government adviser's on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages of the planning process. There are many issues and matters in the consultation document that are beyond the remit and concern of Historic England and our comments are, as required, limited to matters relating to the historic environment and heritage assets. In our previous comments (by letter dated 17 <sup>th</sup> January 2022), Historic England focused on the objective off the National Planning Policy Framework to set out a positive strategy for the conservation, enjoyment and enhancement of the historic environment [NPPF, Paragraph 28]; and contain policies to deliver the conservation and enhancement of the historic environment [NPPF, Paragraph 185]. Our comments on the Regulation 18 stage draft Local Plan largely have largely addressed in the current Publication version or are, in our view, not now likely to affect the soundness of the Local Plan.

We welcome the inclusion of policies for the historic environment in the local plan that meet the obligation for preparing the positive strategy required by the NPPF. The key test of the soundness of the plan and achievement of sustainable development as defined in the NPPF in respect of the elements that relate to the historic environment, in our view, have been met.

We should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise where we consider that these would have an adverse effect upon the historic environment. We hope that these comments are useful.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Ms Celia Caliskan (25423713)</b>
<b>Organisation:</b>

<b>Response ID: 1125939</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No comment
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: Yes, relevant and addresses the important issues
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No comment
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No comment
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
The Plan is comprehensive and covers the areas that are important to me; green and blue space, affordable housing, effective affordable transport, sustainability. Given the storms, heatwave and pandemic, the excuse to use green belt doesn't make sense. We should be reducing the carbon footprint by reusing our built environment, not knocking buildings down and using more energy and resources to replace them. Making more of the brownfield sites as work patterns change is a big opportunity. I'm really pleased to see that there is a focus to make more of the rivers and surrounding areas in the borough. They were fantastic places to go in lock-down. I agree with the Council that the calculation used for housing is unfair and will lead to higher densities, more likely to be seen in the London boroughs.



**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No

<b>Respondent: Joanne Capper (25693857)</b>	
<b>Organisation:</b> Richmond and Wandsworth Borough Councils	
<b>Response ID:</b> 1112422	
<b>Policy / Evidence Base / Part of Plan:</b> Duty to Cooperate	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Thank you for consulting the London Borough of Richmond upon Thames on the Regulation 19 Draft Spelthorne Local Plan. We have in previous correspondence and discussions with Spelthorne identified: housing as a strategic, cross-boundary issue between our	Additional Comments: Thank you for consulting the London Borough of Richmond upon Thames on the Regulation 19 Draft Spelthorne Local Plan. We have in previous correspondence and discussions with Spelthorne identified: housing as a strategic, cross-boundary issue between ou
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Tucker Carolyn (40286497)</b>
<b>Organisation:</b>

<b>Response ID: 1114442</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
One and two bedroom flats do not help families who need affordable homes in Staines. All this will do is bring people in from abroad and other areas - usually business couples - very few will be families. This is not providing homes for local people - this is creating money for developers - nothing much here for local people! Please STOP building high rise buildings to hit Government targets - flats will not benefit the people who live in Staines or local to Staines. Most young people and families struggle to be able to afford a flat - if they get shared ownership they have their mortgage, rent, rates and living costs i.e. heating, cooking, elect or gas plus maintenance charges.

The Old Debenhams building could be converted into flats? Plus a great indoor shopping mall that would bring tourists to the hotels in and around Staines. Local talent should be able to rent out affordable space in and around Staines, bringing in talent and young artistic, enthusiastic entrepreneur's. More affordable homes for families with young and older children with areas for children to play. How many councillors that pass these plans for high rise flats actually live in Staines or live Locally? If you don't live there then you should and must listen to the people who do - forget Government targets - there are safety nets and reasons to object to all of these proposed developments. Why not look at those that are needed. I.e. the Oast House has been empty for years now. How about that being your first priority from plans - sympathetic development only - then look at affordable family homes - not loads of high rise flats!!!!

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Tucker Carolyn (40286497)</b>
<b>Organisation:</b>

<b>Response ID: 1112350</b>
<b>Policy / Evidence Base / Part of Plan: Policy SP1: Staines-upon-Thames</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
One and two bedroom flats do not help families who need affordable homes in Staines. All this will do is bring people in from abroad and other areas - usually business couples - very few will be families. This is not providing homes for local people - this is creating money for developers - nothing much here for local people! Please STOP building high rise buildings to hit Government targets - flats will not benefit the people who live in Staines or local to Staines. Most young people and families struggle to be able to afford a flat - if they get shared ownership they have their mortgage, rent, rates and living costs i.e. heating, cooking, elect or gas plus maintenance charges.

The Old Debenhams building could be converted into flats? Plus a great indoor shopping mall that would bring tourists to the hotels in and around Staines. Local talent should be able to rent out affordable space in and around Staines, bringing in talent and young artistic, enthusiastic entrepreneur's. More affordable homes for families with young and older children with areas for children to play. How many councillors that pass these plans for high rise flats actually live in Staines or live Locally? If you don't live there then you should and must listen to the people who do - forget Government targets - there are safety nets and reasons to object to all of these proposed developments. Why not look at those that are needed. I.e. the Oast House has been empty for years now. How about that being your first priority from plans - sympathetic development only - then look at affordable family homes - not loads of high rise flats!!!!

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Richard Carr (19553185)</b>	
<b>Organisation:</b> Transport for London	
<b>Response ID:</b> 1126444	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
In taking forward the development strategy including major development sites, we would encourage you to consider access to public transport, the capacity of the public transport and highway networks and the need for transport improvements, both in Spelthorne and in neighbouring boroughs. There is a strong relationship between Spelthorne and London – a high proportion of residents commute out of the borough into London for employment using rail links into London. Crossrail 2 would provide an improved rail link in terms of frequency and capacity, into London and serve Kempton Park, Sunbury on Thames, Upper Halliford and Shepperton rail stations. Crossrail 2 is a project that is subject to future decisions for both funding and approval of powers. Although development work on the project has been paused, 2015 safeguarding directions remain in force	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	
<b>Question 6:</b> You can upload any modifications below.	
No Response	



**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Richard Carr (19553185)</b>
<b>Organisation:</b> Transport for London

<b>Response ID:</b> 1113552
<b>Policy / Evidence Base / Part of Plan:</b> Policy SP1: Staines-upon-Thames
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Thank you for consulting Transport for London (TfL) on the draft Staines Development Framework. We have an interest in the Framework because we operate cross boundary bus services on routes 117, 203, 216 and 290 serving Staines town centre. Bus routeings through the town centre are two-way and currently work well from an operational and passenger perspective. If any changes are proposed to restrict access to town centre streets, it is essential that access for buses is maintained. We welcome proposals for the bus station which are designed to strengthen and enhance bus interchange and set out in the Design and Movement section of the Framework. Location and Type of Bus Station Interchange In section 5.46 three options for the location include 1. Reconfigure the bus facility, but keep it in the current location;

2. close the bus facility and move it to another location; or

3. adapt the facility keeping it in its current location and to also seek additional provision in one or more other additional locations

We understand that the third option will involve dispersal of bus stops rather than a central consolidated facility.

Our strong preference would be for a single consolidated facility as this is generally better for passengers as a focus for bus activity. In any scenario we will need access to driver toilets. In a dispersed scenario we would need driver toilets within 200m and 2 minutes walking distance of the furthest stands so this might mean multiple toilet facilities which would otherwise be provided within the bus station itself. From an operational perspective we don't have a clear preference between a reconfigured or relocated bus station (options 1 or 2). The important factor would be the suitability of the road network for bus movements to or from the bus station. Currently there are only two ways to reach the bus station, via the High Street (which is the route taken by TfL bus services) or Laleham Road. Laleham Road has a low bridge and therefore restricts its use to single deck services. Ideally we would have more than one access/egress route that is suitable for double deck buses for resilience.

Decisions on location will partly depend on the type of facility and in section 5.49 three broad options are set out

1. Bus station with bays and enclosed passenger facilities;

2. Bus interchange with islands and quality passenger facilities;

3. On-street interchange zones (simple layout forms); or a variety of options.

Our preference is for a single consolidated facility for bus passengers (i.e. options 1 or 2) with fully accessible stops. Generally we would be happy with either bays or islands. However TfL buses have an issue with bays that does not apply to other operators. This is due to the fact that TfL buses have 2 sets of doors and the wheelchair ramp is at the middle doors. Therefore a bay arrangement where buses drive in and reverse out – quite common in bus stations outside London – does not work for TfL buses. This is because only the front door is adjacent to a kerb in this type of layout and that means our drivers cannot deploy the ramp. We would want to ensure that any facility can be accessed by buses in forward gear and not require any reverse movements. Again it is worth emphasising that we will need access to driver toilets at any replacement bus station

All of the TfL routes in Staines operate at 3 buses per hour so we would require standing space for 4 buses to meet our standards. This would also allow for potential future increases in frequency to 4 buses per hour if this were justified by increased demand.

Any proposals should ensure that the views of bus operators including TfL are sought at the initial design stage before any decisions are taken. Regardless of which options are taken forward, it will be important that 4 bus stands for TfL services can be provided. Continuity of operation will need to be ensured and any temporary disruption to services should be minimised. If the bus station has to be closed temporarily during reconstruction, TfL will require suitable alternative bus stand space and driver toilets so that bus operations can be maintained for the duration. If a replacement facility is to be provided, the existing bus station should remain open until the new facility is fully operational.

Public Parking

We welcome the intention to rationalise and redevelop car parks with the aim of reducing parking provision in the town centre.

Residential Parking Standards

We welcome an approach which adopts lower residential parking standards and encourages car free or car lite development in the town centre, consistent with the approach taken by neighbouring boroughs in London.  
We trust that these comments can be taken into account when taking forward the Development Framework and we look forward to more detailed liaison as options for the bus station are developed and initial designs are tested

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Richard Carr (19553185)</b>
<b>Organisation:</b> Transport for London

<b>Response ID:</b> 1115622
<b>Policy / Evidence Base / Part of Plan:</b> Policy SP7: Heathrow Airport
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Thank you for consulting Transport for London (TfL). TfL has a number of strategic transport interests in the area including cross boundary bus services, Crossrail 2, a potential southern rail access to Heathrow, and the impact of development on road corridors managed by TfL as part of the Transport for London Road Network (TLRN), specifically the A30 and A316 corridors. In taking forward the development strategy including major development sites, we would encourage you to consider access to public transport, the capacity of the public transport and highway networks and the need for transport improvements, both in Spelthorne and in neighbouring boroughs. There is a strong relationship between Spelthorne and London – a high proportion of residents commute out of the borough into London for employment using rail links into London. Crossrail 2 would provide an improved rail link in terms of frequency and capacity, into London and serve

Kempton Park, Sunbury on Thames, Upper Halliford and Shepperton rail stations. Crossrail 2 is a project that is subject to future decisions for both funding and approval of powers. Although development work on the project has been paused, 2015 safeguarding directions remain in force. TfL remains greatly concerned by the impacts of an expanded Heathrow were it to be brought forward again, including with regard to surface access and air quality. If these impacts are to be addressed – and in line with the mode share targets in the Mayor’s Transport Strategy, as well as those in the Airports National Policy Statement – it is essential that a range of surface access interventions are implemented to secure sustainable mode shift. Policy SP7 should provide explicit support for measures to improve bus services, cycling and walking. SP7 does recognise the need for Southern Rail Access (SRA) but then focuses on promoting the borough’s preferred Southern Light Rail scheme. While such a scheme would provide direct access to Staines town centre, its potential to drive mode shift would be limited in the absence of the fast, direct links to key centres in South London and Surrey that would be a key feature of other SRA options. The concern is that the Light Rail scheme would fail to restrict growth in highway congestion and air pollution, including within Spelthorne.

Given the proximity to London, we would be grateful, if you would consider extending some of the Mayor’s strategic transport policy objectives to the borough including the promotion of Healthy Streets, rebalancing the transport system towards walking, cycling and public transport, improving air quality and reducing road danger.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Richard Carr (19553185)</b>	
<b>Organisation:</b> Transport for London	
<b>Response ID:</b> 1126446	
<b>Policy / Evidence Base / Part of Plan:</b> Policy SP7: Heathrow Airport	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
TfL remains greatly concerned by the impacts of an expanded Heathrow were it to be brought forward again, including with regard to surface access and air quality. If these impacts are to be addressed – and in line with the mode share targets in the Mayor’s Transport Strategy, as well as those in the Airports National Policy Statement – it is essential that a range of surface access interventions are implemented to secure sustainable mode shift. Policy SP7 should provide explicit support for measures to improve bus services, cycling and walking. SP7 does recognise the need for Southern Rail Access (SRA) but then focuses on promoting the borough’s preferred Southern Light Rail scheme. While such a scheme would provide direct access to Staines town centre, its potential to drive mode shift would be limited in the absence of the fast, direct links to key centres in South London and Surrey that would be a key feature of other SRA options. The concern is that the Light Rail scheme would fail to restrict growth in highway congestion and air pollution, including within Spelthorne.	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Richard Carr (19553185)</b>
<b>Organisation:</b> Transport for London

<b>Response ID:</b> 1115654
<b>Policy / Evidence Base / Part of Plan:</b> Policy ID1: Infrastructure and Delivery
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Thank you for consulting Transport for London (TfL). TfL has a number of strategic transport interests in the area including cross boundary bus services, Crossrail 2, a potential southern rail access to Heathrow, and the impact of development on road corridors managed by TfL as part of the Transport for London Road Network (TLRN), specifically the A30 and A316 corridors. In taking forward the development strategy including major development sites, we would encourage you to consider access to public transport, the capacity of the public transport and highway networks and the need for transport improvements, both in Spelthorne and in neighbouring boroughs. There is a strong relationship between Spelthorne and London – a high proportion of residents commute out of the borough into London for employment using rail links into London. Crossrail 2 would provide an improved rail link in terms of frequency and capacity, into London and serve

Kempton Park, Sunbury on Thames, Upper Halliford and Shepperton rail stations. Crossrail 2 is a project that is subject to future decisions for both funding and approval of powers. Although development work on the project has been paused, 2015 safeguarding directions remain in force. TfL remains greatly concerned by the impacts of an expanded Heathrow were it to be brought forward again, including with regard to surface access and air quality. If these impacts are to be addressed – and in line with the mode share targets in the Mayor’s Transport Strategy, as well as those in the Airports National Policy Statement – it is essential that a range of surface access interventions are implemented to secure sustainable mode shift. Policy SP7 should provide explicit support for measures to improve bus services, cycling and walking. SP7 does recognise the need for Southern Rail Access (SRA) but then focuses on promoting the borough’s preferred Southern Light Rail scheme. While such a scheme would provide direct access to Staines town centre, its potential to drive mode shift would be limited in the absence of the fast, direct links to key centres in South London and Surrey that would be a key feature of other SRA options. The concern is that the Light Rail scheme would fail to restrict growth in highway congestion and air pollution, including within Spelthorne.

Given the proximity to London, we would be grateful, if you would consider extending some of the Mayor’s strategic transport policy objectives to the borough including the promotion of Healthy Streets, rebalancing the transport system towards walking, cycling and public transport, improving air quality and reducing road danger.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Stuart Carruthers (19545249)</b>	
Organisation:	
<b>Response ID: 1122383</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Evidence Base - SFRA	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No - Not Positively Prepared, Not Justified, Not Effective, Not Consistent with National Policy	Additional Comments: No - Not Positively Prepared, Not Justified, Not Effective, Not Consistent with National Policy
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No - Not Positively Prepared, Not Justified, Not Effective, Not Consistent with National Policy
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No - Not Positively Prepared, Not Justified, Not Effective, Not Consistent with National Policy	Additional Comments: No - Not Positively Prepared, Not Justified, Not Effective, Not Consistent with National Policy
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
The SFRA should identify FZ3b - this is the LPA responsibility.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Stuart Carruthers (19545249)</b>
<b>Organisation:</b>

<b>Response ID: 1122379</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not justified, Not effective, Not consistent with national policy - were also selected Spelthorne identifies that it has an OAN of 618 dwellings over the plan period and that it needs to provide 9,270 dwellings. According to the UK Census in 2011 0.68% of the Households living in the borough lived in caravans (270 households). This means that over the plan period an additional 63 caravan (9270*0.0068) homes are required. The GTAA is dated 2018 and must be considered as being out-of-date. It fails to identify that ethnic Gypsy / Travellers have first 'bite' of any caravan accommodation made available by the Local Plan. The policy fails to comply with paragraph 62 of the NPPF. This effectively identifies that there should be an equality of opportunity in accommodation choice. The SA fails to place equality issues at its centre.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>

The plan needs to be modified to ensure compliance with equalities legislation and existing demographics.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Caravan homes are normally a contentious issue. I am equally well qualified in determining population requirements as the Council's consultants.

<b>Respondent: Mr Stuart Carruthers (19545249)</b>
<b>Organisation:</b>

<b>Response ID: 1124644</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not justified, Not effective, Not consistent with national policy - were all selected The Policies map identifies in an arbitrary way which areas of the existing Green Belt should be removed. The Policies map fails to identify areas of Green Belt that can be used for development (small scale) that incorporates landscape improvements.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
The policies map needs to be changed to identify opportunity areas in the Green Belt for small scale development that incorporates landscape improvements. This would enable retention of areas of Green Belt that perform better in meeting the Green Belts purpose.
<b>Question 6:</b> You can upload any modifications below.
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Caravan homes are normally a contentious issue. I have an extensive knowledge of development on Green Belt.



<b>Respondent: Mr Stuart Carruthers (19545249)</b>
<b>Organisation:</b>

<b>Response ID: 1122378</b>
<b>Policy / Evidence Base / Part of Plan: Policy SP6: River Thames and its Tributaries</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not justified, Not effective, Not consistent with national policy - were all selected Provision needs to be made for boat dwellers. The SA failed to consider that increasing numbers of people are living on houseboats and that these require access to facilities.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Needs of boat dwellers need to be considered.
<b>Question 6: You can upload any modifications below.</b>
No Response

**Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?**

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Caravan homes are normally a contentious issue. I have an extensive knowledge of development on Green Belt.

<b>Respondent: Mr Stuart Carruthers (19545249)</b>
<b>Organisation:</b>

<b>Response ID: 1122370</b>
<b>Policy / Evidence Base / Part of Plan: Policy H1: Homes for All</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not justified, Not effective, Not consistent with national policy - were all selected Provision needs to be made for boat dwellers, and those that live in caravans. The SA failed to consider that increasing numbers of people are living on houseboats and caravans and that these require access to facilities.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Needs of boat dwellers and caravan dwellers need to be considered.
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
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Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Caravan homes are normally a contentious issue. I have an extensive knowledge of development on Green Belt.

<b>Respondent: Mr Stuart Carruthers (19545249)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122372</b>	
<b>Policy / Evidence Base / Part of Plan: Policy H2: Affordable Housing</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>Not justified, Not effective, Not consistent with national policy - were also selected</p> <p>Most Gypsy/ Travellers live on social housing estates (Council Gypsy Sites). These tend to be slums. Spelthorne needs to ensure that all public sites in the Borough meet acceptable standards to ensure sustainable development.</p> <p>At least one additional social housing site for Gypsy/ Travellers appears to be needed.</p> <p>The SA failed to consider that Council's provide poor quality accommodation to their tenants. This includes overcharging for utilities (water and electricity increasing the effects of deprivation). It also needs to be taken into account that many Council's provide accommodation to homeless people on Gypsy / Traveller Sites (public and private)</p>	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Role of Council's as responsible social landlord needs to be identified. Rachmanite tendencies need to be identified and articulated by the LP A with how it intends to resolve any deprivation caused.	

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: It is unlikely that Surrey Council's will wish to concede that they are Rachmanite in their provision of social housing.

<b>Respondent: Stuart Carruthers (31327969)</b>	
<b>Organisation:</b>	
<b>Response ID: 1114460</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy H3: Meeting the needs of Gypsy, Traveller and Travelling Showpeople	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>Local Plan</p> <p>There appears to have been a failure to apply the standard method correctly, and also to ensure that adequate provision is made for Gypsy / Travelling Showmen in the district due to confusion in how the issues are calculated.</p> <p>1. The Secretary of State has recently identified that the s188 (enforcement and stop notice register) is definitive of a LPAs planning enforcement decision making. The Secretary of State has identified that the status of the s188 register has never been considered by the Court but that this would be for a LPA to challenge its own registered decision making. The issues appear to have arisen due to Council lawyers / planning staff not having correctly interpreted statute. The result is that most LPAs have granted unconditional planning permission for areas of Green Belt against which they have taken</p>	

enforcement for residential use, storage of hardstanding etc. This is by identifying in the s188 register that a breach of planning control in the register has no requirements. This is an automatic grant of planning permission under s173(11).

2. The way to claim the right where there is confusion is through an application under s192 and simply include a copy of the register entry. Attached is a copy of the s188 register entry for Sheepwalk. This grants unconditional residential caravan use to a large area of land. The issue has been through the Planning Inspectorate and has also been examined by DLUHC. The conclusion is that there has been a failure in statutory interpretation by Council's acting as LPAs, and that substantial areas of Green Belt has been released by LPAs that meet most of their accommodation needs (as determined using the standard method).

3. The majority of LPAs have failed to take account of the planning consents that they have granted acting as a planning authority under s173(11). This normally has a significant effect on supply of residential land with planning permission particularly for caravan use. This potentially impacts on decision making by the Environment Agency and their agents. All of the land at Sheepwalk has been granted unconditional planning permission for the standing of residential caravans.

4. The reason that this issue has arisen is because planning is in the main a separate jurisdiction to law. The interpretation of statute is the same for both jurisdictions and must mean must. There has in the main been a failure to interpret legislation correctly under the Planning Acts. The result is an LPA is able to seek judicial review of its registration decisions provided they inform those affected. Otherwise they stand. The Office of Parliamentary Counsel identifies that Bennion needs to be examined.

5. It is believed that prior to an application under s192 for the land at Sheepwalk that a meeting with the LPA would be beneficial ?

**Question 6:** You can upload any modifications below.

Queen's Bench Associate's-Blank Order.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/579512/PDF/-/Queen%5Fs%20Bench%20Associate%5Fs%20Blank%20Order%2Epdf>

page 31-32.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/579513/PDF/-/page%2031%2D32%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Stuart Carruthers (19545249)</b>
<b>Organisation:</b>

<b>Response ID: 1122374</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy H3: Meeting the needs of Gypsy, Traveller and Travelling Showpeople
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not justified, Not effective, Not consistent with national policy - were all selected Spelthorne has been spectacularly unsuccessful in meeting the accommodation needs of its Gypsy/ Traveller population. A large number have sought to develop homes within Green Belt area 55. There have been a large number of court cases at unsustainable expense. There have been deaths. Many of the Borough's Gypsy/ Travellers have been excluded from living in Spelthorne at the request of Spelthorne Council. The GTAA is an underestimate. It is dated 2018. It is not accurate. The Council needs to have all public sites made subject to audit to ensure that they are fit for human habitation (meet the requirements of the Caravan Sites Act, 1960 licensing regime). Similar studies need to be undertaken for private sites. Areas of opportunity for Gypsy / Travellers and Showpeople to develop homes need to be identified in the Green Belt. This should be linked to landscape improvements.

The SA failed to consider that Council's provide poor quality accommodation to their tenants. This includes overcharging for utilities (water and electricity increasing the effects of deprivation). It also needs to be taken into account that many Council's provide accommodation to homeless people on Gypsy/ Traveller Sites (public and private)

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

The Plan needs to identify broad areas of opportunity where Gypsy / Travellers and Showmen are able to develop homes within the Green Belt.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: It is unlikely that Surrey Council's will wish to concede how they have acted to clear their Gypsy/ Traveller/ Showmen population from the area.

<b>Respondent: Mr Stuart Carruthers (19545249)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122369</b>	
<b>Policy / Evidence Base / Part of Plan: Policy E2: Biodiversity</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Not justified, Not effective, Not consistent with national policy - were all selected The Council has identified Biodiversity Opportunity areas within its Local Plan and within Policy E2. Policy E2 identifies that these are the most important areas for biodiversity in the borough. The majority of the Biodiversity Opportunity areas are in the Green Belt as identified by the policies map. Most residential gardens in Spelthorne (even Ali Gee's) will have higher levels of biodiversity (per m2) to that identified in the proposals map. There is likely to be higher levels of biomass on the identified areas. The Council identifies that it will support development proposals in Biodiversity Opportunity areas. Provision needs to be articulated for development that is enabled within the Green Belt for this policy not to be meaningless.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
There needs to be clear identification of development within Biodiversity areas that is acceptable within the Green Belt.	
<b>Question 6: You can upload any modifications below.</b>	

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: The policy appears to be flawed.

<b>Respondent: Mr Stuart Carruthers (19545249)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122381</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E3: Managing Flood Risk	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Not justified, Not effective, Not consistent with national policy - were all selected There appears to be a mapping issue - and areas of land have been identified as being in Flood Zone 3b when this is not the case. The SFRA should identify FZ3b - this is the LPA responsibility. Flood Zone 3b is the area of Gypsy/ Traveller/ Showman Development. Large areas of land are to be removed from risk of flooding by the Thames Flood Alleviation Scheme. It is likely that this land will be developed within the plan period.	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
The Council needs to check its maps.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Stuart Carruthers (19545249)</b>
<b>Organisation:</b>

<b>Response ID: 1122365</b>
<b>Policy / Evidence Base / Part of Plan: AS2/006 (Land East of Desford Way)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not justified, Not effective, Not consistent with national policy - were all selected The site is possibly too small to deliver 15 showmen pitches.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: D J Carter (41987777)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117188</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
LGS : Ashford Common : Stroud Way The small green bordered by Courtfield Road, Stroud Way and Landon Way has been used by generations of children as a play area. Our own daughter played on the green as did our grandchildren. There is a mature tree on the green and it's nice to look out of the window and see it every day. The green is one of the reasons we bought our house thirty-nine years ago, it's a feature of the cul-de-sac. Many years ago, after consultation with the residents, three parking bays were installed on the three sides of the green. If the green is developed, we could lose nine car parking spaces.	
<b>Question 6:</b> You can upload any modifications below.	

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: CARLO CARUSO (41938753)</b>
<b>Organisation:</b>

<b>Response ID: 1116558</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS2: Designing places and spaces	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: I assume this has been validated abs legally compliant
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: There are a lot of numbers and not a guarante that samples have been taken in the right order/place
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Alban Cassidy [Cassidy + Ashton Group Ltd] (19532737)</b>
<b>Organisation: Shepperton LLC</b>

<b>Response ID: 1120476</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not justified, Not effective, Not consistent with national policy - WERE ALL SELECTED The Local Plan is considered to be unsound in respect of the housing land supply referred to in Policy ST2. Although the housing requirement is not disputed at this stage, the sources of supply are disputed with the Local Plan overestimating likely build-out rates and also not providing a sufficient range of sites and locations to meet the varied needs of the housing market. As such, due to too many similar sites being allocated, delivery will inevitably slow and there will also not be a sufficient variety of locations and housing types to meet all sectors of the market. Our position is supported by the evidence base gathered to support the preparation of the Local Plan, particularly the 'Planning for Housing Delivery' document prepared by GL Hearn and issued on 17 <sup>th</sup> August 2022, has concluded that the Council cannot identify five years' worth of housing land supply. This lack of supply may also worsen affordability in the Borough, which would put pressure on non allocated sites, including within the green belt, to release land under very special circumstances. In feeling to identify sufficient sites for housing i is considered that the Council have failed to recognise suitable sites for release from the Green Belt that could represent sustainable urban extensions to help meet requirements.

There is an evident opportunity to release a parcel of land from the Green Belt, adjacent to the Shepperton settlement boundary (Land East of Sheep Walk), to act as a sustainable urban extension, on a site that will consist of previously developed land, to meet both housing need and mix requirements. The development of the land would not compromise the overall character and purpose of the Spelthorne Green Belt, Moreover, the implementation of the River Thames Scheme proposes the creation of a Country Park on site, following the deposition of spoil on site. However, there is no provision for future management and maintenance of the Country Park and the proposed housing development would be able to contribute towards this.

The justification for the proposal is set out in the occupying Promotional Document.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

It is considered that the housing supply should be increased, as the evidence base suggests the Council cannot demonstrate five years' worth of housing land supply and the range of sites identified for housing should be increased in number, location and variety. Land Land East of Sheep Walk in Shepperton should be released from the Green Belt to contribute towards meeting the identified shortfall in housing supply.

**Question 6:** You can upload any modifications below.

Shepperton LLC -Redacted Promotional Document Location Plan - Cassidy & Ashton.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618819/PDF/-/Shepperton%20LLC%20%2DRedacted%20Promotional%20Document%20Location%20Plan%20%2D%20Cassidy%20%5F%20Ashton%2Epdf>

Shepperton LLC - Redacted Promotional Document - Cassidy & Ashton.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618820/PDF/-/Shepperton%20LLC%20%2D%20Redacted%20Promotional%20Document%20%2D%20Cassidy%20%5F%20Ashton%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: There are a number of issues all relating to ensuring housing supply, and how these can be addressed, which require in depth consideration at the hearing session.

<b>Respondent: Mr Alban Cassidy [Cassidy + Ashton Group Ltd] (19532737)</b>
<b>Organisation: Shepperton LLC</b>

**Response ID: 1125639**

**Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough**

**Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be **legally compliant**?**

Yes/No/Not answered: Yes	Additional Comments: Yes Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
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**Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be **sound**?**

Yes/No/Not answered: No	Additional Comments: No Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
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**Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan **complies with the Duty to co-operate**?**

Yes/No/Not answered: Yes	Additional Comments: Yes Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
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**Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.**

Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response

**Question 4: Please give details of why you consider the Local Plan is **not legally compliant** or is **unsound** or **fails to comply with the duty to co-operate**. Please be as precise as possible.**

If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
All responses Not Positively Prepared, Not Justified, Not Effective, Not Consistent with National Policy were selected.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
<p>Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible:</p> <p>The Local Plan is considered to be unsound because it fails to allocate land East of Sheep Walk, Shepperton for residential development and as such will therefore fail to be positively prepared, fail to provide sufficient number or range of housing sites and therefore not meet the needs of the Borough during the plan period.</p> <p>In feeling to identify sufficient sites for housing it is considered that the Council have failed to recognise suitable sites for release from the Green Belt that could represent sustainable urban extensions to help meet requirements.</p> <p>There is an evident opportunity to release the land, which lies adjacent to the Shepperton settlement boundary (Land East of Sheep Walk), to act as a sustainable urban extension, on a site that will consist of previously developed land, to meet both housing need and mix requirements. The development of the land would not compromise the overall character and purpose of the Spelthorne Green Belt,</p> <p>Moreover, the implementation of the River Thames Scheme proposes the creation of a Country Park on site, following the deposition of spoil on site. However, there is no provision for future management and maintenance of the Country Park and the proposed housing development would be able to contribute towards this.</p> <p>The justification for the proposal is set out in the occupying Promotional Document.</p> <p>Suggested Modifications:</p> <p>Land Land East of Sheep Walk in Shepperton should be released from the Green Belt and allocated for development as set out in this Representation and the accompanying Promotional Document.</p> <p>See attached document for full rep.</p>
<b>Question 6:</b> You can upload any modifications below.
<p>Shepperton LLC -Redacted Promotional Document Location Plan - Cassidy &amp; Ashton.pdf  <a href="https://spelthorne.inconsult.uk/gf2.tj/a/1409506/618821/PDF/-/Shepperton%20LLC%20%2DRedacted%20Promotional%20Document%20Location%20Plan%20%2D%20Cassidy%20%5F%20Ashton%2Epdf">https://spelthorne.inconsult.uk/gf2.tj/a/1409506/618821/PDF/-/Shepperton%20LLC%20%2DRedacted%20Promotional%20Document%20Location%20Plan%20%2D%20Cassidy%20%5F%20Ashton%2Epdf</a></p>
Shepperton LLC - Redacted Promotional Document - Cassidy & Ashton.pdf



<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618822/PDF/-/Shepperton%20LLC%20%2D%20Redacted%20Promotional%20Document%20%2D%20Cassidy%20%5F%20Ashton%20Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: There are a number of issues all relating to ensuring housing supply, and how these can be addressed, which require in depth consideration at the hearing session.

<b>Respondent: Mr Alban Cassidy [Cassidy + Ashton Group Ltd] (19532737)</b>	
<b>Organisation: Shepperton LLC</b>	
<b>Response ID: 1126649</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
As such Shepperton offers a suitable location and opportunity for a sustainable urban extension alongside a Country Park, as proposed by the Environment Agency as part of the River Thames Scheme. The residential element of the scheme could contribute towards the future management and maintenance of the Country Park.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
The merits of Shepperton as a sustainable location for development in its own right should be identified in the policy. This should facilitate the identification of land east of Sheep Walk, Shepperton for allocation as a residential development and country park, with the latter being created following the deposition of spoil associated with the River Thames Scheme..	
<b>Question 6: You can upload any modifications below.</b>	
Shepperton LLC -Redacted Promotional Document Location Plan - Cassidy & Ashton.pdf	

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618823/PDF/-/Shepperton%20LLC%20%2DRedacted%20Promotional%20Document%20Location%20Plan%20%2D%20Cassidy%20%5F%20Ashton%2Epdf>

Shepperton LLC - Redacted Promotional Document - Cassidy & Ashton.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618824/PDF/-/Shepperton%20LLC%20%2D%20Redacted%20Promotional%20Document%20%2D%20Cassidy%20%5F%20Ashton%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: The merits of Shepperton as a suitable and sustainable location for development need to be considered in depth at the hearing sessions.

<b>Respondent: Mr Alban Cassidy [Cassidy + Ashton Group Ltd] (19532737)</b>	
Organisation: Shepperton LLC	
<b>Response ID: 1120529</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy SP2: Ashford, Shepperton and Sunbury Cross	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>Not effective - was also selected.</p> <p>We consider that the Local Plan is unsound with particular regard to Policy SP2: Ashford, Shepperton and Sunbury Cross. This Policy has assessed the towns of Ashford, Shepperton and Sunbury Cross together, rather than individually recognising the different constraints and opportunities that each area is characterised by.</p> <p>A separate Sustainability Appraisal for each town would acknowledge that Shepperton is a highly sustainable location for new development. Additional information in support of this representation is set out in the attached Promotional Document.</p>	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	
<b>Question 6:</b> You can upload any modifications below.	
Shepperton LLC Promotional Document.pdf	

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/593062/PDF/-/Shepperton%20LLC%20Promotional%20Document%2Epdf>

Shepperton LLC Promotional Document Location Plan.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/593063/PDF/-/Shepperton%20LLC%20Promotional%20Document%20Location%20Plan%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: The merits of Shepperton as a suitable and sustainable location for development need to be considered in depth at the hearing sessions.

<b>Respondent: Mr Alban Cassidy [Cassidy + Ashton Group Ltd] (19532737)</b>
<b>Organisation: Shepperton LLC</b>

<b>Response ID: 1120530</b>
<b>Policy / Evidence Base / Part of Plan: Policy SP6: River Thames and its Tributaries</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not effective - was also selected. The Local Plan is unsound in regard to Policy SP6: River Thames and its Tributaries, especially in respect to the lack of detail provided in the Policy in relation to the River Thames Scheme. The River Thames Scheme is likely to be the largest infrastructure scheme in Spelthorne within the plan period and it is clear that it will both have a significant impact and create significant opportunities for development. For the policy to simply say that the Council supports the scheme in principle and welcomes the proposed new footpath connection is a gross failing of the plan to take into account a unique opportunity for integrated development which takes advantage of new opportunities created by the River Thames Scheme. The Scheme proposes a Country Park at Shepperton after the disposition of spoil and if this is to be taken forward the Plan should identify this area and also acknowledge that this will create the opportunity for a sustainable urban extension to Shepperton, which will contribute towards a funding mechanism for the management and maintenance of the Country Park.

Further details are set out in the Promotional Document that accompanies these representations.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

The Policy should include further detail in respect to the River Thames Scheme including the identification of sustainable development opportunities that will arise from it.

This should include the provision of a Country Park at Land East of Sheep Walk, Shepperton, with adjacent residential development as a sustainable urban extension.

See attached document.

**Question 6:** You can upload any modifications below.

Shepperton LLC Promotional Document.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/593074/PDF/-/Shepperton%20LLC%20Promotional%20Document%2Epdf>

Shepperton LLC Promotional Document Location Plan.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/593075/PDF/-/Shepperton%20LLC%20Promotional%20Document%20Location%20Plan%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: The River Thames Scheme is likely to be the largest infrastructure project in Spelthorne within the plan period and should be considered in depth at the hearing sessions.

<b>Respondent: Mr Alban Cassidy [Cassidy + Ashton Group Ltd] (19532737)</b>
<b>Organisation: Shepperton LLC</b>

<b>Response ID: 1120528</b>
<b>Policy / Evidence Base / Part of Plan: Policy H1: Homes for All</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not justified, Not effective - were also selected We consider that the Local Plan is unsound with particular regard to Policy H1: Homes for All. Housing Need It is considered that the housing supply targets are not accurate and the Council have overestimated likely build-out rates. The evidence base gathered to support the preparation of the Local Plan, particularly the 'Planning for Housing Delivery' document prepared by GL Hearn and issued on 17 <sup>th</sup> August 2022, has concluded that the Council cannot identify five years' worth of housing land supply. This lack of supply may also worsen affordability in the Borough, which would require the release of additional Green Belt sites. It is considered that the Council have failed to recognise alternative Green Belt sites that could represent a sustainable urban extension to meet supply requirements. Housing Mix and Standards



The SHMA has been used as an evidence base to assess the identified housing needs of the local area. The findings of the SHMA identified a need for two-bed, three-bed, and four-bed properties, particularly as demographic trends demonstrated growing young families. The sites that have been allocated for housing development, and those identified for release from the Green Belt, will not meet the identified need of housing mix and standards. The sites released from the Green Belt designation are small in size and piece-meal throughout the urban area, and lend themselves to accommodate small-scale dwellinghouses, or apartment units within high-rise buildings, rather than family oriented homes, for which there is an identified need.

There is an evident opportunity to release a parcel of land from the Green Belt, adjacent to the Shepperton settlement boundary (Land East of Sheep Walk), to act as a sustainable urban extension, to meet both housing need and mix requirements. The development of the land would not compromise the overall character and purpose of the Spelthorne Green Belt,

Moreover, the implementation of the River Thames Scheme would create a unique opportunity to facilitate a Country Park on site, alongside a high-quality residential development on previously developed land, following the deposition of spoil on site.

Further details are set out in the Promotional Document which accompanies this representation.

See attached document.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

We suggest the release of Land East of Sheep Walk from the Green Belt to contribute towards meeting the identified shortfall in housing supply. Revision of Policy H1 to ensure the housing supply upon which it relies is accurate and justified.

**Question 6:** You can upload any modifications below.

Shepperton LLC Promotional Document.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/593050/PDF/-/Shepperton%20LLC%20Promotional%20Document%2Epdf>

Shepperton LLC Promotional Document Location Plan.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/593051/PDF/-/Shepperton%20LLC%20Promotional%20Document%20Location%20Plan%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: There are a number of issues all relating to ensuring housing supply is both accurate and achieved, which require in depth consideration at the hearing session.

<b>Respondent: Mr Alban Cassidy [Cassidy + Ashton Group Ltd] (19532737)</b>
<b>Organisation: Shepperton LLC</b>

<b>Response ID: 1120478</b>
<b>Policy / Evidence Base / Part of Plan: Policy E1: Green and Blue Infrastructure</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
The opportunities for green infrastructure should include for the provision of a country park at Shepperton. This has been identified as part of the River Thames Scheme. It is understood that the funding mechanism for this facility is unknown and it is acknowledged that new development can play a part in facilitating the funding for this and other facilities. This representation offers a development opportunity adjacent to the country park which could support the long-term maintenance and management of the country park. This would adhere to the long-term stewardship requirements of this policy.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Policy E1 should be amended to include reference to the country park at Shepperton and that it will require funding for long term management and maintenance which could be provided for my residential development
<b>Question 6: You can upload any modifications below.</b>
Shepperton LLC Promotional Document.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/592653/PDF/-/Shepperton%20LLC%20Promotional%20Document%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/592653/PDF/-/Shepperton%20LLC%20Promotional%20Document%2Epdf</a>

Shepperton LLC Promotional Document Location Plan.pdf

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: There are a number of issues all relating to the provision of a country park at Shepperton, following implementation of the River Thames Scheme, which need to be considered in depth at the hearing sessions.

<b>Respondent: Mr Alban Cassidy [Cassidy + Ashton Group Ltd] (19532737)</b>
<b>Organisation: Shepperton LLC</b>

<b>Response ID: 1120518</b>
<b>Policy / Evidence Base / Part of Plan: Policy E3: Managing Flood Risk</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Policy E3 is unsound because it does not make sufficient reference to the River Thames Scheme, other than to say that the proposed route will be safeguarded, and the impact that this will have upon flood risk and flood relief in large parts of Spelthorne Borough. Policy E3 should make it clear that consideration will be given to the opportunities arising from the River Thames Scheme which will provide flood relief to much of the Borough including the site which is the subject of representations by Shepperton LLC and associated landowners.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Policy E3 should give greater significance to the River Thames Scheme and the benefits that will result in terms of areas that will no longer be subject to flood risk. The plan should also use the River Thames Scheme to identify new locations for development, such as the subject site, which are in sustainable locations, on previously developed land and will no longer be in a flood zone.

See attached document for full response.

**Question 6:** You can upload any modifications below.

Shepperton LLC Promotional Document.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/592979/PDF/-/Shepperton%20LLC%20Promotional%20Document%2Epdf>

Shepperton LLC Promotional Document Location Plan.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/592980/PDF/-/Shepperton%20LLC%20Promotional%20Document%20Location%20Plan%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: The relationship of the River Thames Scheme to future flood risk and flood alleviation in Spelthorne has not been addressed in the Local Plan and needs to be considered in depth at the hearing sessions.

<b>Respondent: Mr Alban Cassidy [Cassidy + Ashton Group Ltd] (19532737)</b>
<b>Organisation: Shepperton LLC</b>

<b>Response ID: 1120519</b>
<b>Policy / Evidence Base / Part of Plan: Policy E5: Open Space and Recreation</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
The relationship of the River Thames Scheme to future flood risk and flood alleviation in Spelthorne has not been addressed in the Local Plan and needs to be considered in depth at the hearing sessions.
See attached document for full response.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Policy E5 should be revised to make specific reference to the provision of a new Country Park at Shepperton as part of the River Thames Scheme. It should also state that its long term maintenance and management will be supported by new residential development on adjacent land.
<b>Question 6: You can upload any modifications below.</b>
Shepperton LLC Promotional Document.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/592985/PDF/-/Shepperton%20LLC%20Promotional%20Document%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/592985/PDF/-/Shepperton%20LLC%20Promotional%20Document%2Epdf</a>

Shepperton LLC Promotional Document Location Plan.pdf

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: There are a number of issues relating to the River Thames Scheme which run through the plan, including the provision and future management of a country park at Shepperton, which need to be considered in depth at the hearing sessions.



<b>Respondent: Mr Alban Cassidy [Cassidy + Ashton Group Ltd] (19532737)</b>
<b>Organisation: Shepperton LLC</b>

<b>Response ID: 1120521</b>
<b>Policy / Evidence Base / Part of Plan: Policy ID1: Infrastructure and Delivery</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
The River Thames Scheme is one of the biggest infrastructure projects ever proposed in Spelthorne. In addition to reference under Policy SP6, it should therefore also be referenced in ID1. Failure to do so means that the plan is not positively prepared or sound as the development will have a substantial impact upon Spelthorne which will influence future development locations and for this not to be taken into account in preparing the plan means that the policies and proposals will not take into account the applications of the Scheme and the opportunities it creates. Reference should also be made to the provision of a country park at Shepperton as part of the Thames Scheme and how developers can support the future management of this.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Policy ID1 should cross refer to Policy SP and specifically make reference to the Thames scheme. This should also be taken into account in the preparation of all of the plan's policies and proposals.

Reference should also be included to the provision of a country park at Shepperton and opportunity for a developer to support its long-term maintenance and management.

**Question 6:** You can upload any modifications below.

Shepperton LLC Promotional Document.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/592992/PDF/-/Shepperton%20LLC%20Promotional%20Document%2Epdf>

Shepperton LLC Promotional Document Location Plan.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/592993/PDF/-/Shepperton%20LLC%20Promotional%20Document%20Location%20Plan%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: The failure of the plan to make reference in Policy ID1 to the largest infrastructure project and the implications this has for future development in Spelthorne is a significant flaw and needs discussion during the hearing sessions for the Local Plan.

<b>Respondent: Cemex UK Properties Ltd (42188001)</b>
<b>Organisation:</b>

<b>Response ID: 1127828</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not Justified, Not Effective, Not Consistent with National Policy - were all selected. IN RESPECT OF POLICY ST2: The Policy states the housing requirement is 618 dpa which over the Plan period (2022-2037), results in a need of 9,270 dwellings. As set out below, we consider the Council has underestimated the actual level of need/supply owing to discrepancies with the housing requirement. Housing requirement We consider there is a need for the Council to apply a 20% buffer to the housing requirements. The NPPF at paragraph 74 requires a 20% buffer to be applied in accordance with the Housing Delivery Test ('HDT') "where there has been a significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply" The 2021 HDT results were published on 14 <sup>th</sup> January 2022 by the then Ministry of Housing Communities and Local Government ('MHCLG'). The results identified that Spelthorne delivered just 69% of its housing requirement against the HDT. This has resulted in the Presumption of Sustainable Development being applied, regardless of the 5YHLS position. This is against a backdrop of previous poor HDT results – 50% in 2020 and 60% in 2019. It is unclear why only a 5% buffer is applied and we advocate for the use of a 20% buffer on top of the assessed Local Housing Need ('LHN') figure.

#### Elements of Supply

The proposed housing supply comprises of five elements<sup>1</sup> :

- Allocations;
- Brownfield Tier 2 sites (> 5 units);
- Windfall: Small sites;
- Windfall: Office to residential permitted development; and
- Under construction.

Together these comprise a proposed supply of 9,439 dwellings, which is 169 dwellings over the total housing requirement for 2020-2035. We support this overprovision but there remains a number of issues with the elements of the supply in relation to the Allocations and Brownfield Tier 2 sites. We therefore consider the Policy is unsound.

#### Allocations

6,073 units will be delivered via allocated sites. 5,244 of these are in the urban area whilst 829 are in the Green Belt. Delivery of new homes on brownfield urban sites is difficult and sites often face policy and site-specific delivery challenges. Viability is often an issue which could cause non-compliant levels of affordable housing and small flatted units, if schemes come forward at all. On the other hand, delivery of new homes on Green Belt sites allows for family houses to be delivered with policy compliant levels of affordable housing, helping to meet the need of local communities. We contend that a greater percentage of Green Belt sites should be released to provide new homes given the uncertainty associated with deliverability of brownfield urban sites. In light of the clear need to find additional housing sites, the oversight of land adjacent to Squires Garden Centre, Halliford Road, Shepperton (Site A) which in accordance with the NPPF, is deliverable in that it is available, suitable, achievable and viable, should be rectified.

#### Brownfield Tier 2 sites (under five units)

1,729 homes will be delivered on small brownfield sites. Similarly, to our comments above, viability can be even more of an issue on smaller sites that have a smaller capital return and often higher upfront costs. We consider such a reliance on small sites to be a risky approach and contend that more Green Belt sites should be released which are promoted and have more certainty of being delivered. In summary, we consider there is too great a reliance on the delivery of small brownfield sites where there are likely to be viability and other site constraints - we therefore consider the Policy unsound.

Please see enclosed letter that provides the composite response. (attached)

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

Given the extent of housing need in the Borough and past under-delivery, further Green Belt release is required to ensure the Local Plan has identified a sufficient amount of new homes on sites that are truly deliverable and which is based on a positively prepared, justified, effective and sound spatial strategy.

Please see enclosed letter that provides the composite response.(attached)

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To confirm that Exceptional Circumstances exist to justify the release of additional Green Belt land for residential and industrial development and that the Council's Green Belt Assessment of sites HS1/005 – Land adjacent to Squires Garden Centre, Halliford Road, Shepperton (for residential) and SN1/008 – Land south of Perimeter Road, Stanwell (for industrial/commercial uses) are incorrect and that both sites should be released from the Green Belt and allocated.

Please see enclosed letter that provides the composite response.

<b>Respondent: Cemex UK Properties Ltd (42188001)</b>	
<b>Organisation:</b>	
<b>Response ID: 1127862</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p><b>PLAN PERIOD</b></p> <p>Whilst we support the decision of the Council to extend the Local Plan from 2035 to 2037 with a start date of 2022, given protracted examinations for Local Planning Authorities that are faced with similar constraints (the Green Belt) in areas like Tandridge and Welwyn Hatfield, we consider it unlikely that the Local Plan will be submitted, examined, and adopted over the next 12 months, with an adoption date more likely to be 2024 or indeed 2025. Thus, with the NPPF (paragraph 21) requiring strategic policies “should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure”, we suggest the end date is extended to allow for a protracted examination and to ensure the Local Plan is in accordance with the NPPF. Furthermore, with major infrastructure projects like Heathrow still on the horizon, to ensure the Local Plan is positively prepared, it is vital that an end of date of at least 2039/2040 is used. To note, the need to extend the end date of the Local Plan is also supported by the HBF.</p>	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	

**SUGGESTED MODIFICATIONS:**

**PLAN PERIOD**

With the NPPF (paragraph 21) requiring strategic policies “should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure”, we suggest the end date is extended to allow for a protracted examination and to ensure the Local Plan is in accordance with the NPPF. Furthermore, with major infrastructure projects like Heathrow still on the horizon, to ensure the Local Plan is positively prepared, it is vital that an end of date of at least 2039/2040 is used. Please see enclosed letter that provides the composite response.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Plan Period: Yes, I wish to participate in hearing session(s). To confirm that Exceptional Circumstances exist to justify the release of additional Green Belt land for residential and industrial development. Further, to continue to highlight that the Council’s Green Belt Assessment of sites HS1/005 – Land adjacent to Squires Garden Centre, Halliford Road, Shepperton and SN1/008 – Land south of Perimeter Road, Stanwell are incorrect and that both sites should be released from the Green Belt and allocated for development.

<b>Respondent: Cemex UK Properties Ltd (42188001)</b>
<b>Organisation:</b>

<b>Response ID: 1127839</b>
<b>Policy / Evidence Base / Part of Plan: Policy SP3: Stanwell and Stanwell Moor</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not justified, Not effective, Not consistent with national policy - were all selected. IN RESPECT OF POLICY SP3: Whilst we consider the Local Plan is unsound, we support this policy (subject to amendments) and especially reference to the Council securing improved economic, social and environmental benefits. We also agree with the supporting text (paragraph 5.14) that Stanwell and Stanwell Moor are both heavily impacted by Heathrow Airport. Therefore, any improvements to facilities and infrastructure could benefit local communities. We have described above how Site B (SN1/008 Land south of Perimeter Road, Stanwell), which is in close proximity to Heathrow was included in the expansion proposals for car parking. Notwithstanding the Site could be brought forward for commercial uses, the provision of car parking could potentially provide offset improvements to local highways infrastructure and facilitate improvements to sustainable transport. Please see enclosed letter that provides the composite response. (attached)



**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

The release of the Site from the Green Belt would allow these transportation and economic benefits to come to fruition and the ensure the principles of the Policy are met.

Please see enclosed letter that provides the composite response. (attached)

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To confirm that Exceptional Circumstances exist to justify the release of additional Green Belt land. Further, that the Council's Green Belt Assessment of site SN1/008 – Land south of Perimeter Road, Stanwell is incorrect and that the Site should be released from the Green Belt and allocated for industrial/commercial uses.

Please see enclosed letter that provides the composite response.

<b>Respondent: Cemex UK Properties Ltd (42188001)</b>	
<b>Organisation:</b>	
<b>Response ID: 1127853</b>	
<b>Policy / Evidence Base / Part of Plan: Policy SP7: Heathrow Airport</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Not justified, Not effective, Not consistent with national policy - were all selected. IN RESPECT OF POLICY SP7 Whilst we support the Policy in principle, as discussed in response to Policy SP3, given the status of the expansion of Heathrow as a National Significant Infrastructure Project ('NSIP'), we consider the Council should afford more weight to those sites which were proposed to be included in the proposals. It is highly likely that political support and momentum for the expansion will return within the Local Plan period up 2037. We therefore consider the Policy unsound. Please see enclosed letter that provides the composite response.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
We have detailed in response to Policy SP4: Green Belt how we contend the Council has incorrectly assessed Site SN1/008 – Land south of Perimeter Road, Stanwell and in so doing, have simply ignored the Airport's identification of this land because it is in the Green Belt.	

Should the Site come forward as part of the Airport's expansion plans, then it is likely that a Very Special Circumstances case would be successful because of the strategic scale and importance of the NSIP and the significant economic and employment opportunities that would be achieved. We therefore suggest Land south of Perimeter Road, Stanwell is released from the Green Belt now with a site allocation for B8 uses, or other commercial uses. Please see enclosed letter that provides the composite response.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To confirm that Exceptional Circumstances exist to justify the release of additional Green Belt land. Further, that the Council's Green Belt Assessment of site SN1/008 – Land south of Perimeter Road, Stanwell is incorrect and that the Site should be released from the Green Belt and allocated for industrial/commercial uses. Please see enclosed letter that provides the composite response.

<b>Respondent: Cemex UK Properties Ltd (42188001)</b>
<b>Organisation:</b>

<b>Response ID: 1127818</b>
<b>Policy / Evidence Base / Part of Plan: Policy H1: Homes for All</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not justified, Not effective, Not consistent with national policy - were also selected. IN RESPECT OF POLICY H1 Policy H1 confirms the housing requirement of 618 dwellings per annum ('dpa') for the period up to 2037. We support the Council in utilising the standard methodology for assessing housing need as stated at footnote 1 of the Plan. The Government has been clear that the 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes. However, in the longer term, the Government has pledged to review the methodology and accordingly we can anticipate a revised methodology to be published prior to the adoption of the Local Plan, and possibly before its submission for EiP. Should this occur, further public consultation on any revised housing requirement should occur to ensure the approach is sound. Currently, we therefore suggest the Policy is unsound.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

Given this uncertainty, we suggest the Council should apply an approach to planning for its development needs by providing a 20% buffer. The 2021 HDT result was published on 14<sup>th</sup> January 2022 and for the Council, they recorded a score of 69% and therefore as a consequence the Presumption in favour of Sustainable Development is triggered, even if there is a 5YHLS. Although the Council is now contending it has a 5YHLS as shown in the Housing Trajectory and Five-Year Housing Supply Document, at an Appeal in only January 20221 the Borough confirmed it had a 4.5 year supply of housing. Due to this persistent under-delivery and lack of recent 5YHLS we contend that a 20% buffer should be applied.

Please see enclosed letter that provides the composite response. (attached)

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To confirm that Exceptional Circumstances exist to justify the release of additional Green Belt land for residential and industrial development and that the Council's Green Belt Assessment of sites HS1/005 – Land adjacent to Squires Garden Centre, Halliford Road, Shepperton (for residential) and SN1/008 – Land south of Perimeter Road, Stanwell (for industrial/commercial uses) are incorrect and that both sites should be released from the Green Belt and allocated for development.

<b>Respondent: Cemex UK Properties Ltd (42188001)</b>
<b>Organisation:</b>

<b>Response ID: 1127851</b>
<b>Policy / Evidence Base / Part of Plan: Policy EC1: Meeting Employment Needs</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not justified, Not effective, Not consistent with national policy - were all selected. IN RESPECT OF POLICY EC1 Policy EC1 states “proposals for new industrial, warehousing and storage (B2 and B8) floorspace will be directed to the industrial Strategic Employment Areas, any of the existing industrial estates and any sites where this use class of floorspace is included in the site allocation in the Local Plan”. As indicated above, given the proximity of Site SN1/008 – Land south of Perimeter Road, Stanwell to Heathrow Airport and its poor performance in Green Belt terms (as set out in our response to Policy SP4: Green Belt), the Site represents an ideal location for development in relation to the either the expansion of Heathrow Airport or to meet employment needs generally in Spelthorne. Spelthorne’s Employment Land Needs Assessment (ELNA) was produced in 2022 and reviews market evidence reports from Colliers, Cushman and Wakefield and JLL. The market intelligence reports confirm that demand for warehouse space reached a new level in 2021 in London and the Southeast and the lack of supply is driving up rental values to record levels. Growth is returning to Heathrow Airport following the pandemic and there is continued demand from retailers and parcel delivery to support the ever-growing online economy.

The ELNA confirms that 12,000sqm of B8 space will be required between 2022 and 2037. There is a forecast loss of 11,000sqm of B2 space during that time that the ELNA anticipates could be used by B8 uses. However, the spatial and logistical requirements for B8 uses are very different to B2 uses. B2 uses are often on much smaller plots of land dispersed on existing industrial estates that historically are not always best connected to road and rail infrastructure. B8 uses require large parcels of land for storage and HGV parking with close links to strategic road infrastructure. Often former B2 sites are simply not suitable for B8 uses. Therefore, it is unlikely that the 12,000sqm demand for B8 space can be met by the forecast loss of B2 space alone. We therefore consider the Policy unsound. Please see enclosed letter that provides the composite response.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

In summary, the ELNA demonstrates there is a significant need for new B8 space which we contend cannot be met by the forecast loss of B2 space alone. We therefore suggest that Land south of Permitted Road, Stanwell is released from the Green Belt and allocated for B8 uses to help meet the identified employment need and support the growing local economy. Please see enclosed letter that provides the composite response.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To confirm that Exceptional Circumstances exist to justify the release of additional Green Belt land. Further, that the Council's Green Belt Assessment of site SN1/008 – Land south of Perimeter Road, Stanwell is incorrect and that the Site should be released from the Green Belt and allocated for industrial/commercial uses. Please see enclosed letter that provides the composite response.

<b>Respondent: Cemex UK Properties Ltd (42188001)</b>	
<b>Organisation:</b>	
<b>Response ID: 1127833</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Evidence base - Housing Trajectory	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No	Additional Comments: No
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No	Additional Comments: No
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate: HOUSING TRAJECTORY AND FIVE-YEAR HOUSING LAND SUPPLY This document has been produced to outline how the housing requirement has been compiled and to demonstrate the Borough has a five-year housing land supply ('5YHLS'). Having reviewed the sites with planning permission (table 3), we do not believe the Renshaw Industrial Estate site should be included as outline planning permission ref: 17/01365 was granted on 27 <sup>th</sup> July 2018 and it does not appear that any Reserved Matters submissions have been submitted within the three year timeframe (up to 27 <sup>th</sup> July 2021) as required by Condition 1. Therefore, a new planning permission would be required to build the 275 units. A more recent planning application on the same site was refused in August 2021 for 397 build to rent apartments which strongly indicates that the 275	



homes consented in outline planning permission 17/01365 will never be implemented. We therefore contend that the 275 units associated with planning permission 17/01365 should be removed from the housing land supply calculations.

If the 275 units are removed, this would reduce the total supply to 3,855 (from 4,130) which equates to 771 units per annum. This would result in a lower 5YHLS of 5.2 years (compared to 5.6). Given the Borough's poor recent performance in respect of housing delivery, it is highly likely other consented schemes could fail to be implemented and using the revised supply, there are only 147 units between the Council being able to demonstrate a 5YHLS and not.

#### DUTY TO CO-OPERATE

The NPPF (paragraphs 24 to 27) confirms the Duty to Co-operate ('DtC') continues to be a basic procedural requirement of plan making. In particular, paragraph 26 details that this joint working should determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.

The purpose of the DtC is to ensure strategic priorities are properly co-ordinated and clearly reflected in Local Plans. The failure to demonstrate compliance with the DtC would render the Local Plan incapable of being found to be legally compliant. We support, therefore, the principle of the Council working with neighbouring authorities to address strategic issues and emphasise the need to continue this process throughout the Plan-making process. However, it is concerning that the Council is "only in the process of preparing statement of common ground outlining its cooperation with strategic bodies" 1 .

We suggest that given the stage (Regulation 19), the Local Plan should be based on already agreed positions on all strategic matters with all relevant parties. This is particularly important when it comes to the delivery of housing given the constraints of surrounding boroughs and the equal or greater housing pressures upon them. Thus, the Council will need to work proactively with its neighbouring authorities to ensure the needs are met.

There are also major infrastructure projects that whilst stalled, for instance, the planned expansion of a third runway for Heathrow Airport, should be taken into account given the importance of the National Significant infrastructure Project ('NSIP'). As set out in previous submissions, the anticipated benefits for the South East from the Heathrow expansion include up to £30bn in economic benefits and the creation of 33,200 new jobs. Given the immediate proximity of the Borough to Heathrow, it is perfectly placed to provide complementary development (both housing and economic) to the NSIP.

In this context, we emphasise in the strongest terms the need for the Council to address, as a minimum, its full Objectively Assessed Housing Need ('OAHN'), whilst also exploring options to go above this. As set out above, this will then ensure the Local Plan accords with the NPPF (paragraph 61). Whilst we support the Council in seeking to meet its own development needs (618 dpa), there remains an imperative that all possible options at going above this figure in order to accommodate potential unmet need from neighbouring authorities is also explored, as well as reflecting the substantial economic growth the area is anticipated to experience. In reviewing the DtC Statement of Compliance (May 2022) and with a focus on the strategic matter of housing, it is clear that with the seven neighbouring authorities<sup>1</sup> not being able to assist, the Council must look at further Green Belt release to ensure a sufficient buffer is incorporated.

The first test of soundness is unequivocal that a Plan can only be found to be “positively prepared” where it provides a strategy that as a minimum seeks to meet its own objectively assessed needs, as well as preparing agreements with other authorities to accommodate unmet need. At the moment and in consideration of the above, we do not consider it does.

#### EXAMINING PLANS

The NPPF (paragraph 35) requires that any plan submitted to the Secretary of State for examination must be capable of being found both legally compliant and sound. This places various duties on the Council including, but not limited to, ensuring the plan is:

- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with National Policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

It is therefore critical that the Local Plan sets a clear path between the identification of the strategic considerations and the allocation of land to facilitate the delivery of these priorities. However, as currently drafted, we have significant concerns that it doesn’t.

Furthermore, the NPPF (paragraph 61) is clear that Local Planning Authorities must seek to address their Local Housing Need (‘LHN’) as a minimum and this is addressed in response to our comments on the Duty to Cooperate. (as per attached document)

#### ALTERNATIVE SITES

A new Local Plan is required to ensure the future needs of residents and businesses in the Borough can be met through the sustainable development of sites. However, it is the omission of a number of sustainably located sites (for both housing and employment led uses) which we consider results in the spatial strategy of the Local Plan being unsound and in particular, CEMEX’s landholdings at land at the southern edge of Upper Halliford in Shepperton (identified on the plan below (Site A)) and land adjacent to the southern boundary of Heathrow Airport in Stanwell (Site B)).

#### OFFICER SITE ASSESSMENTS – DISCOUNTED ALTERNATIVE ALLOCATION SITES (JUNE 2022)

The sites are assessed under reference HS1/005 Land adjacent to Squires Garden Centre, Halliford Road, Shepperton and reference SN1/008 Land south of Perimeter Road, Stanwell.

There are some parts of the Officer Site Assessments – Discounted Alternative Allocation Sites (the ‘Assessment’) that we agree and support, whilst others we consider incorrect, do not agree with and consider unsound.

Our analysis is set out in response to Question 6 which concludes that both have been incorrectly assessed and the opportunity to allocate two deliverable sites (HS1/005 for residential and SN1/008 for industrial/commercial uses) have been missed). Please refer to attached document for large submission document, pages 9-13 appear to be relevant to HS1/005. Pages 17-22 appear to be relevant for site SN1/008..

#### SUGGESTED MODIFICATIONS:

##### HOUSING TRAJECTORY AND FIVE-YEAR HOUSING LAND SUPPLY

We therefore strongly recommend that further Green Belt sites (such as Site HS1/005 – Land adjacent to Squires Garden Centre, Halliford Road) are released to provide “specific, deliverable sites for years one to five of the plan period” (NPPF, paragraph 68) to ensure the Borough has a robust 5YHLS.

##### DUTY TO CO-OPERATE

We suggest that given the stage (Regulation 19), the Local Plan should be based on already agreed positions on all strategic matters with all relevant parties. This is particularly important when it comes to the delivery of housing given the constraints of surrounding boroughs and the equal or greater housing pressures upon them. Thus, the Council will need to work proactively with its neighbouring authorities to ensure the needs are met.

There are also major infrastructure projects that whilst stalled, for instance, the planned expansion of a third runway for Heathrow Airport, should be taken into account given the importance of the National Significant infrastructure Project (‘NSIP’). As set out in previous submissions, the anticipated benefits for the South East from the Heathrow expansion include up to £30bn in economic benefits and the creation of 33,200 new jobs. Given the immediate proximity of the Borough to Heathrow, it is perfectly placed to provide complementary development (both housing and economic) to the NSIP.

In this context, we emphasise in the strongest terms the need for the Council to address, as a minimum, its full Objectively Assessed Housing Need (‘OAHN’), whilst also exploring options to go above this. As set out above, this will then ensure the Local Plan accords with the NPPF (paragraph 61). Whilst we support the Council in seeking to meet its own development needs (618 dpa), there remains an imperative that all possible options at going above this figure in order to accommodate potential unmet need from neighbouring authorities is also explored, as well as reflecting the substantial economic growth the area is anticipated to experience. In reviewing the DtC Statement of Compliance (May 2022) and with a focus on the strategic matter of housing, it is clear that with the seven neighbouring authorities not being able to assist, the Council must look at further Green Belt release to ensure a sufficient buffer is incorporated.

The first test of soundness is unequivocal that a Plan can only be found to be “positively prepared” where it provides a strategy that as a minimum seeks to meet its own objectively assessed needs, as well as preparing agreements with other authorities to accommodate unmet need. At the moment and in consideration of the above, we do not consider it does.

##### EXAMINING PLANS

It is therefore critical that the Local Plan sets a clear path between the identification of the strategic considerations and the allocation of land to facilitate the delivery of these priorities.

##### ALTERNATIVE SITES

In summary, we contend our analysis as set out below and contained within the enclosed letter clearly demonstrates both Site HS1/005 – Land adjacent to Squires Garden Centre, Halliford Road, Shepperton and Site SN1/008 – Land south of Perimeter Road, Stanwell do not perform the purposes for which land is included in the Green Belt and as such, should be released from the Green Belt and allocated for development.

## DEVELOPMENT POTENTIAL

Site A – Land adjacent to Squires Garden Centre, Halliford Road, Shepperton (see attached page 5)

The Site is surrounded by existing built form on three sides whilst its southern boundary comprises a substantial line of mature trees, providing a strong defensible boundary. In the Council’s own assessment of the Site (2022) they consider:

- “the site offers limited tranquillity or a feeling of remoteness and is largely part of the urban area associated with Upper Halliford.”;
- “the visual amenity value of the site is limited by the enclosed nature of the site and current use as an overflow carpark”
- “the site is not subject to any major non absolute constraints”.

Given the positive features of the Site that the Council fully acknowledge, we continue to promote the Site as a logical infill for residential development between Squires Garden Centre and 109 Halliford Road. The Site would make an efficient use of existing services and infrastructure in Upper Halliford, as it is less than 0.5 miles from the shopping parade and community centre.

We consider that residential development is entirely appropriate in this location as it would complete the line of built form along Halliford Road from the junction with Upper Halliford Road and Gaston Bridge Road to the residential development around Tadmor Close.

Wider landholdings

CEMEX also owns a larger parcel of land to the south of Upper Halliford (as shown below – 49a) and we consider it relevant the Council is aware as this could come forward for development during the latter stages of the Local Plan. (map see attached)

Site B - Land south of Southern Perimeter Road, Stanwell (see attached page 7)

Given the Site’s direct access onto the Southern Perimeter Road and close proximity to the Strategic Road Network including the M25 and M4 motorways, we consider the Site has potential for a number of uses, inter alia, commercial including Business (Use Class E), General Industry (Use Class B2) and/or Storage or Distribution (Use Class B8).

The Site was also identified for car parking as part of the expansion of Heathrow Airport and we submitted representations confirming that CEMEX was ready to work in collaboration with Heathrow Airport Ltd (‘HAL’) for appropriate future uses which can be delivered by the market. Whilst proposals are on hold at Heathrow, CEMEX still consider the Site suitable for release, allocation and development for uses to support the expansion – with this including for car parking.

More recently (September 2022), the Site (referred to as Whitehall Farm) has been selected as a preferred site for aggregate recycling as part of Surrey County Council’s Minerals and Waste Local Plan.

We continue to confirm both sites are available and developable, with the potential to provide a contribution to meeting the Borough’s future housing/employment needs, acting as a key component to forming a Local Plan capable of being found sound at Examination in Public (‘EiP’)

OFFICER SITE ASSESSMENTS – DISCOUNTED ALTERNATIVE ALLOCATION SITES (JUNE 2022)

Please refer to attached document for large submission document. Pages 9-13 appear to be relevant to HS1/005. Pages 17-22 appear to be relevant for site SN1/008.

Please see enclosed letter that provides the composite response.

**Question 6:** You can upload any modifications below.

Cemex - Redacted Pre-Submission Local Plan Representations\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618876/PDF/->

[/Cemex%20%2D%20Redacted%20Pre%2DSubmission%20Local%20Plan%20Representations%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618876/PDF/-/Cemex%20%2D%20Redacted%20Pre%2DSubmission%20Local%20Plan%20Representations%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Housing Trajectory: Yes, I wish to participate in hearing session(s). To confirm that Exceptional Circumstances exist to justify the release of additional Green Belt land for residential development. Further, to continue to highlight that the Council's Green Belt Assessment of sites HS1/005 – Land adjacent to Squires Garden Centre, Halliford Road, Shepperton is incorrect and that it should be released from the Green Belt and allocated for residential development. Please see enclosed letter that provides the composite response.

Duty to Co-operate: Yes, I wish to participate in hearing session(s). Please see enclosed letter and response to Section 6(question 7 here)..

Examining Plans: Yes, I wish to participate in hearing session(s). Please see enclosed letter and response to Section 6 (question 7 here) – part of the discussion at Examination would be to highlight those deliverable sites that the Council has ignored/omitted.

Alternative Sites: Yes, I wish to participate in hearing session(s). Please see enclosed letter and response to Section 6 (question 7 here) – part of the discussion at Examination would be to highlight those deliverable sites that the Council has ignored/omitted.

Officer Site Assessments Discounted Alternative Allocation Sites (June 2022): - Yes, I wish to participate in hearing session(s). Please see enclosed letter and response to Section 6 above – part of the discussion at Examination would be to highlight those deliverable sites that the Council has ignored/sites which have been omitted.

Whilst CEMEX continue to support the principle of bringing forward a Local Plan, we contend a number of policies together with the evidence base are unsound, and if not addressed, would result in an unsound and non-legally compliant Local Plan being submitted. Consequently, and owing to the shortcomings of the evidence base, the opportunities of Site HS1/005 – Land adjacent to Squires Garden Centre, Halliford Road, Shepperton and SN1/008 – Land south of Perimeter Road, Stanwell have been missed and we suggest this should be rectified with both being released from the Green Belt. This approach would utilise sites which are suitable, available, deliverable and viable, and which will deliver additional dwellings (HS1/005) and provide valuable employment/industrial space which could come forward as part of the expansion proposals at Heathrow or on its own (SN1/008).



<b>Respondent: Cemex UK Properties Ltd (42188001)</b>
<b>Organisation:</b>

<b>Response ID: 1127836</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Plan as a whole	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Not justified, Not effective, Not consistent with national policy - were also selected. IN RESPECT OF POLICY SP4 Policy SP4 seeks to prevent inappropriate development within the Green Belt. Whilst we agree with the principle of the Policy, we certa	Additional Comments: No
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Not positively prepared Not justified, Not effective, Not consistent with national policy - were also selected. IN RESPECT OF POLICY SP4 Policy SP4 seeks to prevent inappropriate development within the Green Belt. Whilst we agree with the principl	Additional Comments: No Not positively prepared Not justified, Not effective, Not consistent with national policy - were also selected. <strong>IN RESPECT OF POLICY SP4</strong> Policy SP4 seeks to prevent inappropriate development within the Green Belt. Whilst we a
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Not justified, Not effective, Not consistent with national policy - were also selected. IN RESPECT OF POLICY SP4 Policy SP4 seeks to prevent inappropriate development within the Green Belt. Whilst we agree with the principle of the Policy, we certa	Additional Comments: No Not justified, Not effective, Not consistent with national policy - were also selected. <strong>IN RESPECT OF POLICY SP4</strong> Policy SP4 seeks to prevent inappropriate development within the Green Belt. Whilst we agree with the principle of

**Question 3a:** If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.

Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response

**Question 4:** Please give details of why you consider the Local Plan is **not legally compliant** or is **unsound** or **fails to comply with the duty to co-operate**. Please be as precise as possible.

If you wish to **support** the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:

No Response

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

In summary, we contend our analysis as set out below and contained within the enclosed letter clearly demonstrates both Site HS1/005 – Land adjacent to Squires Garden Centre, Halliford Road, Shepperton and Site SN1/008 – Land south of Perimeter Road, Stanwell do not perform the purposes for which land is included in the Green Belt and as such, should be released from the Green Belt and allocated for development.

Please see enclosed letter that provides the composite response.

SITE HS1/005 – Land adjacent to Squires Garden Centre, Halliford Road, Shepperton

The assessment states “The site is moderately performing Green Belt at stage 2 but is important to the wider strategic Green Belt. The site plays a fundamental role with respect to the wider Green Belt. Release would result in partially weaker boundaries.”. As outlined in our Preferred Options representations (see below), we do not agree with this assessment and continue to do so.

The Site has a very strong rear defensible boundary and even the Council considers the site “largely part of the urban area”. We contend that its contribution to the Green Belt purposes is minimal and its release would not result in weaker boundaries because of the strong tree lined boundary to the rear.

As referred to above (in Stage 2aa), for consistency, we repeat the comments submitted to the Preferred Options which responded to the conclusions made by the Council in the Green Belt – Stage 2 Assessment (‘GBA2’) (December 2018)). To note, updates to the NPPF have been made where necessary. Having reviewed the Plan’s evidence base and whilst we agree there are ‘exceptional circumstances’<sup>1</sup> to justify amendments to Green Belt boundaries and support the principle of the finer grain Green Belt Assessment - Stage 2, it is clear the Council has taken a far too broad-brush approach to the identification of sub-areas and the guidance in the NPPF (paragraph 143(f)) about the use of physical features to define Green Belt boundaries.

As shown below, the Site is enclosed on three sides by strongly established and man-made features with its southern boundary identified by one of the ‘additional boundary features,’<sup>1</sup> an ‘established and unbroken hedgerow’.



As a consequence, the Council has omitted a self-contained Site which should have been assessed independently as a sub-area. In light of our findings, we have assessed the Site in accordance with the criteria as set out in the Assessment and comment as follows:

(1) To check the unrestricted sprawl of large built-up areas

Whilst not at the edge of a large built area as defined by Table 3.31 in GBA2, reference is made in the Officer's Assessment to the surrounding built form/surrounding character which 'offers limited tranquillity or a feeling of remoteness and is largely part of the urban area associated with Upper Halliford'1 . Given the Site is at the most northern edge of the wider sub-area (32-k) (as shown below) and the strong relationship with urban form on three of the four sides, we suggest reference should have been made to this as part of the Assessment of sub-area 32-k.

Notwithstanding the above, given the development of the Site would constitute 'infill' development and would be entirely consistent with the approach to ribbon development along Halliford Road (as shown below), we suggest it is clear its release would not lead to the unrestricted sprawl of Upper Halliford.

Despite the surrounding built form and strong boundaries, the Site is not 'Not at the Edge' of a large built-up area, thus, would score '0' in respect of criteria (1b).

(2) To prevent neighbouring towns merging into one another The Site is enclosed by built form to the east and west together with Halliford Road and further built form (residential) to the north. Given the strong and established southern hedgerow boundary which could be enhanced through additional planting, it is clear its release would not result in merging with neighbouring towns. In accordance with Purpose 2 Assessment Criteria (Table 3.6 of GBA2), the Site does not provide a gap between any settlements and makes no discernible contribution to separation. The Site would score '0'.

(3) To assist in safeguarding the countryside from encroachment.

The Site is in a semi-urban area/is semi-urban in character area and its development would not encroach into the countryside. In accordance with Purpose 3 Assessment Criteria (Table 3.7 of GBA2) as the Site contains less than 15% built form and/or possesses a semi-urban character, the Site would score '2'.

(4) To preserve the setting and special character of historic towns.

The Site does not abut an identified historic settlement. We agree with the Score of '0'.

(4b and 4c) Assessment of Impacts on the Wider Green Belt / Consideration of Boundaries.

It is clear and demonstrated that the Site's development would not lead to the unrestricted sprawl of Upper Halliford or the merging with neighbouring towns. Further, given the established and unbroken hedgerow on the southern boundary, the surrounding built form and as concluded in the Officer's Assessment of the Site, the limited tranquillity due to the Site being largely part of the urban area associated with Upper Halliford, we suggest its release would not harm the performance of the wider strategic Green Belt and should be reassessed independently.

(5) Categorisation For the reasons set out above, we consider the Site does not meet the Purpose assessment criteria strongly and subsequently, does not make an important contribution to the wider strategic Green Belt. We therefore requested the Site be released from the Green Belt and these conclusions have not changed.

SITE SN1/008 – Land south of Perimeter Road, Stanwell

The commentary (in the Green Belt Assessment) states the Site performs a strong role against Green Belt purposes. As outlined in our Preferred Options representations (see below), we do not agree with this assessment and continue to do so. The Site is very well contained by the boundaries of the Southern Perimeter Road and Stanwell Moor Road which would provide strong permanent boundaries. As referred to above (in Stage 2aa), for consistency, we repeat the comments submitted to the Preferred Options which responded to the conclusions made by the Council in the Green Belt – Stage 2 Assessment ('GBA2') (December 2018)). To note, updates to the NPPF have been made where necessary. Within the Assessment, it was concluded the 4-b sub-area plays an important role with respect to the wider Green Belt Local Area and its release would harm the performance of the wider strategic Green Belt. In particular, it would harm the integrity of gaps between Ashford/Sunbury-on-Thames/Stanwell, Greater London and Stanwell Moor. We object to this conclusion and we have re-assessed the Site in accordance with the criteria of the Assessment.

(1) To check the unrestricted sprawl of large built-up areas We agree with the assessment that the Site is at 'the Edge' of Stanwell (one of the defined large built up areas).

(1b)

Whilst we agree with the assessment at 1a, we do not agree with the scoring at 1b. In accordance with Table 3.4 Purpose 1 Assessment Criteria, we consider the sub-area is connected to a large built-up area, however there are boundary features such as the Southern Perimeter Road to the north and indeed Heathrow which will restrict the scale of growth and regularise development form. Thus, the large built-up area is predominantly bordered by prominent and permanent boundary features, would not lead to unrestricted sprawl and should score '3' rather than '5+'.

(2) To prevent neighbouring towns merging into one another.

The conclusions of the Assessment suggest the release of the sub-area would reduce the distance between the settlements (Stanwell and Stanwell Moor) to such an extent that the settlements would, in effect, merge physically. Whilst we agree the sub-area provides to some degree a 'gap' function between the settlements, we disagree this is an 'essential gap' between non-Green Belt settlements, where development would significantly visually or physically reduce the perceived or actual distance between them' for the following reasons:

- The wooded area in the southern portion of the sub-area would prevent any development from extending far enough to merge with Stanwell;
- As set out in response to criteria 1, the presence of the Southern Perimeter Road which connects to Stanwell Moor Road to the west and the area of Green Belt land to the north west ensure a clear and defined separation between the two settlements will remain;
- The presence of the Southern Perimeter Road and Stanwell Moor Road (Permanent Man-made feature) provide the perceived physical barrier of separation; and
- As concluded in the Assessment, 'the enclosed nature of the site play some role in maintaining visual separation' and notwithstanding earlier analysis with regards the physical barriers that ensure separation, we consider with careful design, the Site could be developed in such a way that ensures the visual and physical separation remains.

We therefore consider the Site should score '3' in accordance with Table 3.6 Purpose 2 Assessment Criterion.

(3) To assist in safeguarding the countryside from encroachment.

Whilst we agree with the score of '2', we do want to highlight that part of the sub-area is currently in use as a quarry and therefore the land is not currently in a 'countryside' use. Further, and as confirmed in the Assessment, 'there is a strong sense of enclosure, with a lack of visual links to the wider countryside and the overall sense of rurality is further diminished by urbanising influences'<sup>1</sup> such as built form on-site and proximity of permanent man-made features such as Halliford Road / Stanwell Moor Road and major built form of Heathrow Airport to the north. We therefore consider it is clear the sub-area displays the characters of an urban location more so than 'semi-urban'.

(4) To preserve the setting and special character of historic towns.

The sub-area does not abut an identified historic settlement. We agree with the Score of '0'.

(4b and 4c) Assessment of Impacts on the Wider Green Belt / Consideration of Boundaries.

It is clear and demonstrated that the sub-area's development would not lead to the unrestricted sprawl of Stanwell or result in merging with Stanwell Moor. Further, given the presence of B-roads and the proximity of Heathrow, there is limited tranquillity due to the surrounding urban character and we suggest its release would not harm the performance of the wider strategic Green Belt. Indeed, the Council in their assessment of the sub-area goes onto suggest the presence of boundaries which are recognisable and defensible (as listed above) would 'result in the designation of stronger Green Belt boundaries compared to the existing inner Green Belt boundaries'. <sup>1</sup> We agree with this conclusion and suggest the sub-area should be re-assessed.

(5) Categorisation

For the reasons set out above, we disagree with the current Categorisation and consider the sub-area does not meet the Purpose assessment criteria strongly and subsequently, does not make an important contribution to the wider strategic Green Belt. We therefore suggest the sub-area be recommended for release.

FURTHERMORE:

The Local Plan proposes to release just 0.7 ha of Green Belt with a brownfield first strategy the focus. As evidenced elsewhere, brownfield sites often involve long lead in times owing to site-specific delivery constraints, for instance, costs associated with remediation/difficulties with design. Consequently, this can impact the viability of development affecting the delivery of affordable housing. To the contrary, the delivery of homes on Green Belt sites allows for family homes to be delivered with policy compliant levels of affordable housing – noting there is a need as confirmed in the Strategic Housing Market Assessment ('SHMA') of the Borough requiring 459 affordable homes per year<sup>1</sup>. Not only will this approach therefore meet the need of local communities, but with "a significant need for affordable housing"<sup>1</sup> in the Borough (with only 177 completed 2020-2021)<sup>1</sup>, it is clear that the only way this will be delivered is through additional Green Belt land being released and allocated for residential development.

Furthermore, and as supported by the HBF, "the issue of housing needs and affordability alone are sufficient to justify further amendments to the Green Belt boundary"<sup>1</sup>. In consideration that housing is a strategic policy matter and in accordance with paragraph 140 of the NPPF and strategic policies "establishing the need for any changes to Green Belt boundaries", it is evident, there are the exceptional circumstances for further release.

Please see attached document for related matters, maps and tables.

**Question 6:** You can upload any modifications below.

Cemex - Redacted Pre-Submission Local Plan Representations\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618877/PDF/->

[/Cemex%20%2D%20Redacted%20Pre%2DSubmission%20Local%20Plan%20Representations%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618877/PDF/-/Cemex%20%2D%20Redacted%20Pre%2DSubmission%20Local%20Plan%20Representations%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Yes, I wish to participate in hearing session(s)

To confirm that Exceptional Circumstances exist to justify the release of additional Green Belt land for residential and industrial development and that the Council's Green Belt Assessment of sites HS1/005 – Land adjacent to Squires Garden Centre, Halliford Road, Shepperton (for residential) and SN1/008 – Land south of Perimeter Road, Stanwell (for industrial/commercial uses) are incorrect and that both sites should be released from the Green Belt and allocated for development.

Please see enclosed letter that provides the composite response.(attached)

<b>Respondent: Sunita Chambore (41768449)</b>
<b>Organisation:</b>

<b>Response ID: 1124240</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
I am writing to object to building on the Running Horse green belt. Further housing is totally out of character for this quiet area. Parking is already an issue on Kinross Drive. We don't need any more residential properties in this area. We moved here for the peace and quiet and any substantial building work would greatly impair our quality of life.
<b>Question 6: You can upload any modifications below.</b>
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Councillor Rose Chandler (19532001)</b>
<b>Organisation: Spelthorne BC Councillor</b>

<b>Response ID: 1117441</b>
<b>Policy / Evidence Base / Part of Plan: Policy E5: Open Space and Recreation</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Submissions attached for: <ul style="list-style-type: none"> <li>• Convent Road</li> <li>• Muncaster Close</li> <li>• Chatten Road</li> <li>• Clockhouse Lane</li> <li>• Clockhouse Roundabout</li> <li>• Feltham Hill Road</li> <li>• Fernhurst Road</li> </ul>

Please find the attached detailed submissions for Local Green Spaces, each submission contains location map, photo, reason and contact details. These locations are critical to be protected, and are highly valued by local residents. I would also like to take the opportunity to thank you for all your hard work on the local plan, this is appreciated by the residents of Spelthorne.

**Question 6:** You can upload any modifications below.

LGS AshE Clockhouse Lane 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619765/PDF/-/LGS%20AshE%20Clockhouse%20Lane%202209p%5FRedacted%2Epdf>

LDF Convent Road AshE 2209x\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619766/PDF/-/LDF%20Convent%20Road%20AshE%202209x%5FRedacted%2Epdf>

LGS AshE Fernhurst Road 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619767/PDF/-/LGS%20AshE%20Fernhurst%20Road%202209p%5FRedacted%2Epdf>

LGS AshE Clockhouse Roundabout 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619768/PDF/-/LGS%20AshE%20Clockhouse%20Roundabout%202209p%5FRedacted%2Epdf>

LGS AshE Muncaster Close 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619769/PDF/-/LGS%20AshE%20Muncaster%20Close%202209p%5FRedacted%2Epdf>

LGS AshE Chatten Rd 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619770/PDF/-/LGS%20AshE%20Chatten%20Rd%202209p%5FRedacted%2Epdf>

LDF Manor Road AshE 2209x\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619771/PDF/-/LDF%20Manor%20Road%20AshE%202209x%5FRedacted%2Epdf>

LGS AshE Feltham Hill Road 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619772/PDF/-/LGS%20AshE%20Feltham%20Hill%20Road%202209p%5FRedacted%2Epdf>



**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Charles Morris (42351713)</b>
<b>Organisation:</b> Charles Morris Management Limited

<b>Response ID:</b> 1128154
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
<p>Background</p> <p>Oakleaf Farm Resource and Recovery Centre is situated in the Green Belt just south of Heathrow Airport, on a site comprising 11.2 hectares in total. Planning permission was granted in November 2009 for waste recycling and recovery. This permission followed on from the allocation in the Surrey Waste Local Plan 2008 of the site as one suitable for waste management uses. Drawing 1163/61 showing the permitted area is attached, together with an aerial photograph. The area of the 2009 permission extends is some 9.4 hectares, including a substantial bund which largely encircles the operational area.</p> <p>The Surrey Waste Local Plan adopted in December 2020 (“the SWLP”) identifies, under policy 11a, an area of 6.8 hectares within the area of the original permission, but not yet occupied by permanent development, as being suitable for a full range of potential waste management facilities and a significant increase in capacity. While only the area within the bund is identified as available land, the indicative red line boundary of the allocation includes the land occupied by the bund itself and adjoining land outside. Paragraph 5.3.3.4 of the SWLP states that the sites proposed for allocation within the Green Belt</p>

are primarily comprised of land that has been subject to previous development or use. This applies to Oakleaf Farm which is not subject to a requirement for restoration, and this is acknowledged in Policy 11a B iii).

Policy 10 of the SWLP sets out a hierarchy of areas suitable for waste development facilities and sets out five categories of location i) - v), which do not include the sites in the Green Belt allocated under Policy 11a. These are referred to in the final paragraph of Policy 10 where it is stated that planning permission will be granted on sites allocated under Policy 11 a within the Green Belt where it can be shown that the need cannot be met at any of the locations described in i) - v), and where the proposal is consistent with other policies of the SWLP, including Policy 9 concerning Green Belt.

There is a further relevant paragraph in the SWLP at 5.3.3.9 which explains that sites allocated for waste management in the Green Belt have been through a process of alternative site assessment. Having demonstrated exceptional circumstances to justify the allocation of strategic sites in the Green Belt, it is stated that the County Council will encourage LP As to consider making appropriate alterations to the Green Belt's boundaries as their local plans are reviewed. Paragraph 5.3.3.10 goes on to say that, in the absence of changes to the boundaries of the Green Belt, all planning applications for inappropriate waste related development on allocated sites within the Green Belt will need to demonstrate very special circumstances, which could include the fact that the allocation of the site was deemed acceptable under the terms of the SWLP itself.

#### The Case for the removal of the Site from the Green Belt

The SWLP at paragraph 5.3.3.9 expresses the intention of the County Council to encourage LPAs to make appropriate alterations to their Green Belt boundaries as their local plans are reviewed. To do this would clearly be consistent with the intentions of the SWLP and improve significantly the ability to deliver and meet the county's need for waste management facilities. The SWLP states that the site has further capacity to accommodate a full range of waste disposal facilities and a significant increase in capacity (See SWLP Part 2-Sites: Oakleaf Farm 5.4 P.64). The Green Belt notation is a hindrance to achieving this aim and the site will continue to be at the bottom of the hierarchy in Policy 11a.

Despite representations made to the first two consultations in the Local Plan process there has been no indication from the LP A that it is willing to consider an alteration to the Green Belt boundary to exclude Oakleaf Farm. As the plan is currently drafted changes to the Green Belt boundary will only be made where the land released is required to meet identified housing need. There is no consideration at present of taking this opportunity to deal with an inconsistency between the SLP and the SWLP, namely the existence of a permanent waste recycling and recovery facility within the Green Belt and its allocation for future expansion on a large scale. Although at present only a part of the site is occupied by permanent buildings, the developed area will increase if the site is developed in accordance with the aims of the SWLP 2020 further industrialising the character and appearance of the site. This change is likely further to weaken the function of this area in achieving the purposes of the Green Belt which is currently assessed as moderate in relation to Purpose 2, but more minor in relation to Purpose 3 (Stage 2 Green Belt Assessment in relation to Sub-Area 2a-g. Step 4B: Assessment of Wider Impact).

The LPA has already accepted that the site's Green Belt role is compromised, as, in evidence to the Surrey Waste Plan Local Plan Inquiry in September 2019, the Council acknowledged that the use of the site for waste development had been accepted in principle, and that development on the site did have an impact on the openness of the Green Belt.

11 . The LPAs Stage 2 Assessment of the Green Belt considered the Oakleaf Farm site itself (2a-g), together with the land immediately to the west (2a-c ), and the land to the east on the far side of Stanwell Moor Road, which is a dual carriageway ( 4-b ).

The assessment acknowledged that the Oakleaf Farm site (2a-g) had a semi-urban character and that the sense of rurality was diminished by the land uses on the site and the lack of visual links to the wider countryside. However, the conclusion was reached that the site performed moderately in relation to purposes 2 and 3 and played a moderately important role with respect to the wider Green Belt although this role appears to rely heavily on the perceived function of the land to the east on the other side of Stan well Moor Road. (4b). In terms of boundaries the report concludes that if Oakleaf Farm and the land to the west were to be released, the designation of a stronger, defensible Green Belt boundary would result (Stage 2 Green Belt Assessment in relation to Sub-Area 2a-g: Step 4C: Consideration of Boundaries. Page 33).

The section of the report relating to the land to the east (4b) states in relation to the boundaries of the area that ‘The outer boundaries of the sub-area are predominantly recognisable and defensible, comprising ... Stanwell Moor Road to the east ‘. If Oakleaf Farm were to be removed from the Green Belt, Stanwell Moor Road would thus form a good, defensible, and recognisable western boundary of the Green Belt in this area. Stanwell Moor Road, because of its width and character as a main highway forms a strong dividing line between Oakleaf Farm and Sub Area (4b) to the east.

The Stage 2 Green Belt Assessment does not establish that the site performs any Green Belt function of substance and cannot therefore strengthen the boundary, since its impact in terms of inappropriate development and the lack of Green Belt purposes runs counter to Green Belt considerations. Nor does the Assessment take account of the fact that, because of its allocation in the SWLP, the character of the site will become increasingly urban/industrial in any event. This is a case where the exceptional circumstances suggested in the NPPF 136-139 are met, since;

- a) the site is permitted for necessary non-Green Belt development and is allocated as such with scope for increased capacity in the SWLP.
- b) it appears to be common ground that the site in its current state detracts from the openness of the Green Belt.
- c) Paragraph 139 of the NPPF supports new boundaries where they would be consistent with meeting identified needs for sustainable development. The development/allocation is for sustainable waste development, and there is a need to retain scope for enlargement as recognized in the SCC plan (i.e. longer term development needs). To remove it from the Green Belt would allow the creation of boundaries that would be more likely to endure in the longer term in accordance with the NPPF which makes it quite clear that Green Belt boundaries should not need to be altered again at the end of the plan period. To continue to restrict the site for the duration of the Plan period, as now proposed, would not take account of the need to deal sustainably with waste and would put the currently proposed Green Belt boundary under pressure in the short to medium term. In a sense, this is a release which ought to have taken place before the site was allocated and permitted, but certainly to retain it in the Green Belt now would not be reasonable or sound planning.
- d) The boundaries can be defined clearly, using physical features that are readily identifiable and likely to be permanent in accordance with NPPF 139 f). To continue to retain this site in the Green Belt renders the Plan unsound as it is inconsistent with the aims and requirements of the SWLP. That inconsistency renders the Plan ineffective, in that its provisions hinder the achievement of the critical waste functions of the SWLP. It also renders it unjustified: there is no sense in retaining in the Green Belt an area of land for which VSC for development already exist by virtue of another part of the

statutory development plan. In drawing up the SWLP the County Council was faced with no option other than to include sites in the Green Belt, recognizing at the same time that the situation was not ideal, hence the various provisions relating to the circumstances in which permissions might be granted on such sites, and the acknowledgement that the very fact a site had been allocated could constitute very special circumstances. It is not within the remit of the County Council to bring about changes in the boundary of the Green Belt. That is for the LPA and this is a circumstance where the LPA should take the opportunity to make the SLP consistent with the SWLP, especially where doing so will in fact enhance the medium to long-term defensibility and legibility of the Green Belt boundaries in the area.  
See attached document for related sites.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

Ashton, Janet [CPG] -on behalf of Charles Morris Management - sites.pdf

[https://spelthorne.inconsult.uk/gf2.ti/af/1409506/726890/PDF/-/Ashton\\_%20Janet\\_Redacted\\_CPG%20-on%20behalf%20of%20Charles%20Morris%20Management.pdf](https://spelthorne.inconsult.uk/gf2.ti/af/1409506/726890/PDF/-/Ashton_%20Janet_Redacted_CPG%20-on%20behalf%20of%20Charles%20Morris%20Management.pdf)

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: In order for situation regarding the retention of Oakleaf Farm, an existing waste recycling and recovery facility, and allocated in the Surrey Waste Local Plan, within the Green Belt to be properly explored in relation to it's likely further development and increase in capacity.

<b>Respondent: Charles Morris (42351713)</b>
<b>Organisation: Charles Morris Management Limited</b>

<b>Response ID: 1128156</b>
<b>Policy / Evidence Base / Part of Plan: Policy PS1: Responding to the climate emergency</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
<p>Background</p> <p>1. Oakleaf Farm Resource and Recovery Centre is situated in the Green Belt just south of Heathrow Airport, on a site comprising 11.2 hectares in total. Planning permission was granted in November 2009 for waste recycling and recovery. This permission followed on from the allocation in the Surrey Waste Local Plan 2008 of the site as one suitable for waste management uses. Drawing 1163/61 showing the permitted area is attached, together with an aerial photograph. The area of the 2009 permission extends is some 9.4 hectares, including a substantial bund which largely encircles the operational area.</p> <p>3. The Surrey Waste Local Plan adopted in December 2020 (“the SWLP”) identifies, under policy 11a, an area of 6.8 hectares within the area of the original permission, but not yet occupied by permanent development, as being suitable for a full range of potential waste management facilities and a significant increase in capacity. While only the area within the bund is identified as available land, the indicative red line boundary of the allocation includes the land occupied by the bund itself and adjoining land outside. Paragraph 5.3.3.4 of the SWLP states that the sites proposed for allocation within the Green Belt</p>

are primarily comprised of land that has been subject to previous development or use. This applies to Oakleaf Farm which is not subject to a requirement for restoration, and this is acknowledged in Policy 11a B iii).

5. Policy 10 of the SWLP sets out a hierarchy of areas suitable for waste development facilities and sets out five categories of location i) - v), which do not include the sites in the Green Belt allocated under Policy 11a. These are referred to in the final paragraph of Policy 10 where it is stated that planning permission will be granted on sites allocated under Policy 11 a within the Green Belt where it can be shown that the need cannot be met at any of the locations described in i) - v), and where the proposal is consistent with other policies of the SWLP, including Policy 9 concerning Green Belt.

6. There is a further relevant paragraph in the SWLP at 5.3.3.9 which explains that sites allocated for waste management in the Green Belt have been through a process of alternative site assessment. Having demonstrated exceptional circumstances to justify the allocation of strategic sites in the Green Belt, it is stated that the County Council will encourage LP As to consider making appropriate alterations to the Green Belt's boundaries as their local plans are reviewed. Paragraph 5 .3 .10 goes on to say that, in the absence of changes to the boundaries of the Green Belt, all planning applications for inappropriate waste related development on allocated sites within the Green Belt will need to demonstrate very special circumstances, which could include the fact that the allocation of the site was deemed acceptable under the terms of the SWLP itself.

#### The Case for the removal of the Site from the Green Belt

The SWLP at paragraph 5.3.3.9 expresses the intention of the County Council to encourage LPAs to make appropriate alterations to their Green Belt boundaries as their local plans are reviewed. To do this would clearly be consistent with the intentions of the SWLP and improve significantly the ability to deliver and meet the county's need for waste management facilities. The SWLP states that the site has further capacity to accommodate a full range of waste disposal facilities and a significant increase in capacity (See SWLP Part 2-Sites: Oakleaf Farm 5.4 P.64). The Green Belt notation is a hindrance to achieving this aim and the site will continue to be at the bottom of the hierarchy in Policy 11a.

9. Despite representations made to the first two consultations in the Local Plan process there has been no indication from the LP A that it is willing to consider an alteration to the Green Belt boundary to exclude Oakleaf Farm. As the plan is currently drafted changes to the Green Belt boundary will only be made where the land released is required to meet identified housing need. There is no consideration at present of taking this opportunity to deal with an inconsistency between the SLP and the SWLP, namely the existence of a permanent waste recycling and recovery facility within the Green Belt and its allocation for future expansion on a large scale. Although at present only a part of the site is occupied by permanent buildings, the developed area will increase if the site is developed in accordance with the aims of the SWLP 2020 further industrialising the character and appearance of the site. This change is likely further to weaken the function of this area in achieving the purposes of the Green Belt which is currently assessed as moderate in relation to Purpose 2, but more minor in relation to Purpose 3 (Stage 2 Green Belt Assessment in relation to Sub-Area 2a-g. Step 4B: Assessment of Wider Impact).

10. The LPA has already accepted that the site's Green Belt role is compromised, as, in evidence to the Surrey Waste Plan Local Plan Inquiry in September 2019, the Council acknowledged that the use of the site for waste development had been accepted in principle, and that development on the site did have an impact on the openness of the Green Belt.

11. The LPAs Stage 2 Assessment of the Green Belt considered the Oakleaf Farm site itself (2a-g), together with the land immediately to the west (2a-c), and the land to the east on the far side of Stanwell Moor Road, which is a dual carriageway (4-b).

12. The assessment acknowledged that the Oakleaf Farm site (2a-g) had a semi-urban character and that the sense of rurality was diminished by the land uses on the site and the lack of visual links to the wider countryside. However, the conclusion was reached that the site performed moderately in relation to purposes 2 and 3 and played a moderately important role with respect to the wider Green Belt although this role appears to rely heavily on the perceived function of the land to the east on the other side of Stanwell Moor Road. (4b). In terms of boundaries the report concludes that if Oakleaf Farm and the land to the west were to be released, the designation of a stronger, defensible Green Belt boundary would result (Stage 2 Green Belt Assessment in relation to Sub-Area 2a-g: Step 4C: Consideration of Boundaries. Page 33).

13. The section of the report relating to the land to the east (4b) states in relation to the boundaries of the area that 'The outer boundaries of the sub-area are predominantly recognisable and defensible, comprising ... Stanwell Moor Road to the east'. If Oakleaf Farm were to be removed from the Green Belt, Stanwell Moor Road would thus form a good, defensible, and recognisable western boundary of the Green Belt in this area. Stanwell Moor Road, because of its width and character as a main highway forms a strong dividing line between Oakleaf Farm and Sub Area (4b) to the east.

14. The Stage 2 Green Belt Assessment does not establish that the site performs any Green Belt function of substance and cannot therefore strengthen the boundary, since its impact in terms of inappropriate development and the lack of Green Belt purposes runs counter to Green Belt considerations. Nor does the Assessment take account of the fact that, because of its allocation in the SWLP, the character of the site will become increasingly urban/industrial in any event. This is a case where the exceptional circumstances suggested in the NPPF 136-139 are met, since;

- a) the site is permitted for necessary non-Green Belt development and is allocated as such with scope for increased capacity in the SWLP.
- b) it appears to be common ground that the site in its current state detracts from the openness of the Green Belt.
- c) Paragraph 139 of the NPPF supports new boundaries where they would be consistent with meeting identified needs for sustainable development. The development/allocation is for sustainable waste development, and there is a need to retain scope for enlargement as recognized in the SCC plan (i.e. longer term development needs). To remove it from the Green Belt would allow the creation of boundaries that would be more likely to endure in the longer term in accordance with the NPPF which makes it quite clear that Green Belt boundaries should not need to be altered again at the end of the plan period. To continue to restrict the site for the duration of the Plan period, as now proposed, would not take account of the need to deal sustainably with waste and would put the currently proposed Green Belt boundary under pressure in the short to medium term. In a sense, this is a release which ought to have taken place before the site was allocated and permitted, but certainly to retain it in the Green Belt now would not be reasonable or sound planning.
- d) The boundaries can be defined clearly, using physical features that are readily identifiable and likely to be permanent in accordance with NPPF 139 f).

16. To continue to retain this site in the Green Belt renders the Plan unsound as it is inconsistent with the aims and requirements of the SWLP. That inconsistency renders the Plan ineffective, in that its provisions hinder the achievement of the critical waste functions of the SWLP. It also renders it unjustified: there is no sense in retaining in the Green Belt an area of land for which VSC for development already exist by virtue of another part of the



statutory development plan. In drawing up the SWLP the County Council was faced with no option other than to include sites in the Green Belt, recognizing at the same time that the situation was not ideal, hence the various provisions relating to the circumstances in which permissions might be granted on such sites, and the acknowledgement that the very fact a site had been allocated could constitute very special circumstances. It is not within the remit of the County Council to bring about changes in the boundary of the Green Belt. That is for the LPA and this is a circumstance where the LPA should take the opportunity to make the SLP consistent with the SWLP, especially where doing so will in fact enhance the medium to long-term defensibility and legibility of the Green Belt boundaries in the area.  
See attached document for related sites.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

Ashton, Janet [CPG] -on behalf of Charles Morris Management - sites.pdf

[https://spelthorne.inconsult.uk/gf2.ti/af/1409506/726890/PDF/-/Ashton\\_%20Janet\\_Redacted\\_CPG%20-on%20behalf%20of%20Charles%20Morris%20Management.pdf](https://spelthorne.inconsult.uk/gf2.ti/af/1409506/726890/PDF/-/Ashton_%20Janet_Redacted_CPG%20-on%20behalf%20of%20Charles%20Morris%20Management.pdf)

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: In order for situation regarding the retention of Oakleaf Farm, an existing waste recycling and recovery facility, and allocated in the Surrey Waste Local Plan, within the Green Belt to be properly explored in relation to it's likely further development and increase in capacity.

<b>Respondent: Miss Zoe Chick (41555105)</b>
<b>Organisation: River Thames Scheme</b>

<b>Response ID: 1120455</b>
<b>Policy / Evidence Base / Part of Plan: Key diagram</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Section 2. The Route to 2037 'Spelthorne in 2022' – Maps 1 - Key Diagram: We are pleased to see the RTS represented on the Key Diagram. However, the extent of the RTS shown in this figure is not reflective of the current proposals. The RTS would like this diagram to represent the latest indicative RTS boundary. Recommended action: Key Diagram to be updated with the indicative RTS boundary, which will be supplied to Spelthorne Borough Council separately. The RTS will continue the established dialogue with the Council to ensure the latest boundary is available. 'Our Destination and Objectives' Tackling climate change (Supporting text paragraph 2.15): The Draft Plan recognises that climate change could have an impact on the Borough. With the Borough declaring a climate emergency, the council realise that there is a need to work with residents and businesses to achieve cleaner and greener lifestyles. The second bullet point of this paragraph states:

• 'Working with the Environment Agency and through the Strategic Flood Risk Assessment, ensure that new development is directed to areas of lowest flood risk. Incorporating the River Thames (Flood Relief) Scheme and other flood mitigation initiatives withing the Plan'  
We support this statement, however suggest reference to the 'River Thames (Flood Relief) Scheme' is replaced with the 'River Thames Scheme' so that it is consistent with our project name, the Scheme's wider scope, and how the project is referenced in other sections of the Draft Plan.  
Recommended action: Paragraph 2.15 should reflect the current name for the project. The text could be amended to:  
'Working with the Environment Agency and through the Strategic Flood Risk Assessment, ensure that new development is directed to areas of lowest flood risk. Incorporating the River Thames Scheme and other flood mitigation initiatives within the Plan'  
Please see attached document for full rep.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Miss Zoe Chick (41555105)</b>
<b>Organisation: River Thames Scheme</b>

<b>Response ID: 1127128</b>
<b>Policy / Evidence Base / Part of Plan: Evidence base - IDP</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Section 9. Infrastructure Delivery Supporting text paragraph 9.1 Given that flooding is a key issue in the Borough, it would be prudent to include flood infrastructure in paragraph 9.1 as it will be a key piece of infrastructure that will support a sustainable future for the Borough. Recommended action: Inclusion of reference to flood infrastructure in paragraph 9.1. The RTS is included in Chapter 13 – Flood Infrastructure, of the Infrastructure Delivery Plan (IDP). Some of the text in relation to the RTS in the IDP is now out of date, as it still refers to three channels. We would be happy to work with Spelthorne Borough Council to update the wording. Recommended action: RTS to provide the council with updated the wording to use in the IDP.

We hope that our comments are useful. We would welcome the opportunity to work with you to address our concerns so that you may strengthen the current policy wording and supporting text in the Draft Plan.  
Please see attached for full response.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Miss Zoe Chick (41555105)</b>	
<b>Organisation: River Thames Scheme</b>	
<b>Response ID: 1127165</b>	
<b>Policy / Evidence Base / Part of Plan: Policy SP1: Staines-upon-Thames</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Section 5. Spatial Policies Policy SP1: Staines-upon-Thames (Main Policy) Part 3 of this policy states the following: '3) Flood risk management infrastructure should be incorporated into proposals where appropriate. Current and expected flood risk from all sources should be managed in a sustainable and cost-effective way.' The RTS supports this element of Policy SP1. Recommended action: For information only, no action required.	
<b>Question 6: You can upload any modifications below.</b>	
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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Miss Zoe Chick (41555105)</b>
<b>Organisation: River Thames Scheme</b>

<b>Response ID: 1120457</b>
<b>Policy / Evidence Base / Part of Plan: Policy SP6: River Thames and its Tributaries</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Policy SP6: River Thames and its Tributaries (Main Policy and supporting text paragraph 5.31) The RTS is pleased to see support for the project in Policy SP6 (extract below): 'River Thames Scheme 8) The Council supports in principle the proposals for the wider River Thames Scheme and welcomes the proposed new footpath connection in Laleham as part of the recreational benefits the scheme will bring. The proposed route is shown on the Policies Map' We would suggest the above extract of the policy wording is amended to reflect the current aspirations of the scheme. To further strengthen the policy support for the RTS, we would like a statement supporting the scheme as an important piece of green and blue infrastructure that will promote healthier, more resilient, and more connected communities through reducing flood risk, providing access to new areas of open spaces and wildlife, and enhancing the sustainable travel network.



Recommended action: The extract could be amended to say:

8) The Council supports in principle the proposals for the wider River Thames Scheme and welcomes the new areas for recreation and wildlife and new active travel connections (including new foot and cycle paths) that the scheme will bring. The River Thames Scheme is a project designed to significantly reduce the risk of flooding by creating two new river channels totalling over 8.5 miles alongside the Thames in Runnymede and Spelthorne, as well as increasing capacity at Sunbury, Molesey and Teddington weirs. These new channels will increase the capacity of the Thames through Surrey and south west London, reducing the risk of flooding to over 11,000 homes and 1,600 businesses. The proposed indicative route is shown on the Policies Map' We would like to point out that the RTS is currently only shown on the interactive version of the Policies Map. However, the boundary of the RTS on the interactive Policies Map needs updating.

In terms of the non-interactive Policies Map, the RTS is currently not shown on it and we would like it to present the latest indicative RTS boundary.

Recommended action: Policies Map (both interactive and non-interactive) to be updated with the latest indicative RTS boundary, which will be supplied to Spelthorne Borough Council separately.

In terms of supporting text paragraph 5.31, this could be amended to go into more detail about what the RTS would provide. Paragraph 5.31 currently reads:

'These measures will better protect around 11,000 homes (in total not just in Spelthorne) and 1,600 businesses, enhance the natural environment around the river, and boost the local economy.'

Recommended action: Paragraph 5.31 could be replaced with the following:

'Like other boroughs, Spelthorne needs to ensure it is able to plan development that responds to the climate emergency. One of the biggest risks to the borough is flooding from the River Thames and this risk will only grow with climate change. The section of the River Thames that runs through the borough makes up one of the largest areas of un-defended flood plain in England. The RTS is a project designed to significantly reduce the risk of flooding by creating two new river channels totalling over 8.5 miles alongside the Thames in Runnymede and Spelthorne, as well as increasing capacity at Sunbury, Molesey and Teddington weirs. These new channels will increase the capacity of the Thames through Surrey and south west London, reducing the risk of flooding to over 11,000 homes and 1,600 businesses. Alongside the channels there will be large areas of green open space, new foot and cycle paths, and habitat creation. The flood channels will also provide opportunities for fishing, boating and canoeing bringing health benefits to communities as well as opportunities for tourism, recreation and leisure.

Policy SP6: River Thames and its Tributaries (Main Policy)

Part 2 of this policy states:

'2) The Council supports opportunities to increase the use of the rivers for tourism and improving river-based and riverside recreation and leisure activities. All development proposals should protect and enhance the river and its setting as a valuable resource for biodiversity, wildlife and as an SNCI. Where possible and where there will be no adverse effect on the SNCI, development proposals should support infrastructure such as boatyards, moorings, jetties and safety equipment etc.

Policy SP6: River Thames and its Tributaries (Supporting text paragraphs 5.29, 5.30, 5.32, 5.33 and 5.34)

The RTS supports the council's statement in paragraph 5.29 which states that 'Existing riverside access will be maintained and opportunities will be sought to improve access in conjunction with developments in riverside locations.'

Recommended action: For information only, no action required. We are pleased to see the inclusion of information on the benefits the RTS will bring and its key elements in paragraph 5.30. We request inclusion of Surrey County Council as a delivery partner in this paragraph.

To be in keeping with how the project defines the scheme and other sections of the Draft Plan, we would like to see inclusion of other environmental and community benefits the RTS would bring in the main text and bullet points.

Recommended action: To reflect the statements above, paragraph 5.30 could be amended to:

A significant area of Spelthorne lies in the floodplains of the Thames, Colne (and related river system) and Ash. Flood defences are very limited and are on parts of the River Colne system and the River Ash. The River Thames between Egham and Teddington is one of the largest area of undefended, developed floodplain in England. Spelthorne Borough Council is working with the Environment Agency, Surrey County Council and other partners to bring forward the River Thames Scheme which seeks to address this with the aim of reducing flood risk in communities by providing additional channel capacity and improved conveyance. Alongside the channels there will be large areas of green open space, new foot and cycle paths, and improved wildlife habitats. The flood channels will also provide opportunities for fishing, boating and canoeing bringing health benefits to communities as well as opportunities for tourism, recreation and leisure. The key elements are:

- proposed new river channel built in two sections – at Runnymede and at Spelthorne – to increase storage capacity for water from a major flood;
- improvements to existing river structures (Sunbury, Molesey and Teddington weirs);
- large areas of green open space, improved wildlife habitats and opportunities for tourism, recreation and leisure; and
- new and enhanced active travel routes for walking and cycling.

Paragraph 5.32 states:

'The Spelthorne channel is 3.2km in length. It starts at Laleham and ends at Weybridge. The channel flows through four lakes and crosses five roads. This area includes increasing capacity on stretch of the Desborough Cut. At Sunbury weir there will be three extra gates built on the lock island.'

We suggest adding the word 'proposed' before Spelthorne, given the channel has not yet been built. In addition, the capacity improvements reference in this paragraph are downstream of Desborough Cut and we propose this paragraph is also amended to reflect this fact.

The design of Sunbury weir is still under review and as such, the number of gates could change. To reflect this, we propose amending the text to say 'there will be extra gates built...' rather than specifying 3 gates.

Recommended action: To amend paragraph 5.32 with the proposed changes referenced above:

'The proposed Spelthorne channel is 3.2km in length. It starts at Laleham and ends at Weybridge. The channel flows through four lakes and crosses five roads. The proposals include increasing the capacity downstream of the Desborough Cut. At Sunbury weir there will be extra gates built on the lock island.'

Paragraph 5.33 states:

'The large scale of the project means it is treated as a Nationally Significant Infrastructure Project (NSIP) and requires a type of consent known as 'development consent order' (DCO). The DCO must be granted before full funding is approved and construction can begin.'

We propose amending the first sentence, as a DCO has not yet been submitted.

Recommended action: To amend paragraph 5.33 in the following way: 'The large scale of the project means it is to be treated as a Nationally Significant Infrastructure Project (NSIP) and requires a type of consent known as 'development consent order' (DCO). The DCO must be granted before full funding is approved and construction can begin.'

The RTS welcomes support from the council that Flood Risk Assessments for developments along the River Thames should consider how the RTS may be impacted, as outlined in paragraph 5.34.

Recommended action: For information only, no action required.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Miss Zoe Chick (41555105)</b>
<b>Organisation: River Thames Scheme</b>

<b>Response ID: 1120468</b>
<b>Policy / Evidence Base / Part of Plan: Policy E1: Green and Blue Infrastructure</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Section 7. Environment Policy E1: Green and Blue Infrastructure (Main Policy and supporting text paragraph 7.7) We are pleased to see that the value of green and blue infrastructure is recognised and is included as a separate policy. As part of the RTS, we will be creating new blue and green infrastructure to provide wider benefits and enhancements to the environment and local communities. The RTS would like to see 'flood risk management' included as one of the values blue infrastructure provides to the Borough to part 3 of Policy E1 and to paragraph 7.7. Recommended action: To reflect the proposition above the text could be amended to: Part 3 of Policy E1:

'Where development is located on or adjacent to a watercourse or reservoir proposals must contribute towards the delivery of a high quality multi-functional blue infrastructure network through ensuring the protection and enhancement of the ecological, flood risk management, landscape and recreational value of that water body.'

Paragraph 7.7:

'Blue Infrastructure is the network of watercourses and other bodies of water including reservoirs, which provide ecological, flood risk management, landscape and recreational value to the Borough. This also includes the banks and corridors immediately along the watercourse which can provide significant biodiversity benefits and play a vital role in ensuring habitat connectivity.'

See attached for full response.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Miss Zoe Chick (41555105)</b>	
<b>Organisation: River Thames Scheme</b>	
<b>Response ID: 1120516</b>	
<b>Policy / Evidence Base / Part of Plan: Policy E2: Biodiversity</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Policy E2 is unsound because although it states that the Council seeks to maintain SNCI's and that they will only permit development proposals within these sites where there will be no adverse effect directly or indirectly on ecological interest, this fails to provide opportunities that may lead to enhancement and future protection of such sites. Given the relative significance of such sites and the fact that they are often not in the best condition for nature conservation purposes, reference should be made to opportunities whereby development benefits overcome harm and where relevant mitigation can be provided, where this is the case a balanced decision should be made. Currently points 3 and 4 conflict in this regard.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Rewording of point 3 to reflect opportunities in point 4 for developments affecting SNCI's to be considered against their benefits. See attached document for full response.	
<b>Question 6: You can upload any modifications below.</b>	

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Policy E2 as worded fails to provide opportunities for enhancement for SNCI's and this matter would benefit from discussion at the hearing sessions.

<b>Respondent: Miss Zoe Chick (41555105)</b>	
<b>Organisation: River Thames Scheme</b>	
<b>Response ID: 1119557</b>	
<b>Policy / Evidence Base / Part of Plan: Policy E3: Managing Flood Risk</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: The RTS does not consider, for the sections we have made representations on, that there is anything that is not legally compliant. We also consider these sections of the Draft Plan to be sound and compliant with the Duty to Co-operate.
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: The RTS does not consider, for the sections we have made representations on, that there is anything that is not legally compliant. We also consider these sections of the Draft Plan to be sound and compliant with the Duty to Co-operate.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: The RTS does not consider, for the sections we have made representations on, that there is anything that is not legally compliant. We also consider these sections of the Draft Plan to be sound and compliant with the Duty to Co-operate.
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Please find enclosed representations to the Pre-Submission Spelthorne Local Plan 2022-2037 (hereafter referred to as the 'Draft Plan') on behalf of the River Thames Scheme (RTS).	



Our detailed comments are provided below, following the general order of the topics presented in the Draft Plan. We note that the Representation Form requests consultees to answer the following questions:

1. Do you consider the Local Plan is legally compliant?
2. Do you consider the Local Plan is sound?
3. Do you consider the Local Plan complies with the Duty to Co-operate?

The RTS does not consider, for the sections we have made representations on, that there is anything that is not legally compliant. We also consider these sections of the Draft Plan to be sound and compliant with the Duty to Co-operate.

Where we wish to see policies strengthened, we have outlined the additional content we would like included in the form of recommendations that would benefit the RTS project. We have also referenced the relevant sections and policy numbers for ease of navigating our response.

#### RTS Background

Working in Partnership, the Environment Agency and Surrey County Council are together delivering The River Thames Scheme (RTS).

The RTS represents a new landscape-based approach to creating healthier, more resilient, and more sustainable communities. The RTS will be an integrated scheme which responds to the challenges of flooding; creating more access to green open spaces and sustainable travel routes, in addition to encouraging inclusive economic growth, increasing biodiversity and responding to the dual challenges of climate change and nature recovery.

A major new piece of blue and green infrastructure, each element of the RTS will work together to deliver benefits for communities. A new flood channel will reduce the risk of flooding to homes, businesses, and infrastructure, while also providing habitat for wildlife and a new feature in the landscape for recreation. The channel will be flanked by new areas of public green open space, for recreation and spending time with nature. New footpaths and cycleways will run along the channel and through the new public spaces, linking different elements of the scheme with communities and providing better connections within and across the area. Areas of new and improved habitat for wildlife and nature recovery will connect with existing nature sites and wildlife corridors to provide a new nature recovery network along the length of the channel that significantly supports biodiversity.

The River Thames between Egham and Teddington runs through the largest area of undefended flood plain in England. In addition to the towns and villages in this area, the landscape has been heavily shaped by major infrastructure and extensive mineral workings. This has resulted in an area in which many homes and businesses are at risk of flooding, within a landscape which suffers from visual barriers and physical constraints which means the open space isn't used to its full potential. The RTS will address these challenges to help create a sustainable, thriving and healthy community and promote inclusive economic growth. The Scheme will reduce the risk of flooding to thousands of homes, businesses and vital infrastructure; it will create new areas of green open spaces with recreational facilities and connections to wildlife and it will provide sustainable travel connections to link it all together and create an improved resource for communities to enjoy.

As an integrated Scheme, the RTS will deliver:

- A new river channel built in two sections – one section through Runnymede (between Egham Hythe and Chertsey) and one through Spelthorne (between Littleton North lake and the Desborough Cut)

- Capacity increases around the Desborough Cut and the weirs at Sunbury, Molesey and Teddington
- Improved access to quality green open space and connections with wildlife, in addition to supporting a more sustainable travel network
- A network of high-quality habitat to achieve a biodiversity net gain.

The large scale of the project means the government has directed it should be treated as a project of national significance. These projects require a type of consent known as a 'Development Consent Order' (DCO). The DCO process removes the need to obtain many separate consents, including planning permission and is designed to be a quicker process than applying for these separately.

Policy E3: Managing Flood Risk (Main Policy)

We are pleased to see support for the RTS in this policy. We suggest that additional text is added under part 10 of this policy that recognises the RTS as an important project providing flood resilience alongside biodiversity, public open space, and active travel improvements.

Recommended action: To incorporate text to part 10 of Policy E3 which provides further justification for RTS and what it will achieve. The following text could be added: '

10) The Council supports proposals for strategic flood relief measures, including the proposed flood channel through the Borough as part of the River Thames Scheme. The council is also supportive of the other elements of the River Thames Scheme, including the biodiversity, public open space, and active travel improvements it will bring. The proposed route of the channel and the land adjacent to it, as shown on the Policies Map will be safeguarded for this purpose.'

Please see attached document for in depth rep and related figures/maps.

**Question 6:** You can upload any modifications below.

RTS -Redacted RTS Letter Pre-Sub Spelthorne LP 2022-2037 - Surrey CC\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618710/PDF/->

[/RTS%20%2DRedacted%20RTS%20Letter%20Pre%2DSub%20Spelthorne%20LP%202022%2D2037%20%2D%20Surrey%20CC%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618710/PDF/-/RTS%20%2DRedacted%20RTS%20Letter%20Pre%2DSub%20Spelthorne%20LP%202022%2D2037%20%2D%20Surrey%20CC%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Miss Zoe Chick (41555105)</b>	
<b>Organisation: River Thames Scheme</b>	
<b>Response ID: 1126672</b>	
<b>Policy / Evidence Base / Part of Plan: Policy E5: Open Space and Recreation</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Policy E5: Open Space and Recreation (Main Policy) We have reviewed this policy and suggest that support is added to this policy for major proposals for new green and blue infrastructure that include new areas of open space. Recommended action: To review the policy wording and include support for major new green and blue infrastructure proposals providing new areas of open space. Please see attached for full response.	
<b>Question 6: You can upload any modifications below.</b>	
RTS -Redacted RTS Letter Pre-Sub Spelthorne LP 2022-2037 - Surrey CC_Redacted.pdf	

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618715/PDF/-/RTS%20%2DRedacted%20RTS%20Letter%20Pre%2DSub%20Spelthorne%20LP%202022%2D2037%20%2D%20Surrey%20CC%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Lorraine Childs (41657889)</b>
<b>Organisation:</b>

<b>Response ID: 1124232</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Please accept this as my objection to the development of the Running Horse green belt. This is due to the local infrastructure being insufficient to accommodate this E.g doctors, transport as well as increased traffic/pollution on already heavy traffic roads Lorraine Childs
<b>Question 6: You can upload any modifications below.</b>
No Response

**Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?**

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Dr John Clarke (25206657)</b>	
<b>Organisation:</b>	
<b>Response ID: 1112885</b>	
<b>Policy / Evidence Base / Part of Plan: Policy SP1: Staines-upon-Thames</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Staines does not nearly have the infrastructure to accomodate the number of high density high rise buildings proposed with the associated 50% increase in it's population. Staines is a riverside, low-medium rise market town and speculative, generic high rise high density buildings will be significantly out of scale and context, as well as detracting from its character and existing economic, social and environmental cohesion. Some of the proposals require the unsustainable demolition of iconic, characterful buildings to be replaced by low aesthetic/material structures.	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent:</b> Tom Clarke (19553089)
<b>Organisation:</b> Theatres Trust

<b>Response ID:</b> 1113822
<b>Policy / Evidence Base / Part of Plan:</b> Policy EC4: Leisure and Culture
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
We welcome the Local Plan's position with regard to the protection of facilities within the borough, which is consistent with paragraph 93 of the NPPF.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
No Response
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Mike Clayton (41294529)</b>
<b>Organisation:</b> Bernard Clayton

<b>Response ID:</b> 1111838
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Local green space: Sunbury common : Catherine Drive With reference to the green space in Catherine Drive, this area needs to be classed as "local green space". My father is 89 and uses this green space for exercise on a daily bases. The area is close to his house in Howard Close (much closer than Groveley Park) and is walking distance for his daily exercise. It will be a criminal offence if this green area is lost.
<b>Question 6:</b> You can upload any modifications below.
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Joan Clough (41904033)</b>
<b>Organisation:</b>

<b>Response ID: 1115631</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Obviously we'd all like to keep green spaces and appreciate some needs to be used but I feel enough has been taken in this area spelthorne for various reasons. Our key services cant support all developments now . Roads cracking up yet again with traffic . Too many people trying to access services not able to give service . Also with mental health as is we need green spaces to go to .
<b>Question 6:</b> You can upload any modifications below.
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Miss Karen Collins (42019457)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117665</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
LGS Ashford Town Queens Walk I am writing to advise on the small recreation park accessed from Queens walk which must be protected as local green space. This area is a highly used recreation area which my family use on a daily basis for walking our dog, allowing him to be off lead in a safe environment and playing with our young children. We often meet up with other residents here to catch up, play football and pass the time of day. Also we have met a lot of dog owners who use the field and all the dogs can socialise together. This would be a travesty for this area to be earmarked for development.	
<b>Question 6:</b> You can upload any modifications below.	

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Lee Collins (42020929)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117672</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
LGS Ashford town: Queens Walk I am writing to advise on the small recreation park accessed from Queens walk which must be protected as local green space. This area is a highly used recreation area which my family use on a daily basis for walking our dog and playing with our young children. We often meet up with other residents here to catch up, play football and pass the time of day. This would be a travesty for this area to be earmarked for development.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Chris Colloff (42074113)</b>
<b>Organisation:</b> Thames Water

<b>Response ID:</b> 1118973
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
We support the requirement in Policy PS1 for new residential development to achieve a water efficiency standard of 110litres per person per day (l/p/d). As noted in the footnotes to the policy, this requirement will be implemented through building regulations where planning conditions set a requirement for 110 l/p/d. Given that the whole of Spelthorne is located in an area identified by the Environment Agency as being an area of serious stress it is considered that standard conditions should be applied to all residential development approvals requiring the 110l/p/d standard to be met.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
No Response
<b>Question 6:</b> You can upload any modifications below.
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Chris Colloff (42074113)</b>
<b>Organisation: Thames Water</b>

<b>Response ID: 1124630</b>
<b>Policy / Evidence Base / Part of Plan: Policy PS1: Responding to the climate emergency</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not effective
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not Consistent with National Policy was also selected. The Pre-submission Local Plan provides for the release of land from the Green Belt in order to deliver new housing but does not consider land required to meet other development needs such as infrastructure. At the preferred options stage the proposed allocation for land to the south of Ashford Common WTW (LS1/007) stated that “The whole water treatment works was identified as an area for further consideration through the Green Belt Assessment Stage 2, however, in line with the NPPF, only the land required to meet needs should be released.” Excluding the release of Ashford Common Water Treatment Works (WTW) is not considered to be consistent with the NPPF as a narrow view of development needs has been taken focusing on residential development. In order to deliver growth it will be necessary for development to be supported by necessary infrastructure. Water and wastewater infrastructure requirements are reviewed every 5 years as part of a water companies business plans. As such it is not possible to identify all upgrades that will be required across the whole Local Plan period as the requirements will depend on a range of factors including development within Spelthorne and development within adjoining boroughs together with the requirements of regulators. Upgrades

are often required at operational sites such as Ashford Common WTW in order to cater for growth or address other regulatory requirements. As such there will be future needs for development on the site.

The WTW includes a range of buildings, plant and machinery required in association with the treatment of water including 32 filter tanks which are all structures raised above ground level, contact tanks, silos, filter buildings, pump house buildings. In total the built up area of the works containing plant, machinery, buildings and roadways covers an area of around 32ha.

Given that the site is a brownfield site within the Green Belt which is predominantly covered in plant, machinery and buildings it is considered that the site should be removed from the Green Belt. The site is acknowledged to make a limited contribution to the purposes of the Green Belt in the Green Belt review documents supporting the Pre-Submission Local Plan. These include the Green Belt Assessment Stage 2 which confirms that the sub area 29-a which is mostly made up of Ashford Common WTW “Meets Purpose assessment criteria weakly, and makes a less important contribution to the wider strategic Green Belt.” The assessment confirms that the site make no more than a weak or very weak contribution to any of the purposes of the Green Belt set out in the NPPF.

Furthermore:

The Thames Water site at Hydes Field, on land to the north of Hampton Water Treatment Works (WTW), Upper Sunbury Road, forms part of a wider site which straddles Spelthorne and the London Borough of Richmond upon Thames. A copy of a site location plan is provided below. The site is being assessed for a new effluent treatment plant for water supply as part of Thames Water’s new Water Resource Management Plan and given the potential need for essential water infrastructure it is considered that the site should be removed from the Green Belt. Representations have been made in relation to the removal of the land at the site that lies within LB Richmond upon Thames from the Green Belt in response to their Local Plan consultations.

The site is retained operational land with leases to 3<sup>rd</sup> parties covering part. This site is currently within the Green Belt, with the eastern part of the site lying within the London Borough of Richmond. The site is well contained and sandwiched between development along Oldfield Road and Portlane Brook (with Kempton Racecourse beyond) with Upper Sunbury Road forming the southern boundary and the railway line to the north. Taken as a whole it is considered that the site does not perform strongly in Green Belt terms. The Stage 2 Green Belt review considers a parcel of land to the west of the site under parcel 28-a but excludes the area of Hydes Field from detailed consideration. The release of the part of Local Area 28 to the east of parcel 28-a together with release of land within LB Richmond from the Green Belt would not adversely impact on the purposes of the Green Belt identified in the NPPF and would assist with the delivery of essential water infrastructure to help meet identified infrastructure needs. It is therefore considered that the site should be removed from the Green Belt.

London’s water needs are the key driver for the strategic resource options programme which supports the development and delivery of strategic schemes that will provide long term resilience to clean water provision for the region. This site represents a large landholding strategically located near key existing sewage treatment sites where effluent would be obtained (Mogden STW in LB Hounslow and Hogsmill STW in RB Kingston upon Thames), water treatment sites (Hampton WTW; Kempton WTW; Walton WTW) and a number of reservoirs in south west London and therefore is critical to

supporting this strategic development. As such, it is considered that exceptional circumstances exist to release this site from the Green Belt in order to ensure the delivery of critical infrastructure is made more straightforward within the planning system.

The Hydes field site is retained operational land and is included in a review that Thames Water is carrying out of its landholdings to establish both strategic needs for future infrastructure, and also whether a site can be released for redevelopment (land to West of Stain Hill West Reservoir).

Consistent with that review process and to ensure appropriate development plan support is available for these potential essential infrastructure developments, it is also considered that the Hydes Field site should be allocated in the new Local Plan as a future infrastructure development site, with its use defined as for water infrastructure provisions.

Furthermore:

Site LS1/007 was included as a draft allocation for 178-280 dwellings in the preferred options Local Plan consultation in 2019 but is omitted as a site allocation in the pre-submission Local Plan. In the site assessments forming the evidence base for the pre-submission Local Plan it is concluded that the site performs only a limited role in strategic Green Belt terms but more moderately against Green Belt purposes. The Stage 2 Green Belt Assessment of parcel 29-c, which contains the site, indicated that the site does not make more than a weak or very weak contribution to any of the purposes of the Green Belt. The conclusions confirm that the site has qualities which adhere to the spatial strategy and it appears that the main reason for the proposed allocation not progressing was due to objections received at the preferred options stage. It is also noted that the Stage 2 Green Belt Assessment confirmed that “the removal of these two sub-areas (sub area 29-a and 29-c) in combination would, cumulatively, have little impact on the wider Green Belt.”

The consultation response report for the preferred options consultation indicates that the objections to the allocation of site LS1/007 related to the decimation of Charlton Village and its rural setting and loss of views. The objections received are likely to have been influenced by the proposed density of development.

It is noted that while the draft allocation at the preferred options stage and referred to use of the site to deliver 178-280 residential units the site was promoted for 150-200 units. The higher level of development may have influenced feedback at the preferred options stage. It is considered that the site could provide lower levels of housing around 150-200 units which would help contribute to the housing needs for the Borough while addressing concerns raised at the preferred options stage, particularly given that the officers assessment at the preferred options stage indicated that vegetation on the boundary shields the site from existing properties. Notwithstanding that the site could deliver 150-200 units, the site could also deliver a lower density scheme focusing on 3 and 4 bed properties which would help to meet the demands for family housing identified in the SHMA. The site includes open fields, some existing vacant buildings and areas of woodland. A lower density development could be accommodated on the site or on part of the site helping to deliver housing needed in the local area while also minimising any impact on the rural setting of the area and providing areas of open space for the benefit of new and existing residents. An indicative example of a lower density schemes is attached below for information.

The pre-submission Local Plan indicates sources of housing supply to deliver 9,439 units between 2022 and 2037. While this number slightly exceeds the objectively assessed need of 9,270 units additional allocations of housing would further assist with ensuring delivery of housing by mitigating any

potential under-delivery of allocated housing. Furthermore, allocation of additional sites would assist with ensuring that there would not be a requirement to make further amendments to Green Belt boundaries at the end of the Local Plan period ensuring compliance with paragraph 143 of the NPPF. The removal of both the land in parcels 29-a and 29-c is acknowledged to have little impact on the wider Green Belt and as such it is considered that there is no need to retain the sites in the Green Belt given their limited function against the purposes of the Green Belt set out in the NPPF. Please see attached form for location plan of Hydes Field and LS1/007

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

The Ashford Common Water Treatment Works site should be removed from the Green Belt. The removal of the site from the Green Belt is supported by the evidence base documents including the Green Belt Assessment Stage 2. Its removal from the Green Belt will assist with the delivery of any future upgrades to an essential infrastructure site that require planning permission helping to deliver infrastructure efficiently by minimising policy constraints on the delivery of essential new buildings. It will therefore ensure that the amendments to the Green Belt. It is also noted that a more open area of sub-area 29-a is proposed to be released from the Green Belt to facilitate residential development under site allocation LS1/024.

Removal of the site from the Green Belt will help ensure that the amendments to Green Belt boundaries are consistent with the NPPF by ensuring the plan considers all development that may be required to deliver growth and by ensuring that the Green Belt does not include land which it is unnecessary to keep permanently open.

The area of Hydes Field that lies within Spelthorne should be removed from the Green Belt to help facilitate future water infrastructure development. Site LS1/007 should be included as a site allocation within the Local Plan and removed from the Green Belt alongside Ashford Common Water Treatment Works. The inclusion of the site would help ensure housing delivery in line with the objectively assessed needs by providing additional choice in the market and mitigating against potential under-delivery on other allocated sites.

Removal of the site from the Green Belt will help ensure that the amendments to Green Belt boundaries are consistent with the NPPF by ensuring the plan considers all development that may be required to deliver growth, by ensuring that the Green Belt does not include land which it is unnecessary to keep permanently open and by avoiding a need to alter Green Belt boundaries again at the end of the Local Plan period.

**Question 6:** You can upload any modifications below.

22.09 Spelthorne Local Plan Response Form - Hydes Field.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/603809/PDF/-/22%2E09%20Spelthorne%20Local%20Plan%20Response%20Form%20%2D%20Hydes%20Field%2Epdf>

22.09 Spelthorne Local Plan Response Form - LS1-007.pdf



<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/603810/PDF/-/22%2E09%20Spelthorne%20Local%20Plan%20Response%20Form%20%2D%20LS1%2D007%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Chris Colloff (42074113)</b>
<b>Organisation:</b> Thames Water

<b>Response ID:</b> 1118938
<b>Policy / Evidence Base / Part of Plan:</b> Policy E3: Managing Flood Risk
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not effective
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Policy E3 relates to flooding and references the requirement for development to incorporate SuDS. To ensure that the policy is as effective as possible at maximising the benefit of SuDS, consideration should be given to including a requirement for developments to aim to achieve greenfield run-off rates. A similar requirement is included in the London Plan. Part 9 of Policy E3 relates to basement development. Basements by their subterranean nature can be at risk of sewer flooding should sewer surcharge and wording should be included to ensure that any basement development is protected from the risk of sewer flooding.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
It is considered that the policy should be revised to require that developments aim to achieve greenfield run-off rates or better. In addition, it would be beneficial to include in the policy or supporting text that development proposals should demonstrate that they have followed the hierarchy for use or disposal of surface water set out below with approval only being given for schemes that discharge to a combined sewer where it has been demonstrated that all other options are not possible.

- 1) Store rainwater for later use
- 2) Use infiltration techniques, such as porous surfaces in non-clay areas
- 3) Attenuate rainwater in ponds or open water features for gradual release
- 4) Attenuate rainwater by storing in tanks or sealed water features for gradual release
- 5) Discharge rainwater direct to a watercourse
- 6) Discharge rainwater to a surface water sewer/drain
- 7) Discharge rainwater to the combined sewer.

In relation to Part 9 of the policy on basement development it is considered that the following requirement should be added:

'New basement development connected to the sewer network will be required to be fitted with a positive pumped device in order to protect from the risk of sewer flooding.'

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Chris Colloff (42074113)</b>
<b>Organisation:</b> Thames Water

<b>Response ID:</b> 1118943
<b>Policy / Evidence Base / Part of Plan:</b> Policy E4: Environmental Protection
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not effective
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
The aims of Policy E4 are supported. However, it is considered that the scope of the policy should be expanded to ensure that new development should not be located in areas where future occupiers may be affected by existing sources of odour unless it is demonstrated that there would be no adverse impact on the amenity of future occupiers or that any necessary mitigation measures have been identified and secured. In relation to light pollution, the scope of the policy should also be widened to ensure that occupiers of new developments are not adversely affected by existing sources of light pollution while the policy should also ensure that development is not unacceptably affected by existing sources of vibration unless acceptable mitigation measures are proposed and secured.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
The policy should be expanded to include reference to odour and to ensure that development is not located in areas where the amenity of future occupiers may be adversely affected by existing sources of odour unless appropriate mitigation measures are secured.

The wording of section 7 of the policy should be revised to ensure that the amenity of occupiers of new development is not adversely affected by existing light sources.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Chris Colloff (42074113)</b>
<b>Organisation: Thames Water</b>

<b>Response ID: 1118984</b>
<b>Policy / Evidence Base / Part of Plan: Policy ID1: Infrastructure and Delivery</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
In relation to Policy ID1 we support the reference to working with infrastructure providers and developers to ensure the delivery of infrastructure necessary to enable development and the reference to potential phasing of development. Thames Water and required to fund and deliver any necessary upgrades to water and wastewater networks required to support growth in the areas they serve. In relation to water and wastewater infrastructure, it can take 18months to 3 years to plan and deliver network upgrades required to support growth and work is unlikely to progress until there is certainty of development coming forward. As such phasing conditions may be necessary to ensure that that the relevant phase of development is not occupied until any necessary infrastructure upgrades have been delivered and early engagement from developers can help with the co-ordination of development and infrastructure delivery. While the intent of paragraph 9.9 is supported it does not accurately reflect how water and wastewater infrastructure is delivered. At the time of making an application it may be known that there is a constraint but that there is sufficient time to design and deliver a solution ahead of occupation of development. For other developments it may be that phasing is required to allow sufficient time to design and deliver any necessary upgrades. As such the text should be revised to ensure it accurately reflects how water and wastewater infrastructure is delivered.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

While the policy is supported it is considered that the supporting text could be strengthened to help emphasise the potential timescales required to deliver water and wastewater upgrades and encourage early engagement by developers with water and wastewater undertakers and clarify the approach for delivery of water and wastewater infrastructure. It is therefore suggested that paragraph 9.9 is amended to read:  
“Developers, where required, will have to demonstrate that wastewater and water network capacity will be in place ahead of the occupation of development. Developers are encouraged to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Local network upgrades can take 18months to 3 years to plan and deliver with strategic upgrades taking 3-5years. Where there is an infrastructure capacity constraint, the Council will where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development. (Please see attached form for deletion)

**Question 6:** You can upload any modifications below.

22.09 Spelthorne Local Plan Response Form - Policy ID1.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/588384/PDF/-/22%2E09%20Spelthorne%20Local%20Plan%20Response%20Form%20%2D%20Policy%20ID1%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent:</b> Mr Chris Colloff (42074113)
<b>Organisation:</b> Thames Water

<b>Response ID:</b> 1118876
<b>Policy / Evidence Base / Part of Plan:</b> AS1/011 (Land at Former Bulldog Nurseries, Town Lane)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not effective
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
In relation to the proposed allocation of the former Bulldog Nurseries site it is noted that widening of the cycleway along the A30 is listed as an opportunity. Any widening of the cycleway which would involve cutting into the toe of Staines Reservoir would need to be avoided. Elsewhere this has required a small retaining wall to facilitate the provision of an existing cycleway. For all proposed allocations which are adjacent to a reservoir including AS1/003, AS1/011, ST1/043 and ST4/025 security of the reservoir will need to be maintained with appropriate security fencing between the sites and the reservoir land. In addition, the methodology for any excavations within the zone of influence of the reservoir will need to be agreed in writing with Thames Water. A 5m wide strip between the toe of the reservoir embankments and any development site will need to be retained clear of any obstructions. Any planting should take place outside of the 5m strip.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
In order to ensure that any widening of the cycleway would not impact on the embankment of Staines Reservoir it is considered that the wording of the opportunity should be revised to read:



"cycleway widening along the A30/London Road subject to any design being agreed by Thames Water".

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Chris Colloff (42074113)</b>
<b>Organisation:</b> Thames Water

<b>Response ID:</b> 1119001
<b>Policy / Evidence Base / Part of Plan:</b> ST1/043 (Land East of 355 London Road)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
For all proposed allocations which are adjacent to a reservoir including AS1/003, AS1/011, ST1/043 and ST4/025 security of the reservoir will need to be maintained with appropriate security fencing between the sites and the reservoir land. In addition, the methodology for any excavations within the zone of influence of the reservoir will need to be agreed in writing with Thames Water. A 5m wide strip between the toe of the reservoir embankments and any development site will need to be retained clear of any obstructions. Any planting should take place outside of the 5m strip.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
No Response
<b>Question 6:</b> You can upload any modifications below.
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Chris Colloff (42074113)</b>
<b>Organisation: Thames Water</b>

<b>Response ID: 1118995</b>
<b>Policy / Evidence Base / Part of Plan: ST4/025 (Coppermill Road)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Thames Water as the landowner supports this site allocation for residential development. Development of the site would result in completion of a linear form of development along Coppermill Road and would not conflict with the aims of land being included in the Green Belt. The removal of this site is therefore considered to be justified. It is agreed that there are no absolute constraints and that appropriate assessment and mitigation can ensure all policy criteria are met. For all proposed allocations which are adjacent to a reservoir including AS1/003, AS1/011, ST1/043 and ST4/025 security of the reservoir will need to be maintained with appropriate security fencing between the sites and the reservoir land. In addition, the methodology for any excavations within the zone of influence of the reservoir will need to be agreed in writing with Thames Water. A 5m wide strip between the toe of the reservoir embankments and any development site will need to be retained clear of any obstructions. Any planting should take place outside of the 5m strip.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Chris Colloff (42074113)</b>
<b>Organisation: Thames Water</b>

<b>Response ID: 1118871</b>
<b>Policy / Evidence Base / Part of Plan: AS1/003 (Former Staines Fire Station, Town Lane)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Thames Water as the landowner supports this site allocation for high density residential development. The allocation refers to the presence of the ambulance 'Make Ready Centre'. This use is not taking place on the site and therefore should not be referred to. As the site is not currently used as a 'Make Ready Centre' the use does not need to be relocated to make development of the site acceptable. It is unclear where the council has received this information from. It is considered that this site could come forward within the first 5 years of the plan (2023-27) as there are no existing uses on site, pre-application discussions have commenced between the landowner and Spelthorne Borough Council, and ecology surveys have been undertaken. For all proposed allocations which are adjacent to a reservoir including AS1/003, AS1/011, ST1/043 and ST4/025 security of the reservoir will need to be maintained with appropriate security fencing between the sites and the reservoir land. In addition, the methodology for any excavations within the zone of influence of the reservoir will need to be agreed in writing with Thames Water. A 5m wide strip between the toe of the reservoir embankments and any development site will need to be retained clear of any obstructions. Any planting should take place outside of the 5m strip.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>

In order to reflect the fact that the site is currently vacant the wording "The site is currently occupied by an ambulance 'Make Ready Centre' and is required operationally for the ambulance service. An alternative location for this use will therefore require identification prior to the redevelopment of this site." should be removed from the site description.  
The wording "Identification of alternative location for the ambulance 'Make Ready Centre' prior to redevelopment." should be deleted from the site specific requirements given there is no such existing use to relocate.  
The delivery timeframe should be revised to 2023-2027 to reflect the fact that the site is currently vacant and available for development.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Jill Comerford (41904193)</b>
<b>Organisation:</b>

<b>Response ID: 1115635</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Protect the precious green spaces and playing fields for the sake of FUTURE GENERATIONS, and of course natural wildlife, all so precious. Please no development which will destroy these.
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response



If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: D. Cook (40996865)</b>
<b>Organisation:</b>

<b>Response ID: 1124079</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
RE: KEEP KEMPTON GREEN I am writing to let you have my comments that I would like Kempton Park to be protected from development. Thank you for your help.
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
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Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: George Cooper (42051201)</b>	
<b>Organisation:</b>	
<b>Response ID: 1118431</b>	
<b>Policy / Evidence Base / Part of Plan: HS1/002 (Land at Croysdale Avenue/ Hazelwood Drive)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
<p>I write to you and honourable members of our local council - Croysdale Avenue - with regard to the Avenue/Hazelwood following plans HS1/002 (Land at Croysdale Avenue/Hazelwood Drive, Sunbury) (1.68ha) for 67 units. I and family would like to strongly voice our views and opinions on the proposal to which we are extremely apposed to. I note that my fiancée and I moved here only 10 months ago and today was the first I was informed of the plan nor had my neighbours been informed (in case either one of us had missed the important plan/plans).</p> <p>Noting the above I/we have formalised the response to you and honourable members:</p> <p>We Call on the Council not to amend existing Green Belt boundaries but to respect them</p> <p>We Call on the Council not to make a pro-active case for Green belt release in its draft Local Plan and not to declare that there are “exceptional circumstances” to justify Green Belt release.</p>	

We clearly reject the Council's classification of certain Green belt areas as "weakly performing" as well as the criteria invented to justify such classification. All Green Belt sites perform one or more important function by merely existing including checking the unrestricted sprawl of large built up areas, preventing neighbouring towns from merging into one another, assisting in safeguarding the countryside from encroachment, preserving the setting and special character of historic towns; and — extremely importantly — assisting in urban regeneration, by encouraging the recycling of derelict and other urban land (para.138 of the National Planning Policy Framework). All Green Belt is of considerable importance, is valued by residents and should remain protected.

As a direct result we hereby express our disappointment that the Council has also refused to designate 19 Green Belt areas (that were proposed by residents) as Local Green spaces and ask the Council to reverse this refusal.

I would like to take this opportunity to thank-you for reading this and for taking this email into consideration amongst the many others I am certain will have been sent.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Greg Cooper (42827329)</b>
<b>Organisation: Hines UK</b>

<b>Response ID: 1128256</b>
<b>Policy / Evidence Base / Part of Plan: SN1/006 (Land to west of Long Lane and south of Blackburn Trading Estate)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
In relation to question: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to: Not justified, Not effective, Not consistent with national policy were also selected. Hines UK supports the removal of this land from the Green Belt as part of the Plan process, however, we do not support its allocation of this site for housing under SN1/006. This land is not available for housing and should be allocated for Warehousing and Distribution (Use Class B8) and General Industrial (Use Class B2) employment uses. Hines UK is a privately owned global real estate investment firm with global assets spread across 255 cities in 27 countries. Hines oversees investment assets under management valued at approximately \$83.6 billion. One such asset is Dnata City (referred to as "Blackburn Trading Estate" in the description provided by the Council), one of the key distribution hubs for Heathrow Airport, which is located immediately to the north of allocation SN1/006. Hines UK has an option on allocation SN1/006 for development for employment purposes. The land forms a natural extension to Dnata City and is proposed by Hines for employment uses, not residential development. The site is therefore not available for residential development. This was explained at a pre-application meeting in December 2021, but has not been taken account of in the Officer's Assessment of the Site in June 2022, or the latest

iteration of the Plan, which allocates the site for Housing for 200 units with delivery in Years 1-5 (2023-2027). This site is not available, nor achievable within this timeframe for residential development. The Plan is therefore unsound as a consequence. Moreover, Site SN1/006 given its co-location with both Heathrow Airport and the 24hr operations of Dnata City, it is not an appropriate housing site. The site is at a strategically important employment location which is suitable for Warehousing and Distribution (Use Class B8) and General Industrial (Use Class B2) employment uses.

The Officer's Assessment of the Preferred Options sites (November 2019) confirms, in respect of this site, its potential suitability for housing development, including:

'Unlikely to be acceptable (for residential) as site is more suited to employment development given the location of other similar businesses.' (( ) our insert)

'Site significantly affected by aircraft noise from Heathrow Airport, which would be of particular concern for residential property.'

'Site remote from train stations. Nearest bus stop is located 1.2km walk if accessed from Long Lane.'

The Overall conclusion of the preferred options in November 2019 was:

'Site considered appropriate to take forward due to weak performance against Green Belt purposes, few to no constraints and only limited visual amenity value. Consideration would need to be given as to which is the most appropriate use to take forward, as a both a residential and a commercial scheme have been proposed by two different promoters. The proximity to cargo uses to the north and Heathrow Airport beyond would suggest an employment use. Even though the pressing need for the strategy is housing, there is likely to be need for airport related cargo facilities and the existing housing is only at the corners of the site, limiting the extent to which this site would lend itself to residential. The expectation would be that this would be most suited to a storage and distribution use as an extension to the existing cargo estate to the north. Material released during the first stage of consultation on Heathrow Airport expansion suggests the site could be used for airport related development, likely to be cargo. If not proposed for allocation through the Local Plan or depending on timing, Heathrow Airport Ltd would need to make the case for the site being developed as part of the DCO process and arguing that Very Special Circumstances exist that would outweigh the harm.'

There is no explanation, nor justification of how this position has changed to confer an acceptability of this site for a significant housing development (of 200 units) in the latest draft Plan. The Officer's Assessment, dated June 2022 also does not take into account the option conferred to Hines UK for the development of this site for commercial development. This was explained in a pre-app Meeting in December 2021, in that the site is not available for residential development. Since then, Hines and its advisors have been working towards a solution alongside Dnata which achieves direct access onto the Southern Perimeter Road, through Dnata City. This is considered both significant and material to the realisation of the site for employment uses and will take any proposed traffic away from Long Lane and the residential properties fronting this.

Furthermore, we understand that there is significant fuel line running within the site. This does not appear to have been considered as part of the Council's assessment of suitability of the site for residential development, and we are not aware of any engagement with the HSE on this matter.

Critically, the site will not be brought forward for residential development under the option conferred to Hines.

The site is not available within the timescale of Years 1-5, and its delivery of 200 residential units will not be achieved. The draft Spelthorne Plan's reliance on this makes the Plan unsound. The site is recognised as weakly performing Green Belt and it is right that the Council adopt a longterm vision for the removal of this land from the Green Belt as part of its Green Belt review.

The Council's most recent Employment Land Needs Assessment (2022) acknowledges that the locational characteristics and need for B8 floorspace cannot simply be replaced at those locations no longer required for B2 (General Industrial) and that there remains uncertainty over the future expansion of Heathrow, but notes, since leaving the EU, delays in goods held at borders is causing companies to move from sea to air to transport. This additional need is however not modelled. The Assessment also notes the importance of qualitative (including locational characteristics) as well as quantitative assessment, concluding in respect of the Northumberland Close / Long Lane area:

'Northumberland Close is largely taken up by 'Dnata city', 19,000 sq m of three purpose-built modern warehousing and office units for cargo handling operations. The close proximity to Heathrow means the area is in demand now and is likely to remain so in the future.'

Critically, the Council's Functional Economic Area analysis (2017), offers no update or analysis of how the redevelopment of sites around the key employment area of Long Lane / Northumberland Close for residential, rather than employment uses, impacts the strategic contribution Spelthorne makes alongside other Authorities to the future prosperity of Heathrow, and in turn the important economic contribution this makes to the residents of Spelthorne.

The level of harm to the Green Belt caused by the loss of the Site would be minimal as it does not serve any of the five Green Belt purposes defined by the NPPF, recognised by the Council in its proposed release of the land.

We consider, notwithstanding the Council's proposed removal of this land from the Green Belt, given its weak performance against Green Belt criteria, that there are very special circumstances to allocate this site for employment purposes. These include:

- The strategic location of the site relative to Heathrow Airport, the need to allow for further commercial and logistics growth associated with the Airport (regardless of whether the 3<sup>rd</sup> runway option is pursued)
- Existing and future requirements as the key air hub into the UK.
- Constraint of future supply • The significant and sustained growth in logistics post COVID
- The strategic importance of ensuring economic activity is sustained in this part of Spelthorne, linked with the airport and its wider regional, national and international role.

The proximity of site SN1/006 with the airport, particularly the Heathrow Cargo Handling facilities of Cargo City, and the strategic positioning of this site relative to other key airport related B2 and B8 Uses accessed from the Southern Perimeter Road, including Dnata, strongly favour the future use of this site for commercial development comprising B2 and B8 Uses. The Plan should recognise and reflect this through the re-allocation of this land for Warehousing and Distribution (Use Class B8) and General Industrial (Use Class B2) employment uses.



**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

Re-allocation of SN1/006 for Employment Development under Class B2 (General Industrial) and B8 (Warehousing and Distribution) Uses.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: The proposed re-allocation of SN1/006 for Employment Development under Class B2 (General Industrial) and B8 (Warehousing and Distribution) Uses is an important element of delivery of development within Spelthorne and a key allocation of the Plan.

For these reasons these representations should be further rehearsed / explored as part of the formal hearing sessions.

<b>Respondent: Robert Corcoran (25434753)</b>
<b>Organisation:</b>

<b>Response ID: 1112341</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy SP6: River Thames and its Tributaries
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
The planning for the future of the borough mentions that the banks of the rivers Cole and the Ash will be deculverted and banks will be left natural, very commendable, but what about sweeps ditch, would it not be possible to deculvert it also, at present it's a pumped system, this can't be good for the environment, over the years I've had to phone the council to inform them that the flow had stopped, it seems to me that there's no one in charge of maintaining the pumps, nor clearing the water course where it need clearing to allow flow, it's also an advantage to elevate flooding.
<b>Question 6:</b> You can upload any modifications below.
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Edward Crone (25674625)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117338</b>	
<b>Policy / Evidence Base / Part of Plan: Policy SP1: Staines-upon-Thames</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>I am in favour of the redevelopment of the area.</p> <p>I agree with the SP1 strategy. I think that we under utilize the proximity to the airport, as the public transport links are weak. We need to have a direct train in place and Staines / Ashford needs to be added to Zone 06 to encourage outside visitors to the area.</p> <p>As much as I support the development of the area, there is little mention of local infrastructure, ie doctors, dentists, schools. All of which are currently oversubscribed in the area. The redevelopment will increase the local population and we need to increase our health and education infrastructure to accommodate this increased capacity.</p> <p>Staines is a London suburb with a large family occupancy. We should retain parks and improve family entertainment facilities. ( Bowling, soft play, cinema, restaurants etc)</p>	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No Response	

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Edward Crone (25674625)</b>
<b>Organisation:</b>

<b>Response ID: 1117335</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy SP6: River Thames and its Tributaries
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
No Response
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Edward Crone (25674625)</b>
<b>Organisation:</b>

<b>Response ID: 1117343</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy H3: Meeting the needs of Gypsy, Traveller and Travelling Showpeople
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
I strongly oppose the plans to accommodate the traveller community. This community is already causing issues in our town centre and does not improve our already tarnished reputation
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
No Response
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)



If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Edward Crone (25674625)</b>
<b>Organisation:</b>

<b>Response ID: 1117345</b>
<b>Policy / Evidence Base / Part of Plan: Policy EC4: Leisure and Culture</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Staines is a London suburb with a large family population. We need to improve family entertainment facilities. ( Bowling, soft play, cinema, family restaurants)
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Edward Crone (25674625)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117275</b>	
<b>Policy / Evidence Base / Part of Plan: AS1/011 (Land at Former Bulldog Nurseries, Town Lane)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>I strongly support the development of this plot.</p> <p>It is not obstructing any residents to the west / north west, due to the proximity of the reservoir. It is not obstructing any residents to the south due to the dual carriage way and commercial units opposite the site.</p> <p>This land is unused and an ideal location for development.</p> <p>I would support more than the proposed 24 units, and a building with a higher height, on this site if it was suggested.</p>	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No Response	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Edward Crone (25674625)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117277</b>	
<b>Policy / Evidence Base / Part of Plan: AS2/006 (Land East of Desford Way)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>I do not support the development of this plot.</p> <p>I do not support the encouragement of drawing the travelling community to the area.</p> <p>The town suffers from a reputation and image problem, this would not help either.</p> <p>The town centre suffers from being terrorised by the travelling community ever weekend. This plot would only increase the presences of the travelling community and would not improve our town.</p>	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No Response	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Edward Crone (25674625)</b>
<b>Organisation:</b>

<b>Response ID: 1117278</b>
<b>Policy / Evidence Base / Part of Plan: AT1/002 (Land East of Ashford Sports Club, Woodthorpe Road)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
I support the development of this site if it is to enhance the adjacent sport facilities. The local redevelopment plan should improve the area and the community. If local facilities are improved, I am in favour of the development
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
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Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Edward Crone (25674625)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117280</b>	
<b>Policy / Evidence Base / Part of Plan:</b> AT1/012 (Ashford Community Centre, Woodthorpe Road) - Pre-submission Spelthorne Local Plan (Reg 19) consultation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
I support the development of this site if it is to enhance the community centre The local redevelopment plan should improve the area and the community. If local facilities are improved, I am in favour of the development	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Edward Crone (25674625)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117281</b>	
<b>Policy / Evidence Base / Part of Plan: AT3/007 (Ashford multi-storey car park, Church Road)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
I strongly support the development of this site if it is to enhance the adjacent sport facilities. The local redevelopment plan should improve the area and the community. The old car park is an eye sore and unusable. This opposite Brooklands site has been developed to a high standard, and this site redevelopment would complement it well	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No Response	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Edward Crone (25674625)</b>
<b>Organisation:</b>

<b>Response ID: 1117284</b>
<b>Policy / Evidence Base / Part of Plan: AT3/016 (23-31 (not 11-19) Woodthorpe Road)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
I support this redevelopment
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Edward Crone (25674625)</b>
<b>Organisation:</b>

<b>Response ID: 1117285</b>
<b>Policy / Evidence Base / Part of Plan: HS1/002 (Land at Croysdale Avenue/ Hazelwood Drive)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
I support this redevelopment
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response





<b>Respondent: Mr Edward Crone (25674625)</b>
<b>Organisation:</b>

<b>Response ID: 1117287</b>
<b>Policy / Evidence Base / Part of Plan: HS1/009 (Bugle Nurseries, Upper Halliford Road)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
I support this redevelopment
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Edward Crone (25674625)</b>
<b>Organisation:</b>

<b>Response ID: 1117286</b>
<b>Policy / Evidence Base / Part of Plan: HS1/012 (Land East of Upper Halliford, Nursery Road)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
I support this redevelopment
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Edward Crone (25674625)</b>
<b>Organisation:</b>

<b>Response ID: 1117288</b>
<b>Policy / Evidence Base / Part of Plan: HS2/004 (Land south of Nursery Road)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
I support this redevelopment
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Edward Crone (25674625)</b>
<b>Organisation:</b>

<b>Response ID: 1117289</b>
<b>Policy / Evidence Base / Part of Plan: LS1/024 (Land at Staines Road West and Cedar Way)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
I support this redevelopment
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response





<b>Respondent: Mr Edward Crone (25674625)</b>
<b>Organisation:</b>

<b>Response ID: 1117290</b>
<b>Policy / Evidence Base / Part of Plan: SE1/005 (Benwell House, Green Street)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
I support this redevelopment
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Edward Crone (25674625)</b>
<b>Organisation:</b>

<b>Response ID: 1117291</b>
<b>Policy / Evidence Base / Part of Plan: SE1/024 (Annandale House, Hanworth Road)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
I support this redevelopment
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Edward Crone (25674625)</b>
<b>Organisation:</b>

<b>Response ID: 1117292</b>
<b>Policy / Evidence Base / Part of Plan: SN1/006 (Land to west of Long Lane and south of Blackburn Trading Estate)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
I strongly support this redevelopment This land is unused and due to its proximity to the industrial estate, it is not seen as an eye catching plot. This is a ideal spot for development
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
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Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Edward Crone (25674625)</b>	
Organisation:	
<b>Response ID: 1117293</b>	
<b>Policy / Evidence Base / Part of Plan: ST1/037 (Thameside House, South Street)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>I am support of the redevelopment of this site, however I have previously opposed its planned height.  Staines already suffers an image issue and building multiple high-rise developments only strengths this negative reputation.  I am in favour of the development if the height is no taller than 8 floors ( in line with the lower buildings of the London Square development)  The materials used should also be in keeping with the attractive London Square development ( brick slip, metal railings, large glass windows )  The old Bupa building needs to be redeveloped, but the surrounding area and buildings should be considered.  The local redevelopment plan should improve the area and the community.</p>	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No Response	
<b>Question 6: You can upload any modifications below.</b>	
No Response	



**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Edward Crone (25674625)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117294</b>	
<b>Policy / Evidence Base / Part of Plan: ST1/043 (Land East of 355 London Road)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>I do not support the development of this plot.</p> <p>I do not support the encouragement of drawing the travelling community to the area.</p> <p>The town suffers from a reputation and image problem, this would not help either.</p> <p>The town centre suffers from being terrorised by the travelling community ever weekend. This plot would only increase the presences of the travelling community and would not improve our town.</p>	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No Response	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Edward Crone (25674625)</b>
<b>Organisation:</b>

<b>Response ID: 1117295</b>
<b>Policy / Evidence Base / Part of Plan: ST3/004 (Oast House, Kingston Road)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
I am support of the redevelopment of this site, however I have previously opposed its planned height. Staines already suffers an image issue and building multiple high-rise developments only strengths this negative reputation. I am in favour of the development if the height is no taller than 8 floors ( in line with the lower buildings of the London Square development) The materials used should also be in keeping with the attractive London Square development ( brick slip, metal railings, large glass windows ) The local redevelopment plan should improve the area and the community. I am in favour of the new medical centre proposed on the plot. I am in favour of the most recent plans for the plot. I am concerned however about the light and surveillance for the path running parallel to the south of the plot, alongside the train tracks. With the proposed development the path could become dangerous at night.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Edward Crone (25674625)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117299</b>	
<b>Policy / Evidence Base / Part of Plan: ST4/002 (Bridge Street Car Park, Hanover House &amp; Sea Cadet Building, Bridge Street, Staines)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>I am in support of the redevelopment of this site, however I have previously opposed its planned height.  Staines already suffers an image issue and building multiple high-rise developments only strengths this negative reputation.  I am in favour of the development if the height is no taller than 8 floors ( in line with the lower buildings of the London Square development)  The materials used should also be in keeping with the attractive London Square development ( brick slip, metal railings, large glass windows )  The old car park is an eye sore. This is a prime spot in town as it is entry to our town from the bridge. A high quality development should be placed here  The local redevelopment plan should improve the area and the community.  I am concerned about the additional impact it will have on traffic crossing the bridge and along Clarence Street. This is already an issue, and the development would have a serious impact on this.</p>	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No Response	

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Edward Crone (25674625)</b>
<b>Organisation:</b>

<b>Response ID: 1117302</b>
<b>Policy / Evidence Base / Part of Plan: ST4/019 (Former Debenhams Site, High Street)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
I am in support of the redevelopment of this site, however the current façade should not be altered. This is already a fine piece of art deco architecture. The current site should be redeveloped internally only. I strongly oppose the current building being torn down.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
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Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Edward Crone (25674625)</b>
<b>Organisation:</b>

<b>Response ID: 1117304</b>
<b>Policy / Evidence Base / Part of Plan: ST4/025 (Coppermill Road)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
I am in strong favour of developing on this plot. I would support a development with a higher number of allocated residential units.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Edward Crone (25674625)</b>
<b>Organisation:</b>

<b>Response ID: 1117306</b>
<b>Policy / Evidence Base / Part of Plan: ST4/026 (Communications House, South Street, Staines)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
I am in strong support of the redevelopment of this site. The late 70s architecture of the Elmsleigh Centre façade needs to be updated. This includes all surrounding buildings on the site
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Edward Crone (25674625)</b>
<b>Organisation:</b>

<b>Response ID: 1117308</b>
<b>Policy / Evidence Base / Part of Plan: ST4/028 (William Hill / Vodafone/ Monsoon, High Street)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
I am in support of this development
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Edward Crone (25674625)</b>	
Organisation:	
<b>Response ID: 1117313</b>	
<b>Policy / Evidence Base / Part of Plan: AE3/006 (158-166 Feltham Road)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>I strongly support the development of this plot.  It is not obstructing any residents to the west / north west, due to the proximity of the reservoir. It is not obstructing any residents to the south due to the dual carriage way and commercial units opposite the site.  This land is unused and an ideal location for development.  I would support more than the proposed 50 units, and a building with a higher height, on this site if it was suggested.</p>	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No Response	
<b>Question 6: You can upload any modifications below.</b>	
No Response	



**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Edward Crone (25674625)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117309</b>	
<b>Policy / Evidence Base / Part of Plan: AS1/001 (Tesco Extra, Town Lane)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
I am only in favour if its not a highrise planned. I am only in favour of the additional residential units on this site, if it does not block or overlook the residential homes to the north of the site. Any new developments should be located at the west southern corner of the plot, overlooking the street and reservoir. This land is currently unused on the plot.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No Response	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Edward Crone (25674625)</b>
<b>Organisation:</b>

<b>Response ID: 1117315</b>
<b>Policy / Evidence Base / Part of Plan: AS1/003 (Former Staines Fire Station, Town Lane)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
I support this redevelopment
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Edward Crone (25674625)</b>
<b>Organisation:</b>

<b>Response ID: 1117316</b>
<b>Policy / Evidence Base / Part of Plan: HS1/012b (Land East of Upper Halliford Road)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
I support this redevelopment
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Edward Crone (25674625)</b>	
Organisation:	
<b>Response ID: 1117317</b>	
<b>Policy / Evidence Base / Part of Plan: RL1/011 (Land at Staines and Laleham Sports Club, Worple Road)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
I support the development of this site if it is to enhance the adjacent sport facilities. The local redevelopment plan should improve the area and the community. If local facilities are improved, I am in favour of the development Staines is a London suburb for families. Green parks and sports facilities are required for the community	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No Response	
<b>Question 6: You can upload any modifications below.</b>	
No Response	



**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Edward Crone (25674625)</b>
<b>Organisation:</b>

<b>Response ID: 1117320</b>
<b>Policy / Evidence Base / Part of Plan: SC1/006 (Tesco Extra, Escot Road)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
I support this redevelopment
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Edward Crone (25674625)</b>
<b>Organisation:</b>

<b>Response ID: 1117322</b>
<b>Policy / Evidence Base / Part of Plan: SE1/O20 (Sunbury Adult Education Centre, The Avenue)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
I support this redevelopment
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Edward Crone (25674625)</b>
<b>Organisation:</b>

<b>Response ID: 1117325</b>
<b>Policy / Evidence Base / Part of Plan: ST1/028 (Leacroft Centre, Leacroft, Staines)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
I am not in favour for turning this into residential units The Leacroft centre should be restored and used by the community.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Edward Crone (25674625)</b>
<b>Organisation:</b>

<b>Response ID: 1117330</b>
<b>Policy / Evidence Base / Part of Plan: ST1/029 (Surrey County Council buildings, Burges Way, Staines)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
This site should be used for offering something to the community. I support its redevelopment, but for community use. ( Perhaps local infrastructure opportunities. Health centre, dentist, education) No building should be higher than 2 floors, which is in keeping with the surrounding residence buildings.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
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Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Edward Crone (25674625)</b>
<b>Organisation:</b>

<b>Response ID: 1117328</b>
<b>Policy / Evidence Base / Part of Plan: ST1/030 (Fairways Day Centre, Knowle Green, Staines)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
This site should be used for offering something to the community. I support its redevelopment, but for community use. ( Perhaps local infrastructure opportunities. Health centre, dentist, education) No building should be higher than 2 floors, which is in keeping with the surrounding residence buildings.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

**Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?**

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Edward Crone (25674625)</b>
<b>Organisation:</b>

<b>Response ID: 1117337</b>
<b>Policy / Evidence Base / Part of Plan: ST4/004 (96-104 Church Street, Staines)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
I am in strong favour of this development. The Church Street / Lammas Park area is a nice residential area. The industrial site is out of place and does not enhance the adjacent properties
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Edward Crone (25674625)</b>
<b>Organisation:</b>

<b>Response ID: 1117331</b>
<b>Policy / Evidence Base / Part of Plan: ST4/O10 (Riverside car park, Thames Street, Staines)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
I am in strong support for this redevelopment. The riverside and memorial gardens are under used and an unseen jewel in the Staines crown. Removing the under used carpark and expanding the green, with additional cafes is a fantastic use of the space. I would prefer to see this implemented ahead of the 6-10 year delivery time frame
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
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Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Edward Crone (25674625)</b>
<b>Organisation:</b>

<b>Response ID: 1117332</b>
<b>Policy / Evidence Base / Part of Plan: ST4/O11 (Thames Lodge Hotel, Thames Street, Staines)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
I am in strong support of this site being redeveloped The current Thames Lodge on the site is in disrepair, an eyesore and under utilizes its prime riverfront location. A new development with cafes at this location is an excellent opportunity.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
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Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Edward Crone (25674625)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117334</b>	
<b>Policy / Evidence Base / Part of Plan: ST4/023 (Two Rivers Retail Park Terrace, Mustard Mill Road, Staines)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
I am concerned about the height and density of the proposed buildings on this plot. I would support the plans if the height and density of the buildings were reduced The plans suggest a light blocking warren of streets, which do not improve the area. I am in favour for the improved links to the moor at the north of the plot. The loss of parking is also a concern. The town centre can be rather congested as it is already.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No Response	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Edward Crone (25674625)</b>
<b>Organisation:</b>

<b>Response ID: 1117341</b>
<b>Policy / Evidence Base / Part of Plan: ST4/024 (Frankie &amp; Benny's/Travelodge, Two Rivers, Hale Street, Staines)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
I support this development
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Edward Cruttenden (41657441)</b>
<b>Organisation:</b>

<b>Response ID: 1124230</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
5a) My late mother started the now world famous Sunbury Antiques Market at Kempton Park some 40 years ago now (circa 1980). Sunbury Antiques attracts over 5000 visitors per event throughout the year (x23 events a year) to the area providing knock on income to local restaurants, hotels and the wider community with many foreign visitors combining visits to Hampton Court. The fair has become a mecca for the antiques trade and general public alike providing not only an income for them but way of life for everyone who attends, many travel from all four corners of the UK and use the fair as a 'social hub' which is well publicised nowadays with the importance of 'Social cohesion' and the importance of mental health.

Not only is the fair popular with the 'Antiques Trade' providing a "one stop shop" for those who have retail shops in London and the home counties with sellers travelling from all over the UK we also attract many European traders which has meant that the UK based traders now don't have to travel to Europe to source stock which have become especially difficult with the new rules brought in by Brexit.

The film industry is very reliant on the fair with many prop buyers coming in from Shepperton Studios and Pinewood for Disney productions so again have the facility to not travel all over the UK and now with Netflix and Amazon Prime now setting up at Shepperton Studios, Sunbury Antiques is more relevant than ever.

Being located where Kempton is provides the most simple and unobtrusive travel for those attending and the potential knock-on effect, being right next to the M3 and M25 with direct rail links has little impact on local infrastructure .... We also open at 6.30am and most are gone by 3pm thus not effecting the rush our traffic. I have lived in Shepperton for the last 30 years and have seen first hand the impact of pressure on the local infrastructure and local authority resources with more people using them, the thought of Kempton being used for a mass housing project scares me on what negative impact this have on our local community, Sunbury-on-Thames is local village/town and has always been sitting on the banks of the River Thames, yes I appreciate that more housing needs are to met but I think a sustainable, responsible and more sensitive approach is needed. Just by building a 'mass housing project' is simply ticking box's and not taking into account what effect this would have on the local community and surrounding areas, as I understand it 'Green Belt' land was established to stop estates or building projects encroaching on 'Green Spaces'. I spoke to a well-known TV personality who visits our fair and is well known for her programmes about buying and selling homes thus knows a lot about 'out of town mass housing projects' we both agreed the govt and LA need to meet targets but would be more responsible if each town took a percentage rather than one mass building site. The town and local infrastructure simply would not cope with such ideas, the roads are impossible in the mornings and let's not talk about trying to get a Dr's appointment or Dental appointments ... I think this is a very irresponsible and dangerous proposal.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: As mentioned having lived in the area for over 30 years and having a vested interest in a business that has supported and promoted Sunbury-on-Thames and Kempton Park feel I should be able to contribute to the fact that I feel very strongly that isn't a good idea for the local community and would be a disaster if where to go ahead.

<b>Respondent: Jennie Cruttenden (41668641)</b>	
<b>Organisation:</b>	
<b>Response ID: 1124236</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>It's an historic site with so much history that is being ignored</p> <p>Too much of our green space is being taken away when there is already so many empty derelict buildings / office spaces that can be used and sit there empty ... look what's happened to the so called 'Eco Park' and all the green space destroyed</p> <p>The roads, schools, doctors, traffic ... it would be horrendous, the traffic around Sunbury and Hampton is already awful but to add another few thousand to it at least the area would grind to a halt!</p> <p>Kempton Park brings so much to the outskirts of London it would be catastrophic if it was destroyed.</p>	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	



No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Anne Damerell (19552033)</b>	
<b>Organisation: Staines Town Society</b>	
<b>Response ID: 1119695</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ST1: Presumption in Favour of Sustainable Development</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: We find much of the Plan to be unsound because the significant adverse effects on the Borough cannot be justified.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Staines Town Society consider it imperative that some of the new policy statements should be amended as follows: ST1 : Presumption in favour of Sustainable Development: When is there likely to be no relevant policies or out-of-date policies when making a planning decision and why would you grant planning permission in such an instance? Surely it is essential to ensure that policies are available and up-to-date. Please see attached document.	
<b>Question 6: You can upload any modifications below.</b>	
STS response to Local Plan Sep 22, page 2ff.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589789/PDF/-/STS%20response%20to%20Local%20Plan%20Sep%202022%5F%20page%202ff%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589789/PDF/-/STS%20response%20to%20Local%20Plan%20Sep%202022%5F%20page%202ff%2Epdf</a>	



**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Anne Damerell (19552033)</b>
<b>Organisation: Staines Town Society</b>

<b>Response ID: 1119672</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: We find much of the Plan to be unsound because the significant adverse effects on the Borough cannot be justified.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
We wish to be kept updated of future stages of the Plan. Part B: representations Foreword We strongly support and agree with the remarkable foreword to the Plan. The result of this protracted and painful process is a Plan which we commend as a diligent attempt to find the least bad solution to the problem we face, of accommodating a level of housing development which will do significant and permanent damage to Spelthorne and in particular to Staines.

We support the Plan - but we don't like it. Many of the policies are weaker and less proscriptive than their equivalents in the 2009 Plan, and will give less protection to residents. Unfortunately, this seems to be the intention of the NPPF. We do not want to see our modest riverside town swamped by high tower blocks, but almost all the housing allocation densities are higher than is suitable for their locations.

The Strategic Flood Risk Assessment demonstrates what an extreme position the housing target is pushing us into. Many of the suggested housing allocation sites are in locations at risk of flooding, and would not be considered at all if we were not under such pressure. 18 of the proposed sites require application of the Exception Test and rigorous management, e.g. no housing on ground floor, to justify their inclusion, and 9 more sites may be at more risk in future, one of which is deemed impossible to make safe. This is not just an academic exercise, as large parts of Staines were flooded in 2013-4. The Environment Agency's Lower Thames Relief Plan, if it ever gets sufficient funding, will establish relief channels upstream and downstream from Staines but provide little relief to the town itself.

We therefore find much of the Plan to be unsound because the significant adverse effects on the borough cannot be justified. We comment below on outstanding examples of weak policies and damaging site proposals.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Anne Damerell (19552033)</b>	
<b>Organisation: Staines Town Society</b>	
<b>Response ID: 1126206</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: We find much of the Plan to be unsound because the significant adverse effects on the Borough cannot be justified.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
The policies in support of the 2022 local plan have weakened the opportunity to require considerations fundamental to good development and design by using wording such as “will be expected” or “should be” rather than “must be” and have lost the refusal of permission clauses that are included in the current policies.	
<b>Question 6: You can upload any modifications below.</b>	
STS response to Local Plan Sep 22_ page 2ff.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/608270/PDF/-/STS%20response%20to%20Local%20Plan%20Sep%202022%5F%20page%202ff%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/608270/PDF/-/STS%20response%20to%20Local%20Plan%20Sep%202022%5F%20page%202ff%2Epdf</a>	



<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Anne Damerell (19552033)</b>
<b>Organisation: Staines Town Society</b>

<b>Response ID: 1119660</b>	
<b>Policy / Evidence Base / Part of Plan: Policy PS1: Responding to the climate emergency</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: We find much of the Plan to be unsound because of the significant adverse on the Borough cannot be justified.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
The policies in support of the 2022 local plan have weakened the opportunity to require considerations fundamental to good development and design by using wording such as “will be expected” or “should be” rather than “must be” and have lost the refusal of permission clauses that are included in the current policies. Staines Town Society consider it imperative that some of the new policy statements should be amended as follows : PS1.6b : applications <b>MUST</b> be accompanied by Construction Management Plans, which seek to manage the impact of construction traffic on the local and strategic transport networks. Trees Climate Change cannot be ignored and yet there is no reference to Tree	



Protection. Trees are vital to flood protection and there are no plans for flood proofing in the town centre, yet allocations for over 4000 new builds. PS1 references “avoid the loss of trees”, PS2 includes “incorporate street trees” and PS3 references “Tree preservation orders”. The wording of current policy EN8 must be included “refusing permission where development would have a significant harmful impact on the landscape or features of nature conservation value” and reference made to Tree Protection in the new policy E4 : Environmental Protection.

**Question 6:** You can upload any modifications below.

STS response to Local Plan Sep 22, page 2ff.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589737/PDF/-/STS%20response%20to%20Local%20Plan%20Sep%202022%5F%20page%202ff%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Anne Damerell (19552033)</b>
<b>Organisation: Staines Town Society</b>

<b>Response ID: 1119663</b>
<b>Policy / Evidence Base / Part of Plan: Policy PS2: Designing places and spaces</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: We find much of the Plan to be unsound because the significant adverse effects on the Borough cannot be justified.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
The policies in support of the 2022 local plan have weakened the opportunity to require considerations fundamental to good development and design by using wording such as “will be expected” or “should be” rather than “must be” and have lost the refusal of permission clauses that are included in the current policies. Staines Town Society consider it imperative that some of the new policy statements should be amended as follows: PS2: Landscaping : All new development <b>MUST</b> avoid the loss of trees and other vegetation worthy of retention. PS2: Public Realm 5) All development proposals <b>MUST</b> seek to positively impact the public realm Trees Climate Change cannot be ignored and yet there is no reference to Tree

Protection. Trees are vital to flood protection and there are no plans for flood proofing in the town centre, yet allocations for over 4000 new builds. PS1 references “avoid the loss of trees”, PS2 includes “incorporate street trees” and PS3 references “Tree preservation orders”. The wording of current policy EN8 must be included “refusing permission where development would have a significant harmful impact on the landscape or features of nature conservation value” and reference made to Tree Protection in the new policy E4 : Environmental Protection. PS2 5 (b): ensure that public realm is well-designed, safe, - add secure in which opportunities for crime are minimised. Please see attached document.

**Question 6:** You can upload any modifications below.

STS response to Local Plan Sep 22, page 2ff.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589738/PDF/-/STS%20response%20to%20Local%20Plan%20Sep%202022%5F%20page%202ff%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Anne Damerell (19552033)</b>
<b>Organisation: Staines Town Society</b>

<b>Response ID: 1119664</b>	
<b>Policy / Evidence Base / Part of Plan: Policy PS3: Heritage, Conservation and Landscape</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: We find much of the Plan to be unsound because the significant adverse effects on the Borough cannot be justified.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
The policies in support of the 2022 local plan have weakened the opportunity to require considerations fundamental to good development and design by using wording such as “will be expected” or “should be” rather than “must be” and have lost the refusal of permission clauses that are included in the current policies. Staines Town Society consider it imperative that some of the new policy statements should be amended as follows: PS3 : Heritage 4). The new policy says “considerable weight will be given to the protection of a listed building ....” We consider the much stronger wording in current policy EN5 should be reinstated to refuse consent and recognise locally listed buildings - to read “REFUSING consent for any alteration or extension to a listed and locally listed building that will not preserve the building or its setting”	

Trees Climate Change cannot be ignored and yet there is no reference to Tree Protection. Trees are vital to flood protection and there are no plans for flood proofing in the town centre, yet allocations for over 4000 new builds. PS1 references “avoid the loss of trees”, PS2 includes “incorporate street trees” and PS3 references “Tree preservation orders”. The wording of current policy EN8 must be included “refusing permission where development would have a significant harmful impact on the landscape or features of nature conservation value” and reference made to Tree Protection in the new policy E4 : Environmental Protection. Please see attached document.

**Question 6:** You can upload any modifications below.

STS response to Local Plan Sep 22, page 2ff.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589739/PDF/-/STS%20response%20to%20Local%20Plan%20Sep%202022%5F%20page%202ff%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Anne Damerell (19552033)</b>
<b>Organisation: Staines Town Society</b>

<b>Response ID: 1119667</b>
<b>Policy / Evidence Base / Part of Plan: Policy SP4: Green Belt</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: We find much of the Plan to be unsound because the significant adverse effects on the Borough cannot be justified.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
The policies in support of the 2022 local plan have weakened the opportunity to require considerations fundamental to good development and design by using wording such as “will be expected” or “should be” rather than “must be” and have lost the refusal of permission clauses that are included in the current policies. Staines Town Society consider it imperative that some of the new policy statements should be amended as follows: SP4 :b - replacement and extension of building in the Green Belt. The new policy reads “is not materially larger than the one it replaces”. The wording of the current policy reads “does not significantly change the scale of the original building, regardless of the size of the plot”. Referencing the original

building ensures that “scope creep” extension by extension is avoided and the original building footprint is maintained. Original building wording is needed rather than “the one it replaces”.  
See attached document.

**Question 6:** You can upload any modifications below.

STS response to Local Plan Sep 22, page 2ff.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589740/PDF/-/STS%20response%20to%20Local%20Plan%20Sep%2022%5F%20page%20ff%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Anne Damerell (19552033)</b>
<b>Organisation: Staines Town Society</b>

<b>Response ID: 1119697</b>	
<b>Policy / Evidence Base / Part of Plan: Policy SP6: River Thames and its Tributaries</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: We find much of the Plan to be unsound because the significant adverse effects on the Borough cannot be justified.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
SP6 - River Thames. We consider that there should be reference to Water Quality which is now included in policy E4.	
CONCLUSION	
Staines is wholly unsuited to this proposed vast increase in density of population and we will not be creating an affordable, quality environment for those who live here or want to live here in the future, for many reasons including:-	
a). Large areas of surface water & propensity to flooding - rivers, reservoirs & gravel pits. Staines has been side-lined by the government & Environment Agency with regard to flood alleviation, which with climate change, must now be taken seriously and putting commercial premises at ground floor level does not provide a sensible solution.	



Please attached document.

**Question 6:** You can upload any modifications below.

STS response to Local Plan Sep 22, page 2ff.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589792/PDF/-/STS%20response%20to%20Local%20Plan%20Sep%202022%5F%20page%202ff%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Anne Damerell (19552033)</b>	
<b>Organisation: Staines Town Society</b>	
<b>Response ID: 1119730</b>	
<b>Policy / Evidence Base / Part of Plan: Policy SP7: Heathrow Airport</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: We find much of the Plan to be unsound because the significant adverse effects on the Borough cannot be justified.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
With regard to new policies, we have the following comments: SP7: It is not in Staines interest to encourage Heathrow 'expansion, as our references on Transport make clear. Please see attached document.	
<b>Question 6: You can upload any modifications below.</b>	
STS response to Local Plan Sep 22, page 2ff.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589918/PDF/-/STS%20response%20to%20Local%20Plan%20Sep%202022%5F%20page%202ff%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589918/PDF/-/STS%20response%20to%20Local%20Plan%20Sep%202022%5F%20page%202ff%2Epdf</a>	



<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Anne Damerell (19552033)</b>	
<b>Organisation: Staines Town Society</b>	
<b>Response ID: 1119682</b>	
<b>Policy / Evidence Base / Part of Plan: Policy H1: Homes for All</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: We find much of the Plan to be unsound because the significant adverse effects on the Borough cannot be justified.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
The policies in support of the 2022 local plan have weakened the opportunity to require considerations fundamental to good development and design by using wording such as “will be expected” or “should be” rather than “must be” and have lost the refusal of permission clauses that are included in the current policies. Staines Town Society consider it imperative that some of the new policy statements should be amended as follows: H1 : Accessible Homes 8©: reads “Unless it can be demonstrated that it is unfeasible to do so, the Borough Council will require a minimum of 10% of new dwellings on major housing developments to accord with Category M4(3) (wheelchair adaptability). “	

We consider a percentage of new dwellings should be wheelchair adapted, complying with M4(3) (2)(b), at build-time, so that users can move in without further expense. The policy should also require adaptations for sensory disabilities, such as Braille notices and lift buttons, and contrasting colours of walls/floors/doors in public areas to assist people with partial vision, and visual fire alarms. Developments must provide a practical, safe suitable means of entry and escape for people with physical and sensory disabilities. Please see attached document.

**Question 6:** You can upload any modifications below.

STS response to Local Plan Sep 22, page 2ff.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589753/PDF/-/STS%20response%20to%20Local%20Plan%20Sep%202022%5F%20page%202ff%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Anne Damerell (19552033)</b>
<b>Organisation: Staines Town Society</b>

<b>Response ID: 1119674</b>	
<b>Policy / Evidence Base / Part of Plan: Policy E4: Environmental Protection</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: We find much of the Plan to be unsound because the significant adverse effects on the Borough cannot be justified.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
The policies in support of the 2022 local plan have weakened the opportunity to require considerations fundamental to good development and design by using wording such as “will be expected” or “should be” rather than “must be” and have lost the refusal of permission clauses that are included in the current policies.	
Staines Town Society consider it imperative that some of the new policy statements should be amended as follows:	
E4 : Air Quality The Air Quality statement under E4, reads “prevent further deterioration of existing poor air quality ..... as far as reasonable practicable” . What is “reasonably practicable” and how will that judgement be made? The wording needs to be much stronger - e.g. development will be refused if unable to demonstrate that air quality will not deteriorate.	

E4: Environmental Protection - Light : Planning permission will not be granted for light generating development proposals that may have an adverse impact on residential developments, amenity, wildlife, biodiversity - add and public safety, which is critical given the high rise density and lack of open space.

**CONCLUSION**

Staines is wholly unsuited to this proposed vast increase in density of population and we will not be creating an affordable, quality environment for those who live here or want to live here in the future, for many reasons including:-

b). Above in the air - due to low aircraft on take-off from nearby Heathrow.

Please see attached document.

**Question 6:** You can upload any modifications below.

STS response to Local Plan Sep 22, page 2ff.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589742/PDF/-/STS%20response%20to%20Local%20Plan%20Sep%202022%5F%20page%202ff%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Anne Damerell (19552033)</b>
<b>Organisation: Staines Town Society</b>

<b>Response ID: 1119679</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ID1: Infrastructure and Delivery</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: We find much of the Plan to be unsound because the significant adverse effects on the Borough cannot be justified.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
The policies in support of the 2022 local plan have weakened the opportunity to require considerations fundamental to good development and design by using wording such as “will be expected” or “should be” rather than “must be” and have lost the refusal of permission clauses that are included in the current policies. Staines Town Society consider it imperative that some of the new policy statements should be amended as follows: ID1: Infrastructure and Delivery 8): reads “Development proposals which rely on the delivery of critical infrastructure projects to support the development, will only be permitted prior to completion of that project or where appropriate, a phase of that project which has been identified as	



necessary, where the council is content that the infrastructure or phase of that infrastructure will be in place within a reasonable timetable from the date of permission.”

How does the council determine it is “content” and what is a “reasonable timetable”. ? Given the enormous size of the proposed developments (increased population) , we believe it is imperative that the policy states that development will NOT BE PERMITTED prior to critical infrastructure completion. Any delay will cause extreme disruption to the increased population.

Critical infrastructure extends beyond Spelthorne Council to include Surrey Highways, SCC Education, South Western Railways and utility companies. It is not clear how the important infrastructure requirements beyond Spelthorne control will be planned and managed prior to development beginning.

Please see attached document.

**Question 6:** You can upload any modifications below.

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<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589748/PDF/-/STS%20response%20to%20Local%20Plan%20Sep%2022%5F%20page%202ff%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Anne Damerell (19552033)</b>	
<b>Organisation: Staines Town Society</b>	
<b>Response ID: 1119687</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ID2: Sustainable Transport for New Developments</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: We find much of the Plan to be unsound because the significant adverse effects on the Borough cannot be justified.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
The policies in support of the 2022 local plan have weakened the opportunity to require considerations fundamental to good development and design by using wording such as “will be expected” or “should be” rather than “must be” and have lost the refusal of permission clauses that are included in the current policies. Staines Town Society consider it imperative that some of the new policy statements should be amended as follows: ID2: Sustainable Transport for New Developments: - Car parking provision seems to have been lost. It is essential to include adequate car parking provision for disabled, service and delivery van parking at any new development or change of use development.	
CONCLUSION	

Staines is wholly unsuited to this proposed vast increase in density of population and we will not be creating an affordable, quality environment for those who live here or want to live here in the future, for many reasons including:-

c). The public transport network serving Staines is at best, extremely limited and will quickly become totally inadequate.

Further comments on Transport

We are extremely concerned about the traffic flows and volumes through Staines Town and surrounding roads. The recent increase in the number of traffic accidents on the M25 on or near the Staines and M3 junctions brings the traffic flooding through onto our local roads and eventually to a complete standstill. Indeed this is something that is acknowledged, as the Staines Development Framework document states:

“Staines upon Thames town centre is located in very close proximity to the strategic route network, in particular the M25 and M3. Any changes to this network could have direct impacts on traffic movements into and through the town centre with significant consequences for Placemaking as a result”.

Any reduction in traffic flow will be dependent on a well-functioning rail, bus and cycle network, but this is not in Spelthorne’s gift to deliver and is unlikely to happen during the Local Plan delivery timetable. Again, as acknowledged in the Staines Development Framework document,

“the level of quality of provision of public transport into and through Staines upon Thames town centre is a key factor in its future success” .. but... “has no direct control over this provision now or in the future”.

Despite this, the traffic assessment for Spelthorne Local Plan is being based on a model which is 8 years old and only considers traffic flows at morning and evening peak hours. The days of peak hour traffic have gone with the introduction of hybrid working and the increase in online deliveries. Given the changing traffic flows - cars, freight and delivery vans, motorbikes and scooters – the discrepancies and caveats included in the Highways Assessment report are extremely worrying.

The Spelthorne Local Plan Strategic Highways Assessment Report : Technical Annex supporting the local plan has been prepared on a baseline as at 2014 and includes observed data of eight and more years old (ref. 3.4.1) The traffic modelling is underestimating the total of traffic and journey times as against those observed - indeed, of the 36 locations from The Causeway to Staines ByPass, the model underestimates around 25 of them (ref tables 8.1 and 8.2).

Please see attached document for related table and further in depth rep.

**Question 6:** You can upload any modifications below.

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<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589772/PDF/-/STS%20response%20to%20Local%20Plan%20Sep%202022%5F%20page%202ff%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Anne Damerell (19552033)</b>
<b>Organisation: Staines Town Society</b>

<b>Response ID: 1119732</b>	
<b>Policy / Evidence Base / Part of Plan: ST1/037 (Thameside House, South Street)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: We find much of the Plan to be unsound because the significant adverse effects on the Borough cannot be justified.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
<p>Allocations</p> <p>Staines is a low-level former market town which experienced serious flooding in 2002 and 2014 and faces an increased risk of flooding as climate changes. The grouping together of so many high-rise tower blocks at Debenhams, Thames Side House, Bridge Street car park, Masonic Lodge etc will cause problems for the local community, with their inherent unsuitability for families and the increasing proportion of older people, and extreme difficulties in the next period of flooding.</p> <p>Surrey Insight shows that Spelthorne has the worst of the unemployment, mental health and obesity issues of Surrey - populating Staines with high rise developments is not going to address the open space, community living requirements that can improve mental and physical well-being.</p>	

Additionally the delivery plan document states quite clearly that there is a high risk of the affordable housing requirements not being met as a result of cost vs profit for high rise.

Thames Side House ST1/037

This location is too close to the river for a block accommodating 140 units, which would require at least an 8 storey tower. A maximum of 5 storeys would be far more appropriate and provide for a more gradual increase in height of the towers from the river to the taller blocks in the town centre.

**Question 6:** You can upload any modifications below.

STS response to Local Plan Sep 22, page 2ff.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589920/PDF/-/STS%20response%20to%20Local%20Plan%20Sep%202022%5F%20page%202ff%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Anne Damerell (19552033)</b>
<b>Organisation: Staines Town Society</b>

<b>Response ID: 1119733</b>	
<b>Policy / Evidence Base / Part of Plan: ST3/004 (Oast House, Kingston Road)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: We find much of the Plan to be unsound because the significant adverse effects on the Borough cannot be justified.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
<p>Allocations</p> <p>Staines is a low-level former market town which experienced serious flooding in 2002 and 2014 and faces an increased risk of flooding as climate changes. The grouping together of so many high-rise tower blocks at Debenhams, Thames Side House, Bridge Street car park, Masonic Lodge etc will cause problems for the local community, with their inherent unsuitability for families and the increasing proportion of older people, and extreme difficulties in the next period of flooding.</p> <p>Surrey Insight shows that Spelthorne has the worst of the unemployment, mental health and obesity issues of Surrey - populating Staines with high rise developments is not going to address the open space, community living requirements that can improve mental and physical well-being.</p>	

Additionally the delivery plan document states quite clearly that there is a high risk of the affordable housing requirements not being met as a result of cost vs profit for high rise.

Oast House ST3/004

A good site for much needed new health centre facilities. The listed building should not be swamped by high blocks. We regret the proposed demolition of the rest of the brewery complex, one of few remaining in SE England.

**Question 6:** You can upload any modifications below.

STS response to Local Plan Sep 22, page 2ff.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589924/PDF/-/STS%20response%20to%20Local%20Plan%20Sep%202022%5F%20page%202ff%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Anne Damerell (19552033)</b>
<b>Organisation: Staines Town Society</b>

<b>Response ID: 1119735</b>	
<b>Policy / Evidence Base / Part of Plan: ST4/002 (Bridge Street Car Park, Hanover House &amp; Sea Cadet Building, Bridge Street, Staines)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: We find much of the Plan to be unsound because the significant adverse effects on the Borough cannot be justified.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
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<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
<p>Allocations</p> <p>Staines is a low-level former market town which experienced serious flooding in 2002 and 2014 and faces an increased risk of flooding as climate changes. The grouping together of so many high-rise tower blocks at Debenhams, Thames Side House, Bridge Street car park, Masonic Lodge etc will cause problems for the local community, with their inherent unsuitability for families and the increasing proportion of older people, and extreme difficulties in the next period of flooding.</p> <p>Surrey Insight shows that Spelthorne has the worst of the unemployment, mental health and obesity issues of Surrey - populating Staines with high rise developments is not going to address the open space, community living requirements that can improve mental and physical well-being.</p>	

Additionally the delivery plan document states quite clearly that there is a high risk of the affordable housing requirements not being met as a result of cost vs profit for high rise.

Bridge Street Car Park ST4/002

This small yet contentious site has long been the subject of much local concern, due to its position adjacent to the Listed Staines Bridge, on the riverside and in the Conservation Area. We would welcome a reduction in size and height, along with protection by virtue of its location, at the gateway to the town. When the Bridge Street car park was built it was deliberately kept at a level just below the parapet of Staines Bridge, the idea being to maintain the protected view from the Listed bridge to the Listed Brewery Tower and the Listed St Mary's Church tower. This will be irretrievably lost.

**Question 6:** You can upload any modifications below.

STS response to Local Plan Sep 22, page 2ff.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589926/PDF/-/STS%20response%20to%20Local%20Plan%20Sep%202022%5F%20page%20ff%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Anne Damerell (19552033)</b>
<b>Organisation: Staines Town Society</b>

<b>Response ID: 1119737</b>	
<b>Policy / Evidence Base / Part of Plan: ST4/019 (Former Debenhams Site, High Street)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: We find much of the Plan to be unsound because the significant adverse effects on the Borough cannot be justified.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
<p>Allocations</p> <p>Staines is a low-level former market town which experienced serious flooding in 2002 and 2014 and faces an increased risk of flooding as climate changes. The grouping together of so many high-rise tower blocks at Debenhams, Thames Side House, Bridge Street car park, Masonic Lodge etc will cause problems for the local community, with their inherent unsuitability for families and the increasing proportion of older people, and extreme difficulties in the next period of flooding.</p> <p>Surrey Insight shows that Spelthorne has the worst of the unemployment, mental health and obesity issues of Surrey - populating Staines with high rise developments is not going to address the open space, community living requirements that can improve mental and physical well-being.</p>	

Additionally the delivery plan document states quite clearly that there is a high risk of the affordable housing requirements not being met as a result of cost vs profit for high rise.

Debenhams ST4/019

It is close to the river and within the Conservation Area; a much loved and iconic building. The retention of the delightful, sweeping curves of the Debenhams building in Staines, is paramount, we cannot begin to imagine its loss or the idea of it being replaced by a tower accommodating a high density block of 226 dwellings. This would wipe out any hope of keeping a lower-level area near the river.

**Question 6:** You can upload any modifications below.

STS response to Local Plan Sep 22, page 2ff.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589935/PDF/-/STS%20response%20to%20Local%20Plan%20Sep%2022%5F%20page%202ff%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Anne Damerell (19552033)</b>
<b>Organisation: Staines Town Society</b>

<b>Response ID: 1119738</b>	
<b>Policy / Evidence Base / Part of Plan: ST4/004 (96-104 Church Street, Staines)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: We find much of the Plan to be unsound because the significant adverse effects on the Borough cannot be justified.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
<p>Allocations</p> <p>Staines is a low-level former market town which experienced serious flooding in 2002 and 2014 and faces an increased risk of flooding as climate changes. The grouping together of so many high-rise tower blocks at Debenhams, Thames Side House, Bridge Street car park, Masonic Lodge etc will cause problems for the local community, with their inherent unsuitability for families and the increasing proportion of older people, and extreme difficulties in the next period of flooding.</p> <p>Surrey Insight shows that Spelthorne has the worst of the unemployment, mental health and obesity issues of Surrey - populating Staines with high rise developments is not going to address the open space, community living requirements that can improve mental and physical well-being.</p>	

Additionally the delivery plan document states quite clearly that there is a high risk of the affordable housing requirements not being met as a result of cost vs profit for high rise.

96 - 104 Church Street ST4/004

We welcome the change to housing, but not so much of it. An increase to the proposed number of flats on this site is inappropriate and simply cannot be justified within the Conservation Area and near the river.

**Question 6:** You can upload any modifications below.

STS response to Local Plan Sep 22, page 2ff.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589937/PDF/-/STS%20response%20to%20Local%20Plan%20Sep%202022%5F%20page%202ff%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Anne Damerell (19552033)</b>
<b>Organisation: Staines Town Society</b>

<b>Response ID: 1119745</b>	
<b>Policy / Evidence Base / Part of Plan: ST4/O10 (Riverside car park, Thames Street, Staines)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: We find much of the Plan to be unsound because the significant adverse effects on the Borough cannot be justified.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
<p>Allocations</p> <p>Staines is a low-level former market town which experienced serious flooding in 2002 and 2014 and faces an increased risk of flooding as climate changes. The grouping together of so many high-rise tower blocks at Debenhams, Thames Side House, Bridge Street car park, Masonic Lodge etc will cause problems for the local community, with their inherent unsuitability for families and the increasing proportion of older people, and extreme difficulties in the next period of flooding.</p> <p>Surrey Insight shows that Spelthorne has the worst of the unemployment, mental health and obesity issues of Surrey - populating Staines with high rise developments is not going to address the open space, community living requirements that can improve mental and physical well-being.</p>	

Additionally the delivery plan document states quite clearly that there is a high risk of the affordable housing requirements not being met as a result of cost vs profit for high rise.

Memorial Gardens and Riverside Car Park ST4/010

This riverside area is especially valuable and totally unsuited to any future development, the gardens are already a much valued green space and will become more so in the future, when there will be many more residents in Staines living in the tiny flats and requiring an outdoor area. It would be more appropriate, while there is an opportunity, to utilise the whole of the current car park area to provide additional grassland, children's play area, public conveniences and a cafe.

The suggestion that overlooking flats built on the current car park location will make the park safer is unfounded; overlooking does not curb the current vandalism or bad behaviour, which takes place in front of houses along the towpath and very often in broad daylight. This area between Thames Street and the river should be open green space, not built on.

The Memorial Gardens are popular at weekends, well used during the week by mothers with babies/toddlers, retirees and at lunchtime, those working nearby. The gardens could instead be much improved by the addition of a dedicated play area for younger children, public conveniences and a cafe.

**Question 6:** You can upload any modifications below.

STS response to Local Plan Sep 22, page 2ff.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589956/PDF/-/STS%20response%20to%20Local%20Plan%20Sep%202022%5F%20page%202ff%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Anne Damerell (19552033)</b>
<b>Organisation: Staines Town Society</b>

<b>Response ID: 1119749</b>	
<b>Policy / Evidence Base / Part of Plan: ST4/O11 (Thames Lodge Hotel, Thames Street, Staines)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: We find much of the Plan to be unsound because the significant adverse effects on the Borough cannot be justified.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
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<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
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Additionally the delivery plan document states quite clearly that there is a high risk of the affordable housing requirements not being met as a result of cost vs profit for high rise.

Thames Lodge Hotel ST4/011

The Staines Town Society believe a reduced height of 3 storeys, would be much more appropriate here. This site is located on a narrow strip of river frontage, included in Staines Development Framework "Riverside Protection zone" and the height must be retained at the existing level to respect the riverside character and new zoning.

The river is narrow at Staines and does not lend itself to the taller blocks of flats found in places further downstream (e.g. Richmond- Upon-Thames) where there is a much wider, open aspect to either side of the river and the taller buildings have been set back from the water leaving more acceptable open space on the river frontage.

**Question 6:** You can upload any modifications below.

STS response to Local Plan Sep 22, page 2ff.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589957/PDF/-/STS%20response%20to%20Local%20Plan%20Sep%202022%5F%20page%202ff%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Anne Damerell (19552033)</b>	
<b>Organisation: Staines Town Society</b>	
<b>Response ID: 1119750</b>	
<b>Policy / Evidence Base / Part of Plan: ST4/023 (Two Rivers Retail Park Terrace, Mustard Mill Road, Staines)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: We find much of the Plan to be unsound because the significant adverse effects on the Borough cannot be justified.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not effective	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
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<p>Allocations</p> <p>Staines is a low-level former market town which experienced serious flooding in 2002 and 2014 and faces an increased risk of flooding as climate changes. The grouping together of so many high-rise tower blocks at Debenhams, Thames Side House, Bridge Street car park, Masonic Lodge etc will cause problems for the local community, with their inherent unsuitability for families and the increasing proportion of older people, and extreme difficulties in the next period of flooding.</p> <p>Surrey Insight shows that Spelthorne has the worst of the unemployment, mental health and obesity issues of Surrey - populating Staines with high rise developments is not going to address the open space, community living requirements that can improve mental and physical well-being.</p>	

Additionally the delivery plan document states quite clearly that there is a high risk of the affordable housing requirements not being met as a result of cost vs profit for high rise.

Two Rivers ST4/023

This site is somewhat less central and perhaps a better site for a high density living, however it is adjacent to Staines Moor and the Staines Town Society have some concerns regarding effect of such a large development on the wildlife and bio-diversity of this SSSI, which is already blighted by the continuous drone of traffic from the M25 and noisy, low flying aircraft.

**Question 6:** You can upload any modifications below.

STS response to Local Plan Sep 22, page 2ff.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589962/PDF/-/STS%20response%20to%20Local%20Plan%20Sep%202022%5F%20page%202ff%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Anne Damerell (19552033)</b>	
<b>Organisation: Staines Town Society</b>	
<b>Response ID: 1119751</b>	
<b>Policy / Evidence Base / Part of Plan: ST4/024 (Frankie &amp; Benny's/Travelodge, Two Rivers, Hale Street, Staines)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: We find much of the Plan to be unsound because the significant adverse effects on the Borough cannot be justified.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
<p>Allocations</p> <p>Staines is a low-level former market town which experienced serious flooding in 2002 and 2014 and faces an increased risk of flooding as climate changes. The grouping together of so many high-rise tower blocks at Debenhams, Thames Side House, Bridge Street car park, Masonic Lodge etc will cause problems for the local community, with their inherent unsuitability for families and the increasing proportion of older people, and extreme difficulties in the next period of flooding.</p> <p>Surrey Insight shows that Spelthorne has the worst of the unemployment, mental health and obesity issues of Surrey - populating Staines with high rise developments is not going to address the open space, community living requirements that can improve mental and physical well-being.</p>	

Additionally the delivery plan document states quite clearly that there is a high risk of the affordable housing requirements not being met as a result of cost vs profit for high rise.

Travel Lodge/Frankie & Benny's ST4/024

Again, an 8 storey block is too high in an area so close to the riverside zone and adjacent to the Conservation Area.

**Question 6:** You can upload any modifications below.

STS response to Local Plan Sep 22, page 2ff.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589963/PDF/-/STS%20response%20to%20Local%20Plan%20Sep%2022%5F%20page%202ff%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Anne Damerell (19552033)</b>
<b>Organisation: Staines Town Society</b>

<b>Response ID: 1119754</b>	
<b>Policy / Evidence Base / Part of Plan: ST2/006 (Builders Yard, Gresham Road)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: We find much of the Plan to be unsound because the significant adverse effects on the Borough cannot be justified.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
<p>Allocations</p> <p>Staines is a low-level former market town which experienced serious flooding in 2002 and 2014 and faces an increased risk of flooding as climate changes. The grouping together of so many high-rise tower blocks at Debenhams, Thames Side House, Bridge Street car park, Masonic Lodge etc will cause problems for the local community, with their inherent unsuitability for families and the increasing proportion of older people, and extreme difficulties in the next period of flooding.</p> <p>Surrey Insight shows that Spelthorne has the worst of the unemployment, mental health and obesity issues of Surrey - populating Staines with high rise developments is not going to address the open space, community living requirements that can improve mental and physical well-being.</p>	

Additionally the delivery plan document states quite clearly that there is a high risk of the affordable housing requirements not being met as a result of cost vs profit for high rise.

Hy-Ten/Jewsons site ST2/006

This is an area where local residents have been long disturbed by the noise of the commercial activity and we welcome housing here, but would prefer less of it. The location is on the other side of the railway line and not in the immediate vicinity of the other town centre tower blocks, and a tower of 13-15 storeys, in the middle of a Victorian residential area, will be more than a little incongruous. However, we are unable to provide an alternative solution.

**Question 6:** You can upload any modifications below.

STS response to Local Plan Sep 22, page 2ff.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589967/PDF/-/STS%20response%20to%20Local%20Plan%20Sep%202022%5F%20page%202ff%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Anne Damerell (19552033)</b>
<b>Organisation: Staines Town Society</b>

<b>Response ID: 1119755</b>
<b>Policy / Evidence Base / Part of Plan: ST4/009 (Elmsleigh Centre and Adjoining Land, South Street)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: We find much of the Plan to be unsound because the significant adverse effects on the Borough cannot be justified.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
<p>Allocations</p> <p>Staines is a low-level former market town which experienced serious flooding in 2002 and 2014 and faces an increased risk of flooding as climate changes. The A2Dominion Grouping together of so many high-rise tower blocks at Debenhams, Thames Side House, Bridge Street car park, Masonic Lodge etc will cause problems for the local community, with their inherent unsuitability for families and the increasing proportion of older people, and extreme difficulties in the next period of flooding.</p> <p>Surrey Insight shows that Spelthorne has the worst of the unemployment, mental health and obesity issues of Surrey - populating Staines with high rise developments is not going to address the open space, community living requirements that can improve mental and physical well-being.</p>

Additionally the delivery plan document states quite clearly that there is a high risk of the affordable housing requirements not being met as a result of cost vs profit for high rise.

Elmsleigh Centre ST4/009

Whilst the Staines Town Society accept that the government requires housing and we know it has to go somewhere, we are opposed to the proposal for 850 dwellings on this relatively small site. The sheer increase in population could cause significant harm to the well-being of both the inhabitants of the tower blocks and other local residents. It may mean as many as 1500 additional people living in this confined area. Constrained in height, by aircraft safety limits, these flats will inevitably be the smallest permitted. Even so, these flats will be unaffordable to most local young people looking to set up home in Spelthorne and are far more likely to end up accommodating those moving away from London, because they can no longer afford London prices.

**Question 6:** You can upload any modifications below.

STS response to Local Plan Sep 22, page 2ff.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589972/PDF/-/STS%20response%20to%20Local%20Plan%20Sep%202022%5F%20page%202ff%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Mary Dawkins (41421249)</b>
<b>Organisation:</b>

<b>Response ID: 1124070</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Green Belt Sunbury Common Grovley Road I understand that once again the field at the Running Horse is under threat from developers. This is outrageous! This field is precious. It is not manicured like a playing field or a golf course it is a field, a real field, growing real crops or real weeds (wild flowers) in an urban environment how more precious can you get I was fortunate enough to have been brought up on a farm but this precious resource is the closest thing to genuine countryside that a lot of children will get. There are generations of children growing up thinking cereal grows in boxes, beans in tins and the countryside is something brought into your front room on the tele on Sunday mornings! I thought the other day that if there were a nuclear war what in Sunbury Common would be worth saving, it was a short list: the Victorian Clock at Sunbury Cross, the figure of Christ on the wall of St Saviour's Church and the field at the Running Horse. Living in Sunbury Common we have very little identity of our own and if we lose the Running Horse we will have none, we will just become another victim

of urban Sprawl. Sunbury Village seems to be fireproof, they have so many things worth saving. Alas for poor Sunbury Common. I recently returned from a seaside holiday where what looked like a perfectly ordinary set of sand dunes were labeled an SSI. Things that look perfectly ordinary can sometimes be the most precious. Please don't build on this wonderful resource.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Dominic De Lord (41656609)</b>
<b>Organisation:</b>

<b>Response ID: 1124594</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
<ol style="list-style-type: none"> <li>1. It will destroy the Green Belt</li> <li>2. It will increase traffic on Staines Road East</li> <li>3. It will increase CO2 emissions (caused by more traffic)</li> <li>4. It will put extra pressure of already overloaded infra-structure</li> <li>5. It will cause an extra flooding risk</li> <li>6. It will change the character of the surrounding area</li> <li>7. Currently, there are not enough GPs for the existing population</li> <li>8. Currently, there are not enough school places</li> <li>9. Sunbury will lose a large and popular function venue</li> <li>10. Losing the racecourse, will result in a loss of jobs for the local community</li> </ol>

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Raman Dhingra (42010113)</b>	
<b>Organisation:</b>	
<b>Response ID: 1125966</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>Kindly note I, Raman Dhingra, resident of Stanwell (Spelthorne Council) reject and oppose the council's decision to release green spaces for the developments.</p> <p>This will have a long term impact on our future generations and we strongly recommend that the council/council officials should protect the green belt areas.</p> <p>We also came to know that Council has also refused to designate 19 Green Belt areas (that were proposed by residents) as Local Green spaces. We are so disappointed that the councillors or appointed members of council ignored public recommendations to protect and preserve the green belt. We ask to reverse your decision to refuse to protect the green belt.</p> <p>Looking forward to active action from the council officials.</p>	

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Raman Dhingra (42010113)</b>
<b>Organisation:</b>

<b>Response ID: 1117498</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Kindly note I, Raman Dhingra, resident of Stanwell (Spelthorne Council) reject and oppose the council’s decision to release green spaces for the developments. This will have a long term impact on our future generations and we strongly recommend that the council/council officials should protect the green belt areas. We also came to know that Council has also refused to designate 19 Green Belt areas (that were proposed by residents) as Local Green spaces. We are so disappointed that the councillors or appointed members of council ignored public recommendations to protect and preserve the green belt. We ask to reverse your decision to refuse to protect the green belt. Looking forward to active action from the council officials.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Raman Dhingra (42010113)</b>
<b>Organisation:</b>

<b>Response ID: 1125958</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Kindly note I, Raman Dhingra, resident of Stanwell (Spelthorne Council) reject and oppose the council’s decision to release green spaces for the developments. This will have a long term impact on our future generations and we strongly recommend that the council/council officials should protect the green belt areas. We also came to know that Council has also refused to designate 19 Green Belt areas (that were proposed by residents) as Local Green spaces. We are so disappointed that the councillors or appointed members of council ignored public recommendations to protect and preserve the green belt. We ask to reverse your decision to refuse to protect the green belt. Looking forward to active action from the council officials.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Helen di Paolo (41983937)</b>	
<b>Organisation:</b>	
<b>Response ID: 1124259</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>I am writing to express my extreme disappointment that Spelthorne Council is proposing to release more than 24 hectares of Green Belt land for development, and to request that ALL Green Belt land remains protected.</p> <p>I strongly oppose the council's rejection of 41 sites - which include school playing fields, sports grounds, allotments, Green Belt areas and other protected urban open spaces (PUOS) - for official protection from development,</p> <p>This is a request for the Council to protect as Local Green Spaces all the remaining PUOS that are still in existence, including school playing fields, private sports grounds, allotments, the Staines Reservoir Aqueduct, Stanwell Quarry, Duncroft, Wraysbury Road in Staines, the Grounds of Sunbury Court and Spelthorne Grove in Ashford.</p>	

This is also a request to reverse the decision not to protect the 19 Green Belt areas which were proposed by residents as Local Green spaces due to their particular importance to the community.

At a time when we are facing a global climate crisis, not to mention increasing problems with mental health and obesity, it is essential to protect the few green spaces we have left in Spelthorne. It is widely proven that access to green space improves quality of life for people on many levels. Equally importantly, green spaces act as carbon sinks, mitigate flooding, provide a habitat for wildlife, and help reduce temperatures during heat waves.

There is already a dire shortage of green space in Spelthorne. There are numerous new housing developments which have been built without any consideration being given to the supporting infrastructure (such as schooling, healthcare provision, parks, etc). Many Spelthorne residents are feeling fed up with the council enabling what appears to be the naked pursuit of profit for property developers, with little or no regard for the current and future needs of local residents.

I hope you will surprise us all by taking these concerns seriously, and put forward a Local Plan that respects existing Green Belt boundaries.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Helen di Paolo (41983937)</b>
<b>Organisation:</b>

<b>Response ID: 1117171</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I strongly oppose the council's rejection of 41 sites - which include school playing fields, sports grounds, allotments, Green Belt areas and other protected urban open spaces (PUOS) - for official protection from development, This is a request for the Council to protect as Local Green Spaces all the remaining PUOS that are still in existence, including school playing fields, private sports grounds, allotments, the Staines Reservoir Aqueduct, Stanwell Quarry, Duncroft, Wraysbury Road in Staines, the Grounds of Sunbury Court and Spelthorne Grove in Ashford. This is also a request to reverse the decision not to protect the 19 Green Belt areas which were proposed by residents as Local Green spaces due to their particular importance to the community.

At a time when we are facing a global climate crisis, not to mention increasing problems with mental health and obesity, it is essential to protect the few green spaces we have left in Spelthorne. It is widely proven that access to green space improves quality of life for people on many levels. Equally importantly, green spaces act as carbon sinks, mitigate flooding, provide a habitat for wildlife, and help reduce temperatures during heat waves. There is already a dire shortage of green space in Spelthorne. There are numerous new housing developments which have been built without any consideration being given to the supporting infrastructure (such as schooling, healthcare provision, parks, etc). Many Spelthorne residents are feeling fed up with the council enabling what appears to be the naked pursuit of profit for property developers, with little or no regard for the current and future needs of local residents.

I hope you will surprise us all by taking these concerns seriously, and put forward a Local Plan that respects existing Green Belt boundaries.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Jon di Paolo (42011169)</b>
<b>Organisation:</b>

<b>Response ID: 1117520</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I am writing as a resident of Ashford to express my opposition to the council's rejection of 41 'green' sites for official protection from development in its 'Local Green Space Review of submitted spaces' of January this year. Ashford and the surrounding area are already blighted by over-development, and the network of major roads extending around Heathrow. This has been compounded in recent years with the construction of blocks of new flats on what used to be common green space off the High Street. The abject lack of provision of concomitant new facilities such as schools and medical surgeries, or thought to consequent congestion on already busy roads gives the impression that they are being built solely to make a quick profit for the developers (and their associates) with complete disregard for the needs of the people moving in to them, much less the wider community. The sites you are refusing to protect include school playing fields, private sports grounds and allotments, all of which help contribute to mental and physical wellbeing at a time when poor air quality, mental illness and obesity are known to be causing widespread health problems, further burdening an already overstretched NHS.

That is beside the basis they provide for biodiversity (or what is left of it) and flood alleviation (likely to become more of a problem in the years to come). There are plenty of eyesore buildings that could make way for yet more flats if the desire to cash in on inflated property prices must continue to override all other considerations, not least the car park on the high street. I ask you to protect as designated Local Green Spaces all the remaining protected urban open spaces (PUOS) that are still in existence and have not as yet been built on (nor are currently being built on) including school playing fields, private sports grounds, allotments, the Staines Reservoir Aqueduct, Stanwell Quarry, Duncroft, Wraysbury Road in Staines, the Grounds of Sunbury Court and Spelthorne Grove in Ashford. I also ask you to protect the 19 Green Belt areas and other rejected sites that were proposed by residents as Local Green spaces due to their particular importance to the local community.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Katerina D’Imperio (41993537)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117272</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Ashford Common / Chessholme Road I write this email to kindly ask that we keep our road as a local green space and avoid any future plans of development on the green. The green is what brings our community together and makes a safe environment for the children on our road and also the dog lovers. As someone who has recently moved into the road, I see the amount of happy children playing on the green and I absolutely love it! It creates a super happy environment. The green also adds a real beauty to the road and was a big selling factor to many of my neighbours and I when moving into the road.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent:</b> Mr Alan Doyle (19813793)
<b>Organisation:</b> Keep Kempton Green

<b>Response ID:</b> 1117489
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
2. At page 19 (ST2: Planning for the Borough) the Pre-Submission Spelthorne Local Plan 2022 states, at 1): “The housing requirement for Spelthorne is 618 dwellings per annum over the plan period (2022 – 2037), a total of 9,270. During the plan period, provision has been made for at least 9,270 new homes.” Similarly, at page 61 (H1: Homes for All) the Pre-Submission Spelthorne Local Plan 2022 states, at 1): “The Council will make provision for at least an additional 618 homes per annum in Spelthorne Borough over the plan period.” (Our emphasis in both cases.) The housing requirement of 618 dwellings per annum is calculated using the Standard Method for assessing housing need, 2021. As stated in the Foreword to the Draft Local Plan, that Standard Method uses household growth projections almost a decade old. If subsequent projections were used,

the 618 figure would be reduced to 347 per annum – 44 per cent lower. The Standard Method therefore hugely overstates the housing need in Spelthorne.

The words “at least” should be removed in both instances, and replaced with the words “a maximum of”.

Please see attached five page document for in-depth response.

**Question 6:** You can upload any modifications below.

Doyle, Alan[3869] - rep form\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618865/PDF/-/Doyle%5F%20Alan%5F3869%5F%20%2D%20rep%20form%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Keep Kempton Green (KKG) was formed in 2013 – under a different Chief Executive, local political system, and several Council Leaders ago – to fight plans by The Jockey Club to build thousands of houses on the Kempton Park Estate. (Please see [keepkemptongreen.com](http://keepkemptongreen.com) for the extensive documentary database we have built up over the years.) That campaign, led by Keep Kempton Green, has been successful so far.

Nevertheless, we would like to see this campaign through its latest stage – the new Spelthorne Local Plan - and request that we be allowed to present our case at the Examination in Public when it is held.

<b>Respondent: Mr Alan Doyle (19813793)</b>
<b>Organisation: Keep Kempton Green</b>

<b>Response ID: 1124610</b>
<b>Policy / Evidence Base / Part of Plan: Policy PS1: Responding to the climate emergency</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
1. We fully support the proposal to retain the strongly performing Green Belt status of Kempton Park, with no part of it proposed to be released from the Green Belt, whether to meet the Borough’s housing and other development requirements either during the plan period to 2037 or the longer term. a) However, we note that the Council’s Spelthorne Green Belt Assessment Stage 2 Final Report December 2018 (“the Stage 2 Assessment”) (at Table 4.1 on page 29) materially understates the contribution to Green Belt purpose 1 having regard to the relevant criteria set out in Table 3.4 on page 22. This is in contrast to the Green Belt Assessment (Stage 1) Report: Methodology and Assessment February 2017 which concluded a not materially different assessment area performed strongly against this purpose. (See Table 5.1 on page 57.) The Stage 1 assessment is clearly correct having regard to the criteria. Notwithstanding this apparent error, the Stage 2 Assessment concluded that Kempton Park performed strongly overall in terms of Green Belt

purposes (Table 4.5) and the Council has rightly not taken it forward as development option either as a strategic allocation or, lesser scale development of any smaller area.

The error in the GBA Stage 2 final Report in Table 4.1 page 29 should be corrected.

b) KKG also notes that the SLAA 2021 incorrectly attributes (at page 20, sites SE1/015 and SE1/015a) an overall moderate performance of Kempton Park to Green Belt purposes. In the GBA Stage 1 and the summary of GBA Stage 2 (and also the Discounted Alternative Site Allocations – Officer Site Assessments document), both the larger parcel (SE1/015) and the smaller parcels (SE1/015a) were assessed as strongly performing (at pages 344 and 358 respectively).

Please see attached document for full response including table(s).

**Question 6:** You can upload any modifications below.

Doyle, Alan[3869] - rep form\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618866/PDF/-/Doyle%5F%20Alan%5F3869%5F%20%2D%20rep%20form%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Keep Kempton Green (KKG) was formed in 2013 – under a different Chief Executive, local political system, and several Council Leaders ago – to fight plans by The Jockey Club to build thousands of houses on the Kempton Park Estate. (Please see [keepkemptongreen.com](http://keepkemptongreen.com) for the extensive documentary database we have built up over the years.) That campaign, led by Keep Kempton Green, has been successful so far.

Nevertheless, we would like to see this campaign through its latest stage – the new Spelthorne

Local Plan - and



<b>Respondent: Mr Alan Doyle (19813793)</b>	
<b>Organisation:</b> Keep Kempton Green	
<b>Response ID:</b> 1124641	
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>Keep Kempton Green (KKG) was formed in 2013 - under a different Chief Executive, local political system, and several Council Leaders ago -to fight plans by The Jockey Club to build thousands of houses on the Kempton Park Estate. (Please see keepkemptongreen.com for the extensive documentary database we have built up over the years.) That campaign, led by Keep Kempton Green, has been successful so far. Nevertheless, we would like to see this campaign through its latest stage - the new Spelthorne Local Plan - and request that we be allowed to present our case at the Examination in Public when it is held.</p> <p>1. We fully support the proposal to retain the strongly performing Green Belt status of Kempton Park, with no part of it proposed to be released from the Green Belt, whether to meet the Borough's housing and other development requirements either during the plan period to 2037 or the longer term.</p>	

a) However, we note that the Council's Spelthorne Green Belt Assessment Stage 2 Final Report December 2018 ("the Stage 2 Assessment") (at Table 4.1 on page 29) materially understates the contribution to Green Belt purpose L having regard to the relevant criteria set out in Table 3.4 on page 22. This is in contrast to the Green Belt Assessment (Stage 1). Report: Methodology and Assessment February 2017 which concluded a not materially different assessment area performed strongly against this purpose. (See Table 5.1 on page 57.) The Stage 1 assessment is clearly correct having regard to the criteria, Notwithstanding this apparent error, the Stage 2 Assessment concluded that Kempton Park performed strongly overall in terms of Green Belt purposes (Table 4.5) and the Council has rightly not taken it forward as development option either as a strategic allocation or, lesser scale development of any smaller area.

The error in the GBA Stage 2 final Report in Table 4.1 page 29 should be corrected.

b) KKG also notes that the SLAA 2021 incorrectly attributes (at page 20, sites SE1/015 and SE1/015a) an overall moderate performance of Kempton Park to Green Belt purposes. In the GBA Stage 1 and the summary of GBA Stage 2 (and also the Discounted Alternative Site Allocations - Officer Site Assessments document), both the larger parcel (SE1/015) and the smaller parcels (SE1/015a) were assessed as strongly performing (at pages 344 and 358 respectively).

The errors at page 20 in the SLAA are inconsistent with the evidence base and should be corrected.

2. At page 19 (ST2: Planning for the Borough) the Pre-Submission Spelthorne Local Plan 2022 states, at 1):

'The housing requirement for Spelthorne is 618 dwellings per annum over the plan period (2022 - 2037), a total of 9,270, During the plan period, provision has been made for at least 9,270 new homes.'

Similarly, at page 61 (H1: Homes for All) the Pre-Submission Spelthorne Local Plan 2022 states, at 1):

"The Council will make provision for at least an additional 618 homes per annum in Spelthorne Borough over the plan period."

(Our emphasis in both cases.)

The housing requirement of 618 dwellings per annum is calculated using the Standard Method for assessing housing need, 2021, As stated in the Foreword to the Draft Local Plan, that Standard Method uses household growth projections almost a decade old. If subsequent projections were used, the 618 figure would be reduced to 347 per annum - 44 per cent lower. The Standard Method therefore hugely overstates the housing need in Spelthorne.

The words 'at least' should be removed in both instances, and replaced with the words "a maximum of".

3. The document Discounted Alternative Site Allocations - Officer Site Assessments (at pages 338 to 353 and at pages 354 to 364) discusses the two submissions under the Call for Sites by The Jockey Club: firstly, the wider area comprising the bulk of the Kempton Park estate (SE1/015) and secondly, the two areas on the western edge of the estate (SE1/015a)

We fully support the Council's assessment that neither SE1/015 nor SE1/015a is suitable for development.

However, we would make the following additional points:

a) The discussion of site SE1/01.5 (the larger area) contains numerous references to the approximately 2500 homes being the proposed size of the development. In fact, The Jockey Club, and The Jockey Club's preferred developer Redrow, are on public record as assessing the capacity of the site as 3000 homes. The likely negative impact of an even larger -by 20% - proposed development than the 2500 dwellings mentioned in the Discounted Sites assessment would therefore be substantially greater than assessed.

In the light of this, we view the submission by the Jockey Club in the second Call for Sites for the inclusion of the smaller parcels of land set out as SE1/015a (for the building of 500 dwellings) as a 'Schwarzenegger' strategy ("We'll be back"). If such a development were granted, it is likely that it would shortly lead to a second application to build on the rest of the estate, with the precedent of building on Kempton Park Green Belt having been established.

Thus, the application for building on the two parcels of land in SE1/015 cannot be viewed outside the context of the application to build on the whole estate in SE1/015.

This possibly greater proposed development size should be reflected throughout the text, and the positive scores reduced accordingly where appropriate.

b) Discounted Alternative Site Allocations - Officer Site Assessments, in 2, on page 339, there is the following under To facilitate the improved health and well being of the whole population and reduce inequalities.

:

"Given the large scale of development, new health care, education, community, and open spaces facilities will be provided to meet the needs of the growing population, Increase in pressure on access to existing facilities as a result of new development at the site will need to be mitigated."

These issues are also mentioned in passing in the assessment of SE1/015a at 2d on page 360.

The narrower issue of educational facilities is again referred to in stage 2d - sustainable location on page 347.

KKG notes that Lower Sunbury has felt the burden of substantial cumulative development over the past decade or so, none of which has been mitigated by the provision of extra healthcare, educational or other infrastructural facilities, with the result that, for example, the Sunbury Health Centre is one of the most over-subscribed health centres in England; one particularly large development resulted in the loss of a very large public open space in the centre of the village; and there has been growing pressure on school places in Sunbury. There is, in our opinion, no reason to believe that this would change with the development that The Jockey Club is proposing, which would be hugely larger than the totality of all developments in Sunbury over the past 15 years;

Our experience is that infrastructure does not follow development. This should be specifically recognised, and the positive score for section 2. of the Sustainability Appraisal on page 339 should therefore be changed to a negative score.

c) Further, in Discounted Alternative Site Allocations - Officer Site Assessments, in 1.. on page 338, there is very positive {++} assessment of the Objective: To provide sufficient high quality housing to enable people to live in a home suitable to their needs and which they can afford.

This very positive assessment in 1. fails to take any account whatsoever of the concern that concentrating an extremely large number of new homes in one relatively small area of the Borough means that the negative spill-over effects on existing communities and infrastructure in terms of traffic, medical, educational and open spaces (which cannot be adequately mitigated, if at all) would be also be concentrated in one relatively small area of the Borough. It is therefore actually an overall negative to have so many potential homes concentrated in one area. The ++ score for 1. on pages 338 and 339 should be replaced with a negative assessment.

This issue of concentrating negative effects in one area is partially addressed in Stage 2a - Contribution to the delivery of the strategy on page 345 of Discounted Alternative Site Allocations - Officer Site Assessments. But only partially, and far too much credence is given to “several highways mitigation measures identified by the site-promoter”. The score of 2 in this section should be reduced.

d) Also in Discounted Alternative Site Allocations - Officer Site Assessments, in 2. on page 339, there is the following:

“Development of the (Kempton Park) site would have several positive impacts on health and well-being, namely through the proposed new country park which will open up privately owned, currently inaccessible land to the public for recreation use.”

This issue is also mentioned subsequently, (at page 346 : “...Although (Kempton Park is) not readily accessible physically to the residents of the surrounding urban area, ...” and at page 347 : “ ...,it (Kempton Park) is not open to the public and previous’ permissible paths’ have ceased use....” (our emphases)

We would note that there is nothing to stop the landowner “opening up” this land right now for public recreational use. It does not need the building of a very substantial housing development (which would, in fact, almost wholly remove the open area) to do so, with public access to a very much smaller area being held out as a carrot,

In fact, there was an agreement in the past between the landowner and the Council for public access to the eastern part of the estate to be allowed, but the landowner has instead, over the years, progressively prohibited public access to the eastern part of the estate, to the point where the only place the public can now use is a very small and very high-fenced dog-walking area on the southern perimeter. The use of the words “...’permissible paths’ have ceased use” infers that it is the public that have stopped using them. This is not the case. The public have been prevented from using them.

This issue of the prevention of public access should be reflected in the text, and serve to reduce the score for section 2. of the Sustainability Appraisal on page 339 to a negative. This issue of public access is mentioned in passing in the assessment of site SE1/015a, at 2c on page 260. Our points above regarding public access apply. (see attached document for table).

**Question 6:** You can upload any modifications below.

Doyle, Alan[3869] - rep form\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618867/PDF/-/Doyle%5F%20Alan%5F3869%5F%20%2D%20rep%20form%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

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Nevertheless, we would like to see this campaign through its latest stage - the new Spelthorne Local Plan - and request that we be allowed to present our case at the Examination in Public when it is held.

<b>Respondent: Mr Alan Doyle (41229857)</b>
<b>Organisation:</b>

<b>Response ID: 1110636</b>
<b>Policy / Evidence Base / Part of Plan: Policy SP4: Green Belt</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No Response
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Alan Doyle (19813793)</b>
<b>Organisation: Keep Kempton Green</b>

<b>Response ID: 1117490</b>
<b>Policy / Evidence Base / Part of Plan: Policy H1: Homes for All</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Similarly, at page 61 (H1: Homes for All) the Pre-Submission Spelthorne Local Plan 2022 states, at 1): “The Council will make provision for at least an additional 618 homes per annum in Spelthorne Borough over the plan period.” (Our emphasis in both cases.) The housing requirement of 618 dwellings per annum is calculated using the Standard Method for assessing housing need, 2021. As stated in the Foreword to the Draft Local Plan, that Standard Method uses household growth projections almost a decade old. If subsequent projections were used, the 618 figure would be reduced to 347 per annum – 44 per cent lower. The Standard Method therefore hugely overstates the housing need in Spelthorne. The words “at least” should be removed in both instances, and replaced with the words “a maximum of”.



Please see attached in-depth response document.

**Question 6:** You can upload any modifications below.

Doyle, Alan[3869] - rep form\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618863/PDF/-/Doyle%5F%20Alan%5F3869%5F%20%2D%20rep%20form%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Keep Kempton Green (KKG) was formed in 2013 – under a different Chief Executive, local political system, and several Council Leaders ago – to fight plans by The Jockey Club to build thousands of houses on the Kempton Park Estate. (Please see keepkemptongreen.com for the extensive documentary database we have built up over the years.) That campaign, led by Keep Kempton Green, has been successful so far.

Nevertheless, we would like to see this campaign through its latest stage – the new Spelthorne Local Plan - and request that we be allowed to present our case at the Examination in Public when it is held.

<b>Respondent: Mr Colin Duguid (42023009)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117783</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
I would like to support the protecting of local Green Space, in particular Ashford Common, Elgin Avenue. I use this land for recreation and walking of pets daily and for the local children to play safely in front of our houses. This area of land has also been used to facilitate street parties on a regular basis where residents can gather and socialise and bring the community together. It is vital that green belt spaces are protected and respected. Thanks for protecting our green space for future generations - save our green belt in Spelthorne.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr John Dunne (34309665)</b>
<b>Organisation:</b>

<b>Response ID: 1112362</b>
<b>Policy / Evidence Base / Part of Plan: Policy SP1: Staines-upon-Thames</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Please find attached a copy of my Report. Remember to take into consideration when I wrote the report the British Gas site on the London Road and the Telephone exchange sites were still vacant to my knowledge at the time. There are alternatives but as far as I am aware these sites have also been earmarked for redevelopment. In my personal opinion and I would like to make it known that before any site in the borough is sold of to developers. A thorough investigation should take part into the developers and their practices and their investors so that the council does not allow Russian investors to own or have any investment in UK properties. There should be a current investigations into any developments due to start construction to make sure that any companies that want to run construction projects in Spelthorne are free from and Russian influence. All Planning permission should be revoked until all Investigations are complete. That includes the Telephone Exchange site.

Most of the information into company's can be found on the internet. I am sure Company's House would be interested in investigating many of them. I would like this put on record if possible and brought up at a council meeting. We need to save our Town the best way we can. And Stop being Bullied by developers and the Government. Give them and inch and the community is gone.

**Question 6:** You can upload any modifications below.

Personal Report on Staines Redevelopment.doc

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/565549/WIZ/-/Personal%20Report%20on%20Staines%20Redevelopment%2Edoc>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr John Dunne (34309665)</b>	
Organisation:	
<b>Response ID: 1112360</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ID2: Sustainable Transport for New Developments	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
TRANSPORT LINKS. A small around the town bus service using electric , should connect the railway station with the Two Rivers, Elmsleigh, Thorpe Park, Sainsbury's, Heathrow Terminals and down to Staines Town Football Club and Knowle Green Leisure facilities. As mentioned these buses would be powered by Electric or Hydrogen Fuel cell technology. The Hub for these buses could be situated at the old London Rd British Gas site. (No Longer possible due to, you guessed it more Tower blocks.)	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Sarah Dunningham (42025441)</b>
<b>Organisation:</b>

<b>Response ID: 1117833</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
LGS Ashford Common Tudor Road I am writing re the proposal as re defining Tudor road grass area as local green space. This area is used by the whole of Tudor road for street parties and social events , children play on it and ride their bikes around the green space and also the people who own dogs use this area. In the summer the residents will sit out on the grass and it's a time we chat to each other. There is a good community spirit in Tudor road and without this space I believe it will be affected .
<b>Question 6:</b> You can upload any modifications below.
No Response



**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Darsha Dvorackova (42079457)</b>
<b>Organisation:</b>

<b>Response ID: 1119009</b>
<b>Policy / Evidence Base / Part of Plan: Policy SP4: Green Belt</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
I have now receive a letter about proposal, that some new development should be plan at current green part of new Brooklands site. I'm extremely concern, this is will over take only green place in Ashford, partly as kids playground. This is only place to take kids close to library , as other parks are not ideally walking distance and are far away. I live in Pike Crescent, I use park daily, and same as other neighbours. There are still 2 building in progress of finishing, giving enough new flats to grown population, not even mentioned old Ashford car park is shut and will be many more flats build. Can I also say, many flat are still available and are ready to be bought, seems like not so much interest. And, shall I even mention how bad maintenance is in while Brooklands development, with pest control, lift broken weekly, parking issues, stealing parcels, youngster climbing wall and roof of library via development of Filby House.

Brooklands has over 220 new flats. We are talking almost 800 new residents, who has no where to go.  
The green is use for dog walkers a lots, which many of us has a pets. Again, there is nowhere to go.  
I have seen some plans in past this green should have had wood claiming frames for kids and do beter use, but this never happened.  
With other new development over Ashford car park, more residents will need to go somewhere. I really can't see an other building happening.  
We do need to keep the green, as I see kids running there, play in park, mother's able to socialise, more kids go visit local library and sto here after.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Darsha Dvorackova (42079457)</b>
<b>Organisation:</b>

<b>Response ID: 1125965</b>
<b>Policy / Evidence Base / Part of Plan: Policy E5: Open Space and Recreation</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
I have now receive a letter about proposal, that some new development should be plan at current green part of new Brooklands site. I'm extremely concern, this is will over take only green place in Ashford, partly as kids playground. This is only place to take kids close to library , as other parks are not ideally walking distance and are far away. I live in Pike Crescent, I use park daily, and same as other neighbours. I have seen some plans in past this green should have had wood claiming frames for kids and do beter use, but this never happened. We do need to keep the green, as I see kids running there, play in park, mother's able to socialise, more kids go visit local library and sto here after.
<b>Question 6: You can upload any modifications below.</b>
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: MR LUKE E PERRY (33769281)</b>
<b>Organisation:</b>

<b>Response ID: 1112356</b>
<b>Policy / Evidence Base / Part of Plan: Policy SP1: Staines-upon-Thames</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
<p>Thank you for making the architects suggestions accessible.</p> <p>They have clearly listened to a lot of the concerns and objections along this process of consultation.</p> <p>I would support this plan.</p> <p>There are only 1 or 2 issues I can see.</p> <p>It looks much better than Staines-upon-Thames as it currently is.</p> <p>From what I can see it looks like it would make Staines-upon-Thames a much more friendly environment - greenery and added access for cyclists and pedestrians.</p> <p>As well as better access to existing - but cut off -natural areas like the River Thames and Staines Moor.</p>

It's good to see the new residential and commercial spaces will be sympathetic and not overbearing on the surrounding architecture.  
I think there will always be problems with through-traffic and it's hard to change this.  
Likewise it's a dense area already but there is at least some consideration to making the best of green space already present.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Jonathan Edgar (41969921)</b>
<b>Organisation:</b>

<b>Response ID: 1117063</b>	
<b>Policy / Evidence Base / Part of Plan: AT1/002 (Land East of Ashford Sports Club, Woodthorpe Road)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: You are building more houses with no plan on increasing services such as doctors, dentist and school places.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No Response	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No Response



If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: June Edwards (41825313)</b>
<b>Organisation:</b>

<b>Response ID: 1114466</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy SP4: Green Belt
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I write with reference to the green at Catherine Drive in Sunbury. I've been a resident of Catherine Drive for over 30 years and was dismayed to hear that it had been sold at auction to a private developer in May this year. The residents had launched a bid to buy the green in order to preserve it as an amenity space for future generations, but our highest bid was no match against the developer. It is so sad that we may lose this space to development. As a cul de sac this would be particularly awful as parking is limited and there is no through access for additional vehicles to adjacent roads.

Whilst we don't have rare plants or wildlife there are a number of trees on the green which support a variety of wildlife which residents then attract into their gardens - many types of birds, squirrels etc. I believe there is an ongoing application for preservation orders on all of the trees. As the whole road is built on landfill we are aware that an old lake was beneath the green and was filled with all sorts of infill which would probably not be permitted now, and that there is high risk that cutting down the trees would destabilise the soil and potentially lead to environmental issues and property subsidence for residents. Thank you for considering this request.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: June Edwards (41825313)</b>
<b>Organisation:</b>

<b>Response ID: 1125957</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
<p>I write with reference to the green at Catherine Drive in Sunbury.</p> <p>I've been a resident of Catherine Drive for over 30 years and was dismayed to hear that it had been sold at auction to a private developer in May this year.</p> <p>The green has been part of life here since the day I moved in and was the reason I purchased my house in the first place, as was the case with nearly all the other residents also. We mistakenly believed it was owned by Spelthorne Council who have carried out maintenance on it for the whole 30 years I have been here. I open my front door almost directly onto the green and it is the only green space I see in my day.</p> <p>I have walked across the green for the whole 30 years, visiting neighbours who live opposite and it is a place where people congregate and socialise. I have seen three generations of children use it daily as a safe play area and many dog walkers stop to chat there. In addition I recall Jubilee parties for the</p>

Silver, Gold and Platinum jubilees and many many times during the Covid pandemic when residents took their permitted short exercise walks on and around it (separately not together). It has always been a place for residents to share and socialise and I believe it is good for the mental health of both our housebound and all other residents.  
I would urge the Council to strongly consider applying LGS status to this green and to bar applications to develop the site and this lose one of the remaining green spaces in the area which is already densely populated and heavily developed.  
Thank you for considering this request.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Carol Elkins (41983393)</b>
<b>Organisation:</b>

<b>Response ID: 1124257</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
I am saddened and disappointed that you are proposing to release substantial areas of Green Belt for development, and I urge you to reconsider this proposal. In this climate emergency, it is vital that Green Belt, green spaces and ALL trees are protected and enhanced as they carry out very important roles as habitat for wildlife, carbon sinks, flood mitigation, temperature reduction during heatwaves and have a considerable benefit for physical and mental health. Any Green Belt release will weaken the integrity of the existing green belt and in my opinion lead to more Green Belt release in the future. I ask you: to respect existing green belt boundaries and not to amend them not to make a pro-active case for Green Belt release in your draft local plan

not to declare that there are “exceptional circumstances” to justify Green Belt release, All Green Belt is important and valued by residents and I reject the Councils classification of certain Green Belt areas as “weakly performing” as well as the criteria invented to justify such classification. By merely existing, All Green Belt sites perform one or more important function including ‘green islands’ for wildlife, checking the unrestricted sprawl of large built up areas, preventing neighbouring towns from merging into one another, assisting in safeguarding the countryside from encroachment, preserving the setting and special character of historic towns; and – extremely importantly - assisting in urban regeneration, by encouraging the recycling of derelict and other urban land (para.138 of the National Planning Policy Framework). I am also disappointed that the Council has refused to designate nineteen Green Belt areas (proposed by residents) as Local Green spaces and ask the Council to reverse this refusal as all green space must be protected.

**Question 6:** You can upload any modifications below.  
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?  
Yes/No/Not answered: No Response  
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Carol Elkins (41983393)</b>
<b>Organisation:</b>

<b>Response ID: 1117350</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I would like the green surrounded by Courtfield Road, Landon Way and Stroud Way to be designated as Local Green Space. it is a very valuable asset to the neighbourhood, being a safe place for children to play and for dog exercise. The green and existing tree also help bring nature into the road and had a cooling effect during the recent summer heatwaves. Being able to see green space also benefits mental health.
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
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Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr and Mrs R Elsom (42025537)</b>
<b>Organisation:</b>

<b>Response ID: 1117842</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
L G S Ashford Town : Queens Walk. Strategic planning. We have lived in Sandringham Drive for 36 years . Our house backs on to Echelforde recreation ground also known for many, many years as the Fairy Field. We have during our time at this property had a family who have enjoyed many happy times playing in the field. We now walk our dog in the same field , and also play with our grandsons in the same field. This space is a natural space that isn't ruined by swings and slides etc.

To build on it would be an absolute nightmare for us all. We would be totally over looked. Also our property is adjacent to the entrance. Therefore unless this entrance was permanently closed we would suffer with noise from an influx of people.  
We would like this area protected as Local Green Space.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Shehrazade Emmambokus-Teuten (42023489)</b>
<b>Organisation:</b>

<b>Response ID: 1117790</b>
<b>Policy / Evidence Base / Part of Plan: Policy E5: Open Space and Recreation</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
I am writing to you to add the Chessholme Road Green to Spelthorne’s list of protected “Local Green Space”. Why We Moved to Chessholme Road I have lived in Chessholme Road for nearly 10 years. When my husband and I were house hunting, we both agreed that this was the street we wanted to live in. In fact, we put an offer in for #23 but when that sale fell through we waited. Then when #33 (our house) came up on the market, that same day we visited, put in the asking price offer - as we didn’t want to risk losing this property - and the rest, as they say, is history. Why were we desperate to live in Chessholme Road? Very simply: the green.

I was born in Ashford Hospital and have lived in Ashford my entire life - 41 years - and no other street in this town has anything as beautiful or unique like our green. My husband and I could have bought any 3 or 4 bed property in Ashford. And when the sale of #23 fell through, we looked at 10-15 more properties, but nowhere else felt as warm or welcoming as Chessholme Road and its green.

#### Children

We now have a six year old and he loves the green - and he's not the only child. On our street there are approximately 15 kids - all of whom play on the green. In the summer holidays it is so nice to hear kids playing outside, making friends and getting away from their TV/Computer/Tablet/Mobile screens. There are often football games being played on the green and on a weekend there are kids playing on there all day.

Additionally, as we are essentially a cul-de-sac, only residents and visitors really come down our way so us parents feel safe letting our kids play outside. Our son is only 6 so he is never unattended, but when he's older I wouldn't have a problem. I can sit in my front room or office and see him playing on the green. So he will be able to have his "freedom" - albeit from my watchful eye inside.

As a community, we're all quite close, so even if I wasn't watching my son, I know Dave and Wendy (#19) on the other side of the green, or Karen and James (#6) left of us on the green, or Colette and Oz (# 26) right of of us on the green would keep an eye out.

The green offers our children a safe space to play which - especially in this day and age - is something no parent could put a price on.

#### Community

As I have mentioned above, we have a lovely little community in Chessholme Road. During COVID, we had Thursday morning tea (socially distanced of course) gang out there and everyone was invited.

The last time it snowed, we were all on the green building snowmen and throwing snowballs at each other.

Aside from the children, we have a lot of dog owners on our street and the dog owners arrange puppy play dates on the green. I often see dogs Ralphie (#34) and Ruby (#29) out there with their owners playing fetch and running about.

As I have said, I have lived in Ashford for 41 years (Chestnut Road, Feltham Hill Road and Reedsfield Road), but in all my time I have never had this same sense of community as I have living in Chessholme Road. And I honestly believe that the green is what brings us together.

Images Why Chessholme Road Green Should Be A Protected "Local Green Space" (Please see attached document).

**Question 6:** You can upload any modifications below.

Emmambokus-Teuten, Shehrazade - Supporting images\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618989/PDF/-/Emmambokus%2DTeuten%5F%20Shehrazade%20%2D%20Supporting%20images%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Richborough Estates (42188193)</b>	
<b>Organisation:</b>	
<b>Response ID: 1127874</b>	
<b>Policy / Evidence Base / Part of Plan: Evidence Base - Green Belt Assessment</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Not justified, Not effective, Not consistent with national policy - were also selected Policy SP4 seeks to prevent inappropriate development within the Green Belt. Whilst we agree with the principle of the Policy, we certainly do not agree with the p	Additional Comments: No Not justified, Not effective, Not consistent with national policy - were also selected Policy SP4 seeks to prevent inappropriate development within the Green Belt. Whilst we agree with the principle,of the Policy, we certainly do not agree with th
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Not positively prepared Not justified, Not effective, Not consistent with national policy - were also selected Policy SP4 seeks to prevent inappropriate development within the Green Belt. Whilst we agree with the principle of the Policy, we certainl
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Not justified, Not effective, Not consistent with national policy - were also selected Policy SP4 seeks to prevent inappropriate development within the Green Belt. Whilst we agree with the principle of the Policy, we certainly do not agree with the p	Additional Comments: No Not justified, Not effective, Not consistent with national policy - were also selected Policy SP4 seeks to prevent inappropriate development within the Green Belt. Whilst we agree with the principle of the Policy, we certainly do not agree with th
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	

**Question 4:** Please give details of why you consider the Local Plan is **not legally compliant** or is **unsound** or **fails to comply with the duty to co-operate**. Please be as precise as possible.

If you wish to **support** the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:

No Response

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

The Local Plan proposes to release just 0.7 ha of Green Belt with a brownfield first strategy the focus. As evidenced elsewhere, brownfield sites often involve long lead in times owing to site-specific delivery constraints, for instance, costs associated with remediation/difficulties with design. Consequently, this can impact the viability of development affecting the delivery of affordable housing. To the contrary, the delivery of homes on Green Belt sites allows for family homes to be delivered with policy compliant levels of affordable housing – noting there is a need as confirmed in the Strategic Housing Market Assessment ('SHMA') of the Borough requiring 459 affordable homes per year<sup>1</sup>. Not only will this approach therefore meet the need of local communities, but with "a significant need for affordable housing"<sup>1</sup> in the Borough (with only 177 completed 2020-2021)<sup>1</sup>, it is clear that the only way this will be delivered is through additional Green Belt land being released and allocated for residential development.

Furthermore, and as supported by the HBF, "the issue of housing needs and affordability alone are sufficient to justify further amendments to the Green Belt boundary". In consideration that housing is a strategic policy matter and in accordance with paragraph 140 of the NPPF and strategic policies "establishing the need for any changes to Green Belt boundaries", it is evident, there are the exceptional circumstances for further release.

In summary, we contend our analysis as set out below and contained within the enclosed letter clearly demonstrates Site LS1/020 – Land north of Charlton Road (that was within sub area 25-b) does not perform the purposes for which land is included in the Green Belt and as such, should be released from the Green Belt and allocated for residential development.

The Green Belt Assessment states sub-area (25-b) is "moderately performing but less important contribution to wider strategic Green Belt. Recommended for further consideration". In the conclusions of the Green Belt Assessment – Stage 2 ('GBA2'), it states, "... its (sub area 25-b) release in isolation would not harm the performance of the wider strategic Green Belt".

We therefore want to stress our support of these findings and for clarity, we set out below our comments previously submitted (in response to GBA2) which focus on the strong and defensible boundaries that would be formed through the Queen Mary Reservoir to the west and New Road/Charlton Road to the east and south – a position that is supported by the Council in the Assessment.

(1) To check the unrestricted sprawl of large built-up areas



GBA2 scores this sub-area a 3 out of 5 in terms of its role against this purpose of the Green Belt. This is despite this sub-area not being located adjacent to one of the defined large built-up areas, but instead the village of Charlton. This is described within the adopted Core Strategy as a “separate urban area” from Staines or Ashford.

Furthermore, with reference to the base of the Queen Mary Reservoir and New Road/Charlton Road resulting in a “stronger Green Belt boundary than existing”<sup>1</sup>, it is clear its release would not lead to the unrestricted sprawl of Charlton.

The score applied to this sub-area is not considered sound and should therefore be revised to ‘0’ rather than (3+) in respect of criteria 1b.

(2) To prevent neighbouring towns merging into one another

The Site is situated between built form (Charlton Village) to the north/east and the Queen Mary Reservoir to the west.

Furthermore, in GBA2, it states that “the presence of significant buffer features to the south and north-west, the sub-area makes little contribution to the physical separation between the settlements”<sup>1</sup>. It is therefore clear its release would not result in merging with neighbouring towns. In accordance with (Table 3.6 of GBA2), as the Site “does not provide a gap between any settlements and makes no discernible contribution to separation”, it should score ‘0’ rather than 1.

(3) To assist in safeguarding the countryside from encroachment

Whilst the features as referred to above provide a “strong connection to the adjacent settlement edge”, we consider the sub-area displays the characteristics of a semi-urban location and in accordance with the Table 3.7 of GBA2, suggest the score should be ‘2’ rather than ‘3’.

(4) To preserve the setting and special character of historic towns. The Site does not abut an identified historic settlement. We therefore agree with the Score of ‘0’.

(4b and 4c) Assessment of Impacts on the Wider Green Belt / Consideration of Boundaries

It is clear and demonstrated that the Site’s release from the Green Belt would not lead to the unrestricted sprawl of Charlton or the merging with neighbouring towns. Further, given the established and defensible boundaries formed by the Queen Mary Reservoir (to the west), Charlton Village to the north and east alongside New Road/Charlton Road, as concluded in GBA2, we wholly agree that “the sub-area does not play a fundamental role with respect to the wider Green Belt, and its release in isolation would not harm the performance of the wider strategic Green Belt”<sup>1</sup>.

For clarity and to highlight how the sub-area should be scored is set out below: (see page 13 of attached document)

(5) Categorisation

For the reasons set out above, we consider the Site should be recognised as performing weakly in Green Belt terms and subsequently, does not make an important contribution to the wider strategic Green Belt. We therefore requested the Site be released from the Green Belt and these conclusions have not changed.

**Question 6:** You can upload any modifications below.

Richborough Estates - Pre-Submission Local Plan\_Redacted.pdf  
<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618779/PDF/-/Richborough%20Estates%20%2D%20Pre%2DSubmission%20Local%20Plan%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Yes, I wish to participate in hearing session(s) To confirm that Exceptional Circumstances exist to justify the release of additional Green Belt land for residential development. Further, to continue to highlight that the Council's Assessment of the Site (LS1/020 – Land north of Charlton Road) is incorrect and the site should be released from the Green Belt and allocated for residential development.  
Please see enclosed letter that provides the composite response.

<b>Respondent: Mr Roger Fenwick (41000257)</b>	
Organisation:	
<b>Response ID: 1124244</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Please find my objections to the development of the retirement village.	
1. Object to the loss of open space.	
2. Concerned about the close proximity of the access road to the retirement village to the junction with Groveley Road, this is already a hazardous junction for both cars and pedestrians.	
3. Yet another road coming on to Vicarage Road which is currently busy, often with speeding vehicles.	
4. Why do they think the people of Sunbury will sell their homes to live there?	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: David &amp; Karen Field (42025729)</b>
<b>Organisation:</b>

<b>Response ID: 1117845</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Sanford common Stroud way, Courtfield Road. Thirty eight years ago we bought our house in Courtfield Road one of the defining factors in the purchasing of this property was the fact that the house overlooked a little green this green has proved to be the social hub of our estate. We have had Jubilee parties children's parties bonfire night and New Year's Eve get togethers we have had many events throughout the years with all neighbours getting together and supporting each other parents don't worry about letting their children play on the green because they know that they are safe. At night we have foxes that also play on the green we have a vixen who often brings her Cubs to play we have seen hedgehogs and other varieties of wildlife my husband would like to put a bat box in the tree as we have seen the odd bat flying around ( how does he get permission to do this). We would like too see our grand children playing on the green like our children used too. Too lose the green would be demoralising and depressing. The green defines our happy neighbourly cul de sac.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Dermot Fisher (41671681)</b>
<b>Organisation:</b>

<b>Response ID: 1124237</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Kempton green needs to be kept, there is not enough infrastructure to support any more housing.
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No Response
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response





<b>Respondent:</b> Nigel Fisher (19542177)
<b>Organisation:</b> Brett A2Dominion Group

<b>Response ID:</b> 1122483	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: In summary we say that the plan is not sound because: <ul style="list-style-type: none"> <li>• it has not been positively prepared – the strategy will not meet the area’s objectively-assessed housing needs whether in terms of absolute numbers or the types of dwellings that local people need;</li> <li>•</li> </ul>
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
In summary we say that the plan is not sound because: <ul style="list-style-type: none"> <li>• it has not been positively prepared – the strategy will not meet the area’s objectively-assessed housing needs whether in terms of absolute numbers or the types of dwellings that local people need;</li> <li>• it is not justified – it has unjustifiably rejected alternative approaches which could yield significant benefits;</li> <li>• it is not effective – the strategy is not deliverable; and</li> </ul>	

- it is not consistent with national policy – it will not deliver the size, type and tenure of housing needed for different groups in the community; will not facilitate larger-scale development to boost the supply of homes (for example by way of significant extensions to existing towns); and will not necessarily deliver good design (given the apparent conflicts with the Staines Development Framework).

#### Discussion Relating to ‘Soundness’

The Council agrees that since the introduction of the OAN calculated through the SHMA in 2015, Spelthorne has struggled to deliver enough homes to meet its needs.

Eight out of 10 sites that were allocated in 2009 – most of which are brownfield sites – have not come forward, including two sites which are owned by the Council.

The Council also states that in the absence of an up-to-date Local Plan, coupled with a lack of five-year housing land supply, there remains significant pressure on existing Green Belt sites across the Borough. An appeal was allowed in July 2021 at Bugle Nurseries in Upper Halliford for 31 dwellings within strongly performing Green Belt.

Whether the lack of development is a consequence of the failure to maintain an up-to-date development plan is an interesting point. Since the NPPF was published in 2012 there has been a presumption in favour of sustainable development, including in relation to the redevelopment of previously-developed land, along with a strong desire to boost the delivery of housing – so the majority of the of the Council’s proposed allocations do not need to be allocated in a development plan document to enable development to proceed. Despite this, development has not kept pace with need, and even where ‘rolled-over’ sites have previously been allocated they have not been brought forward.

There will no doubt be a complex range of factors to explain why sites have not been brought forward including the lack of available and affordable land / premises for existing non-residential occupiers to move to to facilitate development. Viability will also be a key consideration, not least when the value of the asset and the cost of demolition / redevelopment are taken into account. The cost of preparing a planning application and the perceived difficulties of navigating the planning system can be additional barriers – and given the reactions to a number of applications mentioned in this Statement, this factor is no doubt a significant issue for property owners contemplating development in Spelthorne.

In that context we strongly support the Council’s determination to meet housing need and to provide more family homes with gardens. Whilst not in its overarching strategy we note the Council’s recognition that the acute housing affordability issues in Spelthorne should be addressed and suggest that it be given much greater weight in the submitted local plan so as to enable all members of the community to enjoy living and working in the Borough. However, we consider that there are some serious flaws in the Pre-submission Local Plan’s strategy which ought to be addressed before the plan is submitted, lest it be found unsound.

#### 1. Balance between Brownfield and Greenfield development

The Council recognises that family housing would not be feasible on previously-developed urban sites. The draft local plan notes a need for 50-55% three bedroom and 20-25% four bedroom in the market housing tenure. For affordable rented and affordable home ownership, 30-45% of housing should be family housing.

However, of the 8,646 dwellings that are not under construction, just 829 (9.6%) would be in the Green Belt which the Council identifies as suitable for family housing with gardens. The remainder would be on brownfield land which the Council says “are largely expected to prioritise the delivery of housing through flatted development schemes in order to maximise the efficient use of land and boost densities”.

Therefore there is a clear and significant mismatch between the types of housing that are need and the types that could be delivered based on the spatial strategy.

## 2. Affordable Housing

Similarly, there is a significant mismatch between the need for and opportunities for affordable housing, particularly in terms of larger-sized dwellings; the proposed spatial distribution will not enable the need to be satisfied.

Furthermore, the spatial strategy will not maximise the delivery of affordable housing. The Council’s viability testing suggests that 50% affordable housing would be viable on Green Belt sites and that 30% would be viable on brownfield sites. Even if the maximum could be achieved (i.e. assuming that viability testing does not reduce the percentage provided on individual developments), total delivery would be

Green Belt affordable units 50% of 829 = 415 units

Brownfield affordable units 30% of 7,817 = 2,345 units

Total = 2,760 units

If an alternative dwelling mix was proposed, the delivery of affordable housing could be materially greater, for example:

Green Belt affordable units 50% of 2,829 = 1,415 units

Brownfield affordable units 30% of 5,817 = 1,745 units

Total = 3,160 units

Using this example of shifting 2,000 units from brownfield to Green Belt sites, one can see that an additional 400 affordable housing units could be achieved – housing for which there is an acute need in the Borough.

This consideration is particularly relevant given that brownfield sites are much more likely to have additional costs than Green Belt sites (and therefore less likely to achieve the target percentage. Furthermore, the Council’s current strategy of delivering affordable housing on brownfield sites is heavily dependent on the deliverability of those sites, a matter that we will now discuss (in essence if the suggested site capacities cannot be achieved then there will be a commensurate reduction in affordable housing delivery).

## 3. Physical Capacity

Our analysis in this Statement demonstrates a significant mismatch between the predicted yield of various major sites and the proposed policies that will control the amount of development. It also highlights the significant opposition to large developments in Staines town centre.

For example, in 2019 the Debenhams site was identified in the emerging local plan as having the potential for 250 units. A scheme for 226 units was refused in 2022 and the 2022 draft local plan reduced the allocation to 150 units. However, following the criteria in the SDF this site would only have capacity for 48 dwellings.

Similarly the Bridge Street Car Park allocation identifies capacity for 158 dwellings. However, and using the SDF criteria, the whole site (excluding a hotel) would have a capacity of 158 dwellings. The Council says that a hotel would occupy half to two-thirds of the site which means that the number of dwellings would have to decrease by at least half to achieve what the SDF considers to be an appropriate density.

Using those two examples alone, the brownfield capacity has been overestimated by 179 dwellings which means that the plan does not meet the overall need of 618 dwellings per annum.

These are not the only examples. Another curious situation is the significant increase in the capacity of the Elmsleigh Centre allocation from 650 dwellings to 850 dwellings despite a decrease in the site area.

Whilst the draft local plan suggests that development would be above the shopping centre it does not explain how much of the shopping centre can be built above. Such development would have to take account of the roof-top service roads and plant and would have to be possible in structural terms. Provision would need to be made for independent residential access points and for the residential units to be serviced by refuse collectors and so on. Integrating residential use with a building such as the Elmsleigh Centre would be no easy feat and we think it highly unlikely that a significant amount of development could be developed above the Centre. Rather, it would likely require changes to the footprint of the centre so that residential use could be delivered from the ground up, and it may involve development of existing surface parking.

Whilst it is unclear whether there is sufficient highway capacity to deliver 850 homes in addition to the 343 on the Gresham Road builders' merchant's site which is opposite the Elmsleigh Centre, it is perhaps worth noting that the controversial Staines Telephone Exchange development will deliver 206 dwellings in two towers. So together, the Elmsleigh Centre and Gresham Road developments would represent the equivalent of about twelve additional towers in a relatively small part of the town centre. Given the response of the Council and local people to the Telephone Exchange development, we cannot see how this number of towers would gain support. Rather, we consider the prospective housing numbers to be unrealistic and that planning applications would be unlikely to gain sufficient support at the local level, even if a development plan allocation is in place.

As we noted earlier, the Council says that zoning proposals for Staines are only likely to be considered sound by the Inspector if the Council is meeting the housing need in full throughout the Plan period because zoning effectively limits potential housing supply by stipulating maximum heights and densities in certain more sensitive locations in the town, which could be seen as contrary to national policy on optimising development opportunities in urban and sustainable locations such as Staines.

It is the zoning proposals themselves that will prevent housing need from being satisfied if one believes that sites have the capacity to deliver the number of homes set out in the 2022 draft local plan. However we do not believe that the sites do have the capacity to accommodate the number of homes stated. The Debenhams and Elmsleigh Centre allocations are good examples to illustrate this point – whilst the Debenhams allocation has been reduced, the Elmsleigh Centre's has been significantly increased and the numbers still add up to the overall housing need across the plan period.

We also highlight the Council's expectation that Green Belt sites will come forward in the first five years of the plan, boosting housing delivery in the short term. Undoubtedly these sites will be factored in to the five-year housing land supply calculation and that the Council will argue that it has a robust five-year housing land supply. The Council will then no longer be a 'tilted balance' authority and it can resist proposals that it considers not to accord with the development plan.

The consequence of such an approach could be to undermine the Council's overall strategy to meet its full objectively-assessed need ('OAN'). This is because, whilst on paper the housing totals in the local plan would exceed the OAN, in practice many of the sites could not deliver the stated capacity, not least because of constraints imposed by the SDF. Nevertheless, the Council would still be able to argue that its plan is up-to-date (because of its 'on-paper' supply) and the delivery of Green Belt sites in the early years would help the Council to avoid failing the Housing Delivery Test and thus being subject to the 'tilted balance', at least in the short to medium term.

There are, of course, alternatives and the Brett site is just one of them. The Council has only dismissed this because it (i) is a larger site; (ii) is not brownfield land; and (iii) was the subject of objections at earlier stages in the plan process.

However, this larger site can deliver a significant number of much-needed family homes with gardens and 50% affordable housing (and it is the size of the site that makes this a viable proposition). Whilst it is not brownfield land, the Council's approach clearly demonstrates that there is not sufficient capacity to meet the Borough's needs on previously-developed sites. Finally, at least some of the Council's proposed allocations have been the subject of far greater public disquiet and objection than the Brett site, not least the Bridge Street Car Park. We therefore consider that the Council has unjustifiably dismissed realistic alternatives which would better align with its stated priorities and which would yield greater benefits.

On that basis we conclude that the Regulation 19 local plan is not sound because:

- it has not been positively prepared – the strategy will not meet the area's objectively-assessed housing needs whether in terms of absolute numbers or the types of dwellings that local people need;
- it is not justified – because it has unjustifiably rejected a realistic alternative that will yield greater benefits;
- it is not effective – because the strategy is not deliverable and it will not achieve the objectively-assessed need for new homes; and
- it is not consistent with national policy – because it will not deliver the size, type and tenure of housing needed for different groups in the community; will not facilitate larger-scale development to boost the supply of homes (for example by way of significant extensions to existing towns); and will not necessarily deliver good design (given the apparent conflicts with the Staines Development Framework).

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Nigel Fisher</b> (19542177)
<b>Organisation:</b> Brett A2Dominion Group

<b>Response ID:</b> 1122486
<b>Policy / Evidence Base / Part of Plan:</b> ST4/002 (Bridge Street Car Park, Hanover House & Sea Cadet Building, Bridge Street, Staines)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
<p>Bridge Street Car Park, Hanover House &amp; Sea Cadet Building, Bridge Street, Staines</p> <p>2019 Preferred Options – Site Allocations</p> <p>This document notes that part of the site was the subject of a recently-expired planning permission for over 200 residential units, indicating that the site is likely to be suitable for residential use. That scheme involved a 12-storey tower but developer Bellway pulled out of the development.</p> <p>The 2019 Preferred Options document noted that the size of hotel will inform the amount of residential development that could be accommodated on site. If a standard hotel is pursued, this could accommodate 150 bed spaces whilst a higher quality hotel associated with Heathrow Airport could yield 250 bed spaces. It stated that a hotel would occupy a half to two thirds of the site, leaving the remainder for residential development and that with high density development, the site may be able to accommodate 50-100 units.</p> <p>It stated that if a solely residential scheme were pursued, the site could accommodate approximately 300 units.</p> <p>In May 2020 it was reported that the Council had brought in developers Arora Group to deliver a 300-bed hotel on the site along with residential uses. A residents' briefing<sup>7</sup> in January 2021 suggested that up to 200 residential units could be delivered on the site.</p>

April 2022 Staines Development Framework

In the 2022 Staines Development Framework the site is noted as having potential for 'medium density' development with guidance of average densities up to 175dph (paragraph 5.22). On the map on page 67 it is shown as being in the yellow zone where heights of 5-6 storeys might be acceptable.

June 2022 Pre-Submission Version Draft Local Plan

The 2022 Pre-submission Local Plan proposes to allocate the site for 158 units plus a 300 bed hotel.

Our Comments on this Site

This site extends to 0.9 hectares. If a large hotel occupied two-thirds of the site as mentioned by the Council, 158 units on the remaining 0.3 hectares would represent a density of 527 dph. 158 dwellings on 0.45 hectares (half of the site) would represent a density of about 350 dph. If the whole site was to developed at the density recommended in the SDF, it would yield about 158 units and no hotel.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Nigel Fisher</b> (19542177)
<b>Organisation:</b> Brett A2Dominion Group

<b>Response ID:</b> 1122487
<b>Policy / Evidence Base / Part of Plan:</b> ST4/019 (Former Debenhams Site, High Street)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
ST4/019: 35-45 High Street, Staines (Debenhams Site) 2019 Preferred Options – 250 Units In the November 2019 Preferred Options this site was identified as having potential for 250 dwellings, representing a density of 900 dph. The proposed allocation noted that: The site is well-located within Staines Town Centre, with local services and employment within walking distance. Given the existing character of the area the site could accommodate high density, high rise development, in line with the preferred spatial strategy. This would however put additional pressure on local services therefore local infrastructure would need to be improved. The introduction of high rise residential use could facilitate the improvement of the visual appeal of the site through high quality design. This is particularly significant given the site’s prominent corner location on the High Street. The site generally performs well against the SA but mitigation would be required to reduce the impacts of the increased cumulative concentration of residential dwellings in the area (in association with ST4/009). The site is subject to several non-absolute constraints but these are considered to be mitigatable. The site could accommodate mixed commercial and residential use. Nearby emerging schemes have set a precedent for this character of

development within the town centre given the efficient use of land and sustainable location. The site could potentially achieve approximately 250 units, with retail/commercial use at the ground floor to maintain an active frontage on the High Street. There may be scope to include the community centre to the south as part of the redevelopment.

#### June 2022 Recommendation for Refusal – 226 Units

The application was refused in accordance with the officer's recommendation on 1 June 2022. The Officer's report for the proposal – which was up to 15 storey high – stated:

This planning application proposes the redevelopment of the site to provide 226 Build-to-Rent dwellings in the form of 2 towers above a podium, with two commercial uses on the ground floor, together with car and cycle parking, hard and soft landscaping and other associated works, following the demolition of the existing building.

The proposal would provide 226 new homes in an accessible location within Staines Town Centre, in accordance with a need for housing both locally and nationally. The proposal is also considered to be acceptable in relation to flooding, contaminated land, renewable energy, biodiversity, parking and highway grounds, drainage, impact on the amenity of future occupants and have an acceptable impact on the amenity of neighbouring properties. However, the proposal is considered to be unacceptable in regard to density, height, design and appearance, as it does not relate to the local context or the local character and identity. It is not considered to be an appropriate building type for this particular site and does not offer a specific destination. In addition, the proposed development would adversely impact heritage assets, in particular the significance of a number of listed buildings and the character and setting of the Staines Conservation Area. In addition, it is considered to impact the Egham Hythe Conservation Area and the settings of locally listed buildings.

The south-east tower, because of its size and dominance in the street scene is considered to have an impact on the public use and enjoyment of the River Thames and the Memorial Gardens.

In addition, the proposed development does not comply with the Council's Affordable Housing policy and the applicant has not satisfactorily justified the reduction they have sought.

Finally, whilst there is a significant social benefit resulting from the provision of housing and some economic benefits of the proposal associated with the construction and provision of two commercial units, overall, the adverse impacts of the proposal would significantly and demonstrably outweigh the benefits.

#### April 2022 Staines Development Framework

In the 2022 Staines Development Framework the site is noted as having potential for 'medium density' development with guidance of average densities up to 175 dph (paragraph 5.22).

#### June 2022 Pre-Submission Version Draft Local Plan

In the Pre-submission draft Local Plan, proposed allocation ST4/019 (Former Debenhams Site, High Street) estimates the capacity of the site to be 150 units.

Our Comments on this Site

On a site of 0.27 ha, 150 units represents a density of 555 dwellings per hectare. If the site was developed at the density recommended in the SDF, it would yield approximately 48 dwellings.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Nigel Fisher</b> (19542177)
<b>Organisation:</b> Brett A2Dominion Group

<b>Response ID:</b> 1122493
<b>Policy / Evidence Base / Part of Plan:</b> ST3/012 (Staines Telephone Exchange, Fairfield Avenue)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
<p>Planning application 20/01199/FUL sought permission for “Demolition of the former Masonic Hall and redevelopment of site to provide 206 dwellings together with car and cycle parking, hard and soft landscaping and other associated works.” This was refused (a unanimous committee decision) contrary to the Officer’s recommendation in June 2021 for the following reasons:</p> <p>The proposal, by virtue of the height of the two towers and inadequate car parking, represent an unacceptable overdevelopment of the site resulting in a development which is:</p> <ol style="list-style-type: none"> <li>1) Out of character with the surroundings and fails to have due regard to the height of adjoining buildings and land, resulting in a development which would not make a positive contribution to the character of the area and the street scene and would have a detrimental impact on the character of the area and the street scene; and</li> <li>2) Is likely to result in unacceptable parking stress on residential roads in the locality which would be detrimental to the amenity of residential properties, contrary to Policies EN1(a) and CC3 of the Spelthorne Borough Core Strategy and Policies Development Plan Document, 2009 and the Parking Standards Supplementary Planning Guidance, 2011.</li> </ol>

The scheme was approved at appeal (APP/Z3635/W/21/3280090 dated 17 January 2022) where the Inspector noted that:  
17. The reason for refusal in respect of character and appearance only refers to height and the Council's planning witness confirmed that this is the only matter between the parties on the first reason for refusal. This is also confirmed in the Statement of Common Ground (SoCG) between the Council and the appellant. The Council does not object to the design of the proposed buildings, apart from their height. The Council does not object to buildings on the site which would be taller than surrounding buildings per se, but considers that the buildings in this proposal are too tall and harmful.  
76. The benefit of providing homes in an area of under-delivery of housing and where there is not a five year supply of housing land, adds significant weight in favour of the scheme. Making beneficial use of a prominent town centre site which has been unused for a number of years and which detracts from the character and appearance of the area, also adds significantly to the case for the proposal. I have set out a number of other benefits of the proposal which add varying degrees of weight in the overall balance.  
In the preferred options site allocations this site is stated as having an area of 0.32 hectares. On that basis this density would be 644 dwellings per hectare, significantly in excess of the guideline density in the SDF.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Tanja Fisher (42025921)</b>
<b>Organisation:</b>

<b>Response ID: 1124620</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I have lived in Sunbury since 2017 and love the area. We are blessed with access to public parks and the proximity of the river, but I have noticed how little community and recreational centers we have. There is a lot of talk about the development of Kempton Park, and as usual it seems big housing developers are trying to get in on the action, attempting to squeeze as many houses in as possible. This would absolutely cripple the local infrastructure, which can't even deal with events such as Hampton Court Flower Show or the endless roadworks on Thames Road. I would like you to consider developing the Kampton Park grounds in a way where it continues to benefit the wider community, by offering employment opportunities,work placements/summer holiday jobs, recreation, events, nature walks, exercise and more.

Due to the existing car park and proximity to Sunbury station, the grounds are perfect for something groundbreaking and exciting, Here some ideas:  
(Please see attached document)

**Question 6:** You can upload any modifications below.

Fisher\_ Tanja - Supporting document.docx

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/603806/DOCX/-/Fisher%5F%20Tanja%20%2D%20Supporting%20document%2Edocx>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Paul Fitzpatrick (42100513)</b>	
<b>Organisation:</b>	
<b>Response ID: 1119436</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
LGS:ASHFORD TOWN:QUEENS WALK It has come to our attention you want to build on our field. This green space has been used by children for decades to play football and other sports. Every one walks there dogs here aswell. We also use this communal space for jubilee and other important community events. There is a lot of wildlife we see birds foxes and hedgehog all the time. Please define this land as LOCAL GREEN SPACE to stop developers buying this land for profit and squashing more residents into an already over busy area.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	



**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Alison Fox (19755937)</b>	
<b>Organisation:</b>	
<b>Response ID: 1124061</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>I support the draft Local Plan. More specifically, I support the exclusion of the Kempton Park estate as a prospective site for residential or other development.</p> <ul style="list-style-type: none"> <li>* Kempton Park has been shown in two recent Green Belt Reviews by an external consultant to be strongly performing Green Belt.</li> <li>* Any housing development on Kempton Park would badly affect the character of the areas surrounding the Kempton Park estate.</li> <li>* There would be huge traffic congestion Staines Road East, at Hampton Court Bridge, Hampton and Sunbury Cross, if there were to be a housing development on Kempton Park on the scale desired by the Jockey Club.</li> <li>* All other currently overburdened infrastructure in the immediate area would also be under extra pressure.</li> </ul>	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	
<b>Question 6:</b> You can upload any modifications below.	

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Terry Francis (41669281)</b>
<b>Organisation:</b>

<b>Response ID: 1124245</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
I am against all development at kempton
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No Response
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Michael Fuller (42010753)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117506</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
LGS: Ashford Town: The Wickets The small corner of The Wickets contains within a play area for the local children and grassed area for play or picnics. Within its boundary are several large trees including a London Plane tree these are important for wildlife and biodiversity. It is important these areas of green space are retained for the use of the local community no matter how small.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Alex Gadd (42025025)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117823</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
LGS: Ashford Town: Queens Walk I live in TW153JF and would like to express my view on protecting the green space here. We use the field behind our house for many reasons including exercise; getting our son to sleep walking around; dog walking and recently the jubilee party which allowed us to meet many people in the neighbourhood. It's also nice to see other people use the green space outside our bedroom window. I would like this to continue in the future.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	



**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Ivy Gale (42024897)</b>
<b>Organisation:</b>

<b>Response ID: 1117820</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Local green space - Fairholme Road/Perkins Court Ashford I am the owner of 3 perkins court and received a leaflet through my door about the green space in front of my property. I just wanted to write to express my support for the space to be designated as a local green space and protected from destruction and/or development. The space is covered in trees and is a hub for wildlife. We often spend hours watching the nesting birds, the cats that like to sleep under the bushes and the dogs that pass by. We are elderly and have an elderly dog, and the space is great for us to just wander out and let our dog have a sniff and go to the toilet. There are not many green spaces or even trees left in the local area, and it would be disastrous to see this removed.
<b>Question 6:</b> You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Lily Galek (42140321)</b>
<b>Organisation: Danescroft Land ICP Partnership Ltd</b>

<b>Response ID: 1119935</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: These representations identify that as currently prepared the Draft Local Plan is un-sound as it fails to meet the test of soundness as set out in the NPPF (2021). This failure is manifest in several ways but most notably the plan is not positively prepared
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Not justified, Not effective, Not consistent with national policy - were also selected.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
The plan is not justified as it does not take account of appropriate alternatives in the release of land from the Green Belt. 1.6 The plan is unlikely to be effective as the deliverability of certain allocated sites for development is challenged and the plan fails to deliver development in a number of areas of need, including that around Shepperton and Upper Halliford. 1.7 Based on the above, the Local Plan is not considered to accord with national policy. Paragraph 35(a) states that plans are sound if they are:	

“positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development...”

3.3 The most telling evidence that the Draft Local Plan has not been positively prepared is perhaps the Foreword of the Plan. The last paragraph of the Foreword reads: “There are no councillors who would willingly endorse every aspect of this Plan and the net effect will be to increase housing densities and make Spelthorne a less attractive place to live...”

The Foreword seeks to explain the difficulty the Council has had in preparing the Draft Local Plan up to Reg 19, particularly in the context of the Government’s ‘brutal’ housing targets. In doing so, it highlights the negative context in which the Plan has developed. The Foreword details the “divisive, bruising and at times unpleasant” journey to the Draft Local Plan which is explained to have “turned councillors against each other”.

#### Proposals to Remedy the Plan

4.1 Sections 2.0 and 3.0 of these representations identify why the current draft Plan should be found unsound. Strong reasons have not been provided to justify the unsustainable strategy that is proposed to meet the housing need in the borough as required by the NPPF. Indeed, it appears the proposed strategy in the draft Plan has been adopted in an attempt to reach the Government’s housing need figures without much regard to the bigger picture.

4.2 We recommend that for the plan to be sound, the strategy of the Draft Local Plan should be amended to increase the number of sites that can be allocated for development that directly meet the needs of the borough (e.g., those that can provide affordable homes, family homes and care bed spaces).

4.3 Utilising the evidence previously prepared and published as part of this consultation by the Council, we recommend that in order for the Plan to be found sound, the strategy is amended to allocate further greenfield sites including additional release of weakly performing Green Belt land. This should involve reconsideration of Sunbury Golf Course for development as we do not consider that review of this option (and the Council’s consideration of sites that could be released from the Green Belt) is based on proportionate, accurate and robust evidence. Rather, in our view, we consider that the northern portion of site B can be considered weakly performing Green Belt and this helps to underpin the rationale for allocation.

4.4 The allocation of further greenfield sites would ensure higher housing delivery over the Plan period and enable delivery of larger, suitable sites which would in turn achieve higher deliverability of affordable housing and family homes with gardens in addition to much needed care bed spaces. We therefore invite the Inspector to request that Spelthorne reviews draft Policy ST2.

4.5 We set out below more information on our client’s site to demonstrate its suitability, availability and deliverability. Sunbury Golf Course

4.6 Enclosed at Appendix 2 of these representations is a Vision Document which has been prepared to set out what could be delivered on our client’s site at Sunbury Golf Course. The Vision identifies the site, its location, opportunities, constraints and provides a conceptual masterplan for development of the site.

4.7 As stated above, the site (ref. HS1/013) was assessed by the Council’s evidence base as part of this Reg 19 consultation (Officer Site Assessments – Discounted Alternative Allocation Sites, June 2022). For clarity, our client proposes to develop site B (East portion of the Golf Course) which extends to

approximately 21.5ha with only the northern portion of the site proposed for residential development, extending to approximately 8.5 ha. The enclosed Vision Document (please refer to Appendix 2) has been updated since the previous representation and is based on this site area which could be brought forward within the first 5 years of the Plan. Sunbury Golf Course : Representations to Regulation 19 Consultation Pg 13 Benefits of an Allocation 4.8 Allocating land and bringing forward development at Sunbury Golf Course and releasing this from the Green Belt will deliver a number of benefits for Spelthorne including:

1. Delivery of up to 300 new homes in a sustainable location (please refer to Appendix 3).
2. Delivery of additional homes in the first 5 years of the plan period.
3. Provision of a housing mix which aligns with the identified need – including a mix of homes including four and five bed detached family homes.
4. Delivery of up to 50% affordable housing in accordance with the requirements of emerging Policy H2 making a significant contribution towards the chronic undersupply of affordable homes.
5. A new care home on site to deliver much needed care bed spaces.
6. A new 13 ha country park which will be open for all members of the public to use and retained in perpetuity and will include the provision of at least 10% Biodiversity Net Gain.
7. Creation of a high number of jobs directly through construction of the site (and indirect economic benefits through construction and expenditure of suppliers).
8. Ability to provide robust Green Belt boundaries with defensible and permanent boundaries available on all four sides of the site.

A substantially large document has been submitted, therefore please refer to the attached document for the in depth reps.

**Question 6:** You can upload any modifications below.

65267 - Sunbury Golf Course Reg 19 Representations - 16-09-22\_LO\_RES.PDF

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/590465/PDF/->

[/65267%20%2D%20Sunbury%20Golf%20Course%20Reg%2019%20Representations%20%2D%2016%2D09%2D22%5FLO%5FRES%2EPDF](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/590465/PDF/-/65267%20%2D%20Sunbury%20Golf%20Course%20Reg%2019%20Representations%20%2D%2016%2D09%2D22%5FLO%5FRES%2EPDF)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Our representations raise a number of complex issues concerning both overall plan strategy as well as site specific matters which would benefit from discussion with the Inspector and other interested parties.



<b>Respondent: Mr Nick Gething (19531777)</b>
<b>Organisation: Spelthorne BC Councillor</b>

<b>Response ID: 1117912</b>
<b>Policy / Evidence Base / Part of Plan: Policy E5: Open Space and Recreation</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Please find the attached detailed submission for Local Green Space, the submission contains location map, photo, reason and contact details. This location is critical to be protected, and is highly valued by local residents. Furthermore: We note that the Council Local Plan Team has included the following sites for designation as Local Green Spaces and to receive the formal planning protections that such designation affords them:- 1. The open Space at the Brooklands Development off Church Road, Ashford; 2. Scott Freeman Green on Stanwell Road, Ashford 3. The recreation land at the Wickets, Ashford.



We agree that these locations are critical to be protected, and are highly valued by local residents and fully support these designations.  
I would also like to take the opportunity to thank you for all your hard work on the local plan, this is appreciated by the residents of Spelthorne.  
I would also like to take the opportunity to thank you for all your hard work on the local plan, this is appreciated by the residents of Spelthorne.

**Question 6:** You can upload any modifications below.

Gething, Islam, Ramlakhan - Opposite St. Hildas Church on Stanwell Rd.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619722/PDF/-/Gething%5F%20Islam%5F%20Ramlakhan%20%2D%20Opposite%20St%2E%20Hildas%20Church%20on%20Stanwell%20Rd%2Epdf>

Gething, Rybinski - LDF Connaught AshT\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619723/PDF/-/Gething%5F%20Rybinski%20%2D%20LDF%20Connaught%20AshT%5FRedacted%2Epdf>

Gething, Islam, Ramlakhan - St Hildas Churchyard.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619724/PDF/-/Gething%5F%20Islam%5F%20Ramlakhan%20%2D%20St%20Hildas%20Churchyard%2Epdf>

LDF Ashford Close AshT 2209p NI\_NG\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619725/PDF/-/LDF%20Ashford%20Close%20AshT%202209p%20NI%5FNG%5FRedacted%2Epdf>

LDF Echleforde Park AshT 2209p NI\_NG\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619726/PDF/-/LDF%20Echleforde%20Park%20AshT%202209p%20NI%5FNG%5FRedacted%2Epdf>

LDF Fairholme Road AshT 2209p NI\_MR\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619727/PDF/-/LDF%20Fairholme%20Road%20AshT%202209p%20NI%5FMR%5FRedacted%2Epdf>

Gething, Islam, Ramlakhan - Land either side of entrance to West Close.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619728/PDF/-/Gething%5F%20Islam%5F%20Ramlakhan%20%2D%20Land%20either%20side%20of%20entrance%20to%20West%20Close%2Epdf>

Gething, Islam, Ramlakhan - Land on Village Way.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619729/PDF/-/Gething%5F%20Islam%5F%20Ramlakhan%20%2D%20Land%20on%20Village%20Way%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Roberto Giordanelli (40364353)</b>
<b>Organisation:</b>

<b>Response ID: 1124077</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Green Belt: Sunbury Common: Groveley Road I write to protest regarding the plan to build on the fields behind the Running Horse Public House. 'In-filling' ie squeezing more buildings and development into suburban residential areas is an abomination, and local councils who permit it are a disgrace. In-filling destroys the local environment, it is ugly, it adds to traffic congestion, parking problems and creates more pollution (from people, buildings and vehicles). Furthermore, overcrowding overburdens already ineffectual and overloaded infrastructure. All of the above is obvious, and it is ridiculous that I need bring this to anyone's attention. No residents want in-filling; whether they have the energy to complain or not. Any survey will show that in-filling is objectionable.

Adding more buildings in gardens, fields, open spaces and in other inappropriate areas benefits developers - whom the council does not serve - at the expense of the residents - whom it does not.  
For countless reasons, open spaces – whether large or small – are precious. Once they are gone, they are gone forever.  
If the UK must build its target 300,000 new homes per annum to meet a rising population, the ghastly urban vandalism that is in-filling is not the answer. The target numbers are too big for in-filling. Anyone who is in favour of such a massive building programme will know that new towns are the answer, not the destruction of existing towns.  
Of course, I expect the above comments to be ignored; unfortunately being disregarded is the way with objections to inappropriate development.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Moreen Glanville (42026369)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117864</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
LGS: Ashford Common: Chessholme Road I am strongly against the idea of any type of development on our much loved green area. My house, which I have lived in for 64 years (since built), is overlooking the beautiful green. Most residents, like myself, have made the decision to live in Chessholme Road mainly based on the green area. Families enjoy socialising, children enjoy playing and dogs enjoy their walks, yet alone the lovely view it provides. If there was a development this would devalue our property price considerably. and deprive resistance of all the pleasure our green brings.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Philip Goater (41992065)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117259</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E4: Environmental Protection	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
My concern is that insufficient attention has been given to measuring and reducing traffic pollution levels in the area around Nursery Road which affects a significant number of school children. While acknowledging the need to reduce it the policies outlined appear to be encouraging yet more slow moving traffic in the area at critical times.	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Dave Goodin (41984737)</b>
<b>Organisation:</b>

<b>Response ID: 1117180</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I would like to register my concern about any change to the use of the small green area in Chessholme Road tw15. This is a small space with mature trees where birds return each year to nest and accommodate squirrels too. The children from the cul de sac play on the little green and residents have enjoyed the peaceful area for years. My family live here and my parents before us so in excess of 50 years we and all neighbours enjoy the beautiful green. Please protect it.
<b>Question 6:</b> You can upload any modifications below.
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Clare Gouldstone (41904513)</b>
<b>Organisation: Nature-Connected Neighbourhoods</b>

<b>Response ID: 1115646</b>
<b>Policy / Evidence Base / Part of Plan: Policy E5: Open Space and Recreation</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
I am writing to you as a local resident and as someone who regularly enjoys the Green Space in Spelthorne, as well as the founder of Nature-Connected Neighbourhoods CIC. Nature-Connected Neighbourhoods CIC was launched after witnessing the catastrophic declines in biodiversity and seeing firsthand the scientifically-proven benefits of biodiversity on human physical and mental wellbeing. We face a number of crises simultaneously, notably climate change, ecosystem collapses, social justice and mental health. Green space goes a long way towards addressing all of these challenges. Plants in healthy soil help in both the mitigation of and adaptation to climate change, which will likely create the single biggest pressure on housing and businesses if left to proceed without urgent measures. In order for our flora and fauna to adapt to a changing

climate, they need to be mobile, which means not having fragmented habitat. Our flora and fauna help to regulate the earth's systems, including the carbon and water cycles. They help to alleviate flooding and extreme heat.

You will no doubt have heard of green prescriptions for patients of the NHS. Access to and connection with wilder nature is a fundamental element of human wellbeing and can be very effective in reducing blood pressure, boosting the immune system, alleviating stress, depression and anxiety and hence reducing the burden on public finances. However, easy access to such spaces is sadly not available to all. Removing Green Space deepens the inequality of access. As an example, nature-connectedness helps with people affected by social isolation - not just by providing social meeting points, but also through the effects of connection to wider nature.

I welcome the Council's accepted sites for LGS designation in its 'Local Green Space Review of submitted spaces' of January 2022

I am concerned at the Council's rejection of 41 sites including school playing fields, private sports grounds, allotments, Green Belt areas and other PUOS sites.

I call on the Council to protect as Local Green Spaces all the remaining protected urban open spaces (PUOS) that are still in existence and have not as yet been built on (nor are currently being built on) including school playing fields, private sports grounds, allotments, the Staines Reservoir Aqueduct, Stanwell Quarry, Duncroft, Wraysbury Road in Staines, the Grounds of Sunbury Court and Spelthorne Grove in Ashford.

I call on the Council to protect the 19 Green Belt areas and other rejected sites that were proposed by residents as Local Green spaces due to their particular importance to the local community.

I would be very happy to discuss this further and the benefits of nature-connected neighbourhoods and ways that this can be achieved.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Mark Green (41983457)</b>	
<b>Organisation:</b>	
<b>Response ID: 1124260</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
You should all be ashamed of yourselves , if you pass this planning ! Green Belt is sacred ! Stop building , stop immigration , keep our GREEN & Pleasant land ! This will be outrageous!!! (Please see attached document for related bat chart).	
<b>Question 6:</b> You can upload any modifications below.	
Green_ Mark <i>bar chart</i> (1).docx <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/602312/DOCX/-/Green%5F%20Mark%20%5Fbar%20chart%5F%20%5F1%5F%2Edocx">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/602312/DOCX/-/Green%5F%20Mark%20%5Fbar%20chart%5F%20%5F1%5F%2Edocx</a>	



<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: William Greenfield (25740609)</b>
<b>Organisation:</b>

<b>Response ID: 1112924</b>
<b>Policy / Evidence Base / Part of Plan: RL1/011 (Land at Staines and Laleham Sports Club, Worple Road)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
I feel that as this land abuts other open land to the east, it should be retained and not developed.
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No Response
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response





<b>Respondent: Mrs Jennifer Gregory (19568033)</b>	
<b>Organisation:</b>	
<b>Response ID: 1124258</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
I wish to register my objection to the council removing the protection from Green Belt to build housing. We have plenty of be houses in Spelthorne with more being built all the time. We will need our green spaces even more for our active well being as as our mental well being. If you remove their protection where will people go for recreation? Where will family who live in apartments play? Where will the dog walkers walk their dogs? Not every one has a car and can travel. It is nice to meet a stranger on a walk and talk	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Angela Griffiths (41802305)</b>
<b>Organisation:</b>

<b>Response ID: 1122506</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
As a 53 year old women, living in Staines now for around 20 years, the number of new homes and people moving in to our small town in the next 15 years feels scary and a little unsettling. That said, having looked at the plans now in quite a bit of detail (And wise words from my 16 year old daughter about the town becoming more modern and vibrant) I can at least appreciate a lot of the potential changes. Hope at least one person in the office appreciates the above sentiment, as I'm sure you have more than a headache over the amount of change expected of the borough from external forces. Just trying to go with the flow if it's all, or in part, going ahead and try and see things more positively . On a practical level, having spent a fortune on changing the landscape of Staines, history should be mentioned as the first consideration to the number of properties people invest their hearts and cash in. It was only less than 5 years ago; we were wading knee deep in water in multiple areas in

Staines. Properties flooded and lives turned upside down.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Angela Griffiths (41802305)</b>	
Organisation:	
<b>Response ID: 1128564</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy SP1: Staines-upon-Thames	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>Important stuff</p> <ul style="list-style-type: none"> <li>* Wheelchair drop off &amp; pick up point in town centre</li> <li>* Adequate parking</li> <li>* Whole town centre project from train station both sides of track with hard landscaping designed for free flow of wheelchair use to all areas of town and riverside</li> <li>* Park and ride from a hard standing area of Heathrow?</li> </ul>	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Angela Griffiths (41802305)</b>	
Organisation:	
<b>Response ID: 1122502</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Centre of excellence - For everyone - Sports	
<ul style="list-style-type: none"> <li>• Provision for the disabled to be able to participate in any sport, anyone else has access to</li> <li>• Rowing clubs</li> <li>• Great provision of sports facilities - which we have indoors and outdoors</li> <li>• Cycle lanes? Not sure where they can fit? - Safety issue</li> <li>• Running/wheelchair tracks around fields/outdoor spaces, people can use for free</li> </ul>	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Angela Griffiths (41802305)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122500</b>	
<b>Policy / Evidence Base / Part of Plan: Policy EC4: Leisure and Culture</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
* A theatre for productions would be amazing (And could incorporate acting / dancing / singing lessons during the day foa all) but where would the theatre fit and where would people park?	
* Shepperton Studios expansion nearby- good source of job possibilities (United extras employ people for extra work) and by the look of the expansion, they could be needing more than a few extras.	
* Could Shepperton Studios incorporate a theatre? Could they do studio tours? Extra jobs?	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Angela Griffiths (41802305)</b>
<b>Organisation:</b>

<b>Response ID: 1122507</b>
<b>Policy / Evidence Base / Part of Plan: Policy ID1: Infrastructure and Delivery</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
<p>So my negatives among the positives</p> <ul style="list-style-type: none"> <li>• Spelthorne - Sat on a floodplain (Sure there are legal issues if you dig deep about putting concrete on a floodplain)? Read something on the plan about putting measures in to stop flooding. What will that look like and will it really work?</li> <li>• Sewage can the underground system currently in place cope with the extra waste. Is the underground architecture sound and in good shape? Where will it end up?</li> <li>• Water pressure?</li> <li>• Car/vehicle congestion= pollution</li> <li>• Enough schools to support our young people and teachers that work hard to keep our children stimulated and safe for most of the day, 5 days a week</li> <li>• Enough childcare provision sites</li> </ul>

- Enough Doctors - The general practitioners that are our first point of call (That are not stretched to the point that they want to get out of the business of helping us all)
- Enough DENTISTS - Anyone ever had a toothache to the point they want to hammer their head on the wall?
- FOOD - Do we have enough supermarkets/food retail outlets - If Tescos Ashford and Sunbury are having lots of extra accommodation built on their already packed car parks, could be a situation?
- Where will lorries park to deliver goods/food to shops in Staines.
- Enough provision for any antisocial behaviour with a growing population, how will that look?
- Trains already busy, especially at peak hours, or seasonal for Thorpe Park, from Staines station - will there be more trains?
- Plenty of provision in town centre for bins - they have to sit somewhere
- Extra provision for cleaning of town centre - currently first thing in the morning the town centre is covered in rubbish and looks dirty
- Residential parking allocation?

I read that we will see what will be going ahead before some of the above can be looked at in more detail but consideration for possibilities would be reassuring. (Schools and childcare facilities take up a considerable amount of land space)

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Laura Grove (41657793)</b>	
<b>Organisation:</b>	
<b>Response ID: 1124231</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
I understand that there are plans to build 200 homes on the Running Horse green belt land. I am a resident at Hallows Grove which is opposite the pub and one of the reasons I bought my flat 18 years ago was because of the natural green space surrounding the property (allotments to the right and fields opposite). The thought of building on this area saddens me immensely as it will really change the landscape of the area, will create more noise/traffic and there is very little green space left in Sunbury without destroying more of it. I therefore oppose this development and would appreciate being kept up to date with any decisions that are made surrounding this site.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Bartosz Gryszczynski (41992289)</b>
<b>Organisation:</b>

<b>Response ID: 1119435</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
LGS: Ashford Common: Chessholme Road A few days ago, my local councillors told me that a new master plan for the Borough may re-define small amenity spaces, and the developer might buy a Local Green Space on my road to accommodate new houses or even a block of flats. As crazy as it sounds, the idea made me write this short letter. I moved to Chessholme 8 years ago from Bedfont, and our house was the only one we viewed. I just loved the place, the house was ok, but the big lawn with majestic trees sold the idea of finding a Home. I love watching through my windows changing the colours of leaves, squirrels trying to find acorns, and foxes sitting in the dark watching passing cars.

I still take a picture when the rainbow shines above the trees and send it to my parents in Poland to show them what a beautiful place in England I found myself with my family.  
We meet our neighbours and have a little chat, kids running on the grass having the time of their life (Not sitting on the mobile phones or in front of the TV for a change).  
Some neighbours take the dog for a quick walk, and kids have a chance to stroke their fur and throw a ball for them.  
I know nowadays everything has got its price. But because you can sell or do something, you should ask yourself: Is it right?  
So my request to Spelthorne Council is: please do the right thing and leave our Local Green Space - green forever.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent:</b> Mr James Guthrie (41857985)
<b>Organisation:</b> Valor Real Estate Partners LLP

<b>Response ID:</b> 1120900
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Our view as to why the Local Plan is unsound relates to the draft allocation of site SN1/005 for residential use. Please refer to the accompanying representation letter for our detailed response.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
In order for the Local Plan to be considered sound, site SN1/005 should be allocated for employment purposes and not residential use. Please refer to the accompanying representation letter for our detailed response.
<b>Question 6:</b> You can upload any modifications below.
Quod Spelthorne Representations 20220909 (1).pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/af/1409506/619796/PDF/-/Guthrie_%20James_%20Redacted%20-%20Quod%20Spelthorne%20Representations%2020220909%20_1.pdf">https://spelthorne.inconsult.uk/gf2.ti/af/1409506/619796/PDF/-/Guthrie_%20James_%20Redacted%20-%20Quod%20Spelthorne%20Representations%2020220909%20_1.pdf</a>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: We would like to reserve the right to attend the hearings to ensure the soundness of the Plan in relation to the proposed allocation of site SN1/005.

<b>Respondent: Mr Suraj Gyawali (41217313)</b>
<b>Organisation:</b>

<b>Response ID: 1111823</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Local Green Space : Sunbury Common: Catherine Drive Along with usual benefits to the local neighbourhood of having open green space for childrens to play, improve air quality and so on, one really important factor to prevail to keep green space came into limelight. In the heat wave earlier this week, according to Sky news analysis of the heatmap, only the area around the Green was Amber, the rest of the areas were dark red. In fact, the majority of the Sunbury common area were dark red. As the temperature is climbing significantly from the last few years and expected to go higher in upcoming years, the Green space plays a vital role to balance the temperature. In case of emergency due to a fire, the salvage area.
<b>Question 6:</b> You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Stephen Haarer (41984673)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117179</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
I should like to comment on the local plan which you are consulting on. It would be great if you could designate the small park in The Wickets, Ashford as a Local Green Space. My family and the other residents use it extensively for childrens' play and it has become an essential part of the local community having been used for regular outside meetings such as an afternoon to celebrate the queen's jubilee.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Councillor Tony Harman (19532225)</b>	
<b>Organisation:</b> Spelthorne BC Councillor	
<b>Response ID:</b> 1119423	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Please find the attached detailed submissions for Local Green Space, the submission contains location map, photo, reason and contact details. These locations is critical to be protected, and is highly valued by local residents. I would also like to take the opportunity to thank you for all your hard work on the local plan, this is appreciated by the residents of Spelthorne.	
<b>Question 6:</b> You can upload any modifications below.	
LGS Staines Brookside Rd 2209p.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589119/PDF/-/LGS%20Staines%20Brookside%20Rd%202209p%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589119/PDF/-/LGS%20Staines%20Brookside%20Rd%202209p%2Epdf</a>	
LGS Staines Kingston Crescwent 2209p.pdf	

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589120/PDF/-/LGS%20Staines%20Kingston%20Crescwent%202209p%2Epdf>

LGS Staines Laleham Rd 2209p.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589121/PDF/-/LGS%20Staines%20Laleham%20Rd%202209p%2Epdf>

LGS Staines Leacroft 2209p.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589122/PDF/-/LGS%20Staines%20Leacroft%202209p%2Epdf>

LGS Staines Boundary Road 2209p.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589123/PDF/-/LGS%20Staines%20Boundary%20Road%202209p%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Paul Harridge (41921185)</b>	
Organisation:	
<b>Response ID: 1116159</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
I add support to protecting the above land as ' Local Green Space' for reasons stated below:- It is an area I can peacefully walk a dog. It is an area where parents can play with young children. It is an area wild birds flourish which improves my quality of life. It is an area allowing heavy rain falls to drain quickly unlike the adjoining Avenue which floods to a dangerous level endangering moving vehicles and pedestrians alike. I am strongly against future development on this biodiverse green space.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Susanne Harrison (41825281)</b>
<b>Organisation:</b>

<b>Response ID: 1114464</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Being a resident within this area I fully support your motion to introduce (LGS) to The Vale to give my fellow residents and myself more protection for small open green spaces. Furthermore, I would also like to add that The Vale's green space is very bland and lacking in Sustainability compared to other green spaces like Woodberry Close and Heatherlands. So therefore, I would like to suggest the addition of adding a tree or two to (1)make the space look more scenic, (2) To give greater sustainability to The Vale keeping in line with enhancing wildlife and green spaces within this Borough. (3) To Discourage parking on the green space from residents not using there driveway leading to more work from reseeding and upkeep because of using the land unfairly. Finally, I hope you consider this option as this will help the environment and enhance your mission statement of discouraging development in future.
<b>Question 6:</b> You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Susanne Harrison (41499585)</b>
<b>Organisation:</b>

<b>Response ID: 1112410</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
LGS/Sunbury Common [The Vale] Being a resident within this area I fully support your motion to introduce (LGS) to The Vale to give my fellow residents and myself more protection for small open green spaces. Furthermore, I would also like to add that The Vale's green space is very bland and lacking in Sustainability compared to other green spaces like Woodberry Close and Heatherlands. So therefore, I would like to suggest the addition of adding a tree or two to (1)make the space look more scenic, (2) To give greater sustainability to The Vale keeping in line with enhancing wildlife and green spaces within this Borough. (3) To Discourage parking on the green space from residents not using there driveway leading to more work from reseeding and upkeep because of using the land unfairly. Finally, I hope you consider this option as this will help the environment and enhance your mission statement of discouraging development in future.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Helen Harvey (42220321)</b>
<b>Organisation:</b>

<b>Response ID: 1120653</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Spelthorne Borough Council has a target from the government to build 618 homes per year for the next 15 years. The Council's housing register has also risen from 1,942 households to approximately 3,300 in the last 2 years, representing a serious housing crisis that the council must address. It is important for the Council to deliver more high-quality housing to let at affordable rents to local people. Spelthorne Borough Council Assets Team are working to achieve delivering this local housing across a number of strategic sites in the Borough. I support generally the provisions of the Plan However, I consider that additional brownfield sites may be available for development which could have the effect of reducing the impact of developing Green Belt sites for residential development within the Borough. One such site is the Summit Centre, Hanworth Road, Sunbury, TW16 5DA, an asset owned by Spelthorne Borough Council. This area of land is wholly outside the Green Belt. The site is brownfield, previously developed land at an accessible location. It is suitable, achievable and deliverable for housing development. In respect of density, I consider any development of the site could achieve in the region of 204-210 residential units, of low / medium scale, alongside an appropriate number of car parking spaces. This site is deliverable, achievable and will be available within 1-5 Years of the Plan. It will help meet the objectively assessed needs of the Plan and will therefore help achieve Plan-led objectives for sustainable development. Including this site

as an allocation would, in my view, satisfy the requirements for the plan to be 'positively prepared' and sound. I also consider that this allocation would be 'effective' in being deliverable / delivering sustainable development over the plan period. Finally, as a predominantly brownfield site, I consider that redevelopment for residential is 'consistent with national policy' - and will help enable the Local Plan in the delivery of sustainable development.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

I consider that the site can achieve up to 204-210 units, and that development be brought forward within the 1-5 Year timeline (2023-2027). I therefore request this allocation is in the Plan, with a suggestion that this is considered acceptable within a 1-5 Year timeline (2023-2027). The proposed inclusion is attached below: the site area is 1.82Ha (uploaded as a file).

**Question 6:** You can upload any modifications below.

summit centre.png

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/593596/PNG/-/summit%20centre%2Epng>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mrs Helen Harvey (42220321)</b>
<b>Organisation:</b>

<b>Response ID: 1123643</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Spelthorne Borough Council has a target from the government to build 618 homes per year for the next 15 years. The Council's housing register has also risen from '1.,942 households to approximately 3,300 in the last 2 years, representing a serious housing crisis that the council must address. It is important for the Council to deliver more high-quality housing to let at affordable rents to local people. Spelthorne Borough Council Assets Team are working to achieve delivering this local housing across a number of sites in the Borough. Some of these are strategic sites, whilst others are smaller, 'pocket sites' to help fulfil local need. I support generally the provisions of the Plan. However, I consider that additional sites may be available for development which could have the effect of reducing the impact of developing Green Belt sites within the Borough. Once such site is that land adjacent to the White House, Kingston Road, TW15 3SE, an asset owned by Spelthorne Borough Council. This area of vacant land is wholly outside the Green Belt. The site is brownfield, previously developed land, at an accessible location. It is suitable, achievable and deliverable for housing development. In respect of density, I consider any development of the site could achieve in the region of 17-20 residential units, of low / medium scale, alongside an appropriate number of car parking spaces.

This site is deliverable, achievable and will be available within 1-5 Years of the Plan. It will help meet the objectively assessed needs of the Plan and therefore will help achieve Plan objectives for sustainable development. Albeit a site of modest proportions, including this site would, in my view, satisfy the requirements for the plan to be 'positively prepared' and sound and may help less sustainable options of the plan, including residential development within the Green Belt, being progressed. I also consider that allocation of this site would be 'effective' in being deliverable / delivering sustainable development over the plan period.

Finally, as a predominantly brownfield site, I consider that redevelopment for residential is 'consistent with national policy' - and will help enable the Local Plan in the delivery of sustainable development.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

I consider that the site can achieve up to 17-20 units, and that development be brought forward within the 1-5 Year timeline (2023-2027). I therefore request this allocation is in the Plan, with a suggestion that this is considered acceptable within a L-5 Year timeline (2023-2027). The Red- Line Plan below to be used, with Blue indicating existing Hostel site owned by the Council (uploaded as a file)

**Question 6:** You can upload any modifications below.

Harvey, Helen - Red line amendment.png

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/600819/PNG/-/Harvey%5F%20Helen%20%2D%20Red%20line%20amendment%2Epng>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Helen Harvey (42220321)</b>
<b>Organisation:</b>

<b>Response ID: 1120642</b>
<b>Policy / Evidence Base / Part of Plan: Policy SP1: Staines-upon-Thames</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Spelthorne Borough Council has a target from the government to build 618 homes per year for the next 15 years. The Council’s housing register has also risen from 1,942 households to approximately 3,300 in the last 2 years, representing a serious housing crisis that the council must address. It is important for the Council to deliver more high-quality housing to let at affordable rents to local people. Spelthorne Borough Council Assets Team are working to achieve delivering this local housing across a number of strategic sites in the Borough. I support the provisions of SP1, which confirms that the key focus for development will be Staines Town Centre. I consider this suitable, sustainable and that further development will help sustain services and commercial development already within the town centre, enhancing vitality and viability and further helping foster enterprise. However, taking into account the draft Staines Development Framework (draft Framework), I consider that there is a contradiction with development aspirations of a number of sites within the town centre, such that this may threaten the relevant policies of the Plan being ‘positively prepared’. Critically, I consider the draft Framework may threaten the Plan meeting its ‘positively prepared’ objectively assessed needs, meaning it will not achieve sustainable development. As a consequence, the Plan may also not be ‘effective’ in being deliverable / delivering sustainable development to meet needs over the plan period.

Finally, the impact of the draft Framework may make the Plan not 'consistent with national policy' ' the Local Plan should enable the delivery of sustainable development at locations including town centres and the draft Framework may prevent the allocation of site achieving their true potential in the Plan, consistent with their Plan allocations.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

Reference to Policy SP1 must make clear that where there is discrepancy between the provisions of SP1 and the draft Development Framework, including those allocations covered within the Plan, that the provisions of the Plan, be it site specific allocations or SP1 over-ride the guidance in the draft Framework. If this is not made clear, the soundness of the Plan will be threatened in the delivery of much needed housing, included affordable housing, within Staines town centre

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Helen Harvey (42220321)</b>
<b>Organisation:</b>

<b>Response ID: 1120647</b>
<b>Policy / Evidence Base / Part of Plan: Policy H2: Affordable Housing</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Spelthorne Borough Council has a target from the government to build 618 homes per year for the next 15 years. The Council's housing register has also risen from 1,942 households to approximately 3,300 in the last 2 years, representing a serious housing crisis that the council must address. It is important for the Council to deliver more high-quality housing to let at affordable rents to local people. Spelthorne Borough Council Assets Team are working to achieve delivering this local housing across a number of strategic sites in the Borough. I support the provision of Housing within Spelthorne to meet objectively assessed needs, and as part of this, affordable housing. I agree that where proposals cannot meet the provisions of affordable housing set out in Policy H2, that they should be subject to viability testing. However, I consider that H2 needs clarity in respect of its reference to affordable housing on Build to Rent (BtR) proposals. Policy H2 (2e) suggests for BtR developments, that the proportion of affordable housing should be in line with benchmark levels set by the Council and follow any up-to-date evidence, plans or strategies. Critically, however it is not clear that this will apply to affordable / Discounted Rent Models (DMR), consistent with the treatment of affordable housing in Build to Rent schemes by other authorities (and also, for example, the GLA). This should be explicit in our view to avoid confusion and aid both understanding and application of H2. Not clarifying this may threaten the Plan meeting its 'positively prepared' assessed needs meaning it will not achieve sustainable development. The Plan may also not be

'effective' in being deliverable / delivering sustainable development over the plan period. Finally, the impact of not being clear in this policy in respect of BtR may make the Plan not' consistent with national policy'. BtR and affordable rent is typically set at 20Yo of unit numbers, with a 20% discount on market rates, being recognised by the Government and the NPPF as an acceptable form of affordable housing provision. As a benchmark, I recommend these parameters are used.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

Reference to the Policy H2 (2e) should clarify / make clear that Build to Rent (BtR) proposals can apply a Discounted Market Rent model (DMR) as an acceptable provision of affordable housing.

It is suggested this is set at 20%of total unit numbers, with a 20% discount on Market Rents applied.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Helen Harvey (42220321)</b>
<b>Organisation:</b>

<b>Response ID: 1120658</b>
<b>Policy / Evidence Base / Part of Plan: AT3/007 (Ashford multi-storey car park, Church Road)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Spelthorne Borough Council has a target from the government to build 618 homes per year for the next 15 years. The Council’s housing register has also risen from 1,942 households to approximately 3,300 in the last 2 years, representing a serious housing crisis that the council must address. It is important for the Council to deliver more high-quality housing to let at affordable rents to local people. Spelthorne Borough Council Assets Team are working achieve delivering this local housing across a number of strategic sites in the Borough. I support the provisions of Allocation AT3/007, which confirms the appropriateness of the former Ashford MSCP for development in the Plan. I also support the delivery of this site within the 1-5 Year timeline (2023-2027). This site is deliverable, achievable and immediately available: for this reason the allocation for the site to come forward in Years 1-5 is supported. As such I consider that this allocation is ‘positively prepared’ to meet the objectively assessed needs of the Plan and will therefore help achieve Plan-led objectives and sustainable development. I also consider that the allocation is ‘effective’ in being deliverable / delivering sustainable development over the plan period. Finally, as a brownfield, unused site, I consider that redevelopment for residential and ground floor commercial / community uses is ‘consistent with national policy’- the Local Plan should enable the delivery of sustainable development within Ashford town centre, delivering homes and ground floor activity to help sustain and enhance the town centre

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mrs Helen Harvey (42220321)</b>
<b>Organisation:</b>

<b>Response ID: 1120645</b>
<b>Policy / Evidence Base / Part of Plan: SE1/005 (Benwell House, Green Street)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Spelthorne Borough Council has a target from the government to build 618 homes per year for the next 15 years. The Council’s housing register has also risen from L,942 households to approximately 3,300 in the last 2 years, representing a serious housing crisis that the council must address. It is important for the Council to deliver more high-quality housing to let at affordable rents to local people. Spelthorne Borough Council Assets Team are working achieve delivering this local housing across a number of strategic sites in the Borough. I support the provisions of Allocation SE1/005, which confirms the appropriateness of the wider Benwell House site for residential development. I also support the delivery of this site within the 1-5 Year timeline (2023-2027). I do however consider the first bullet of the site-specific requirement should be re-phrased in respect of the reference to TPO’d trees. I understand that Tree surveys undertaken across the site, suggest that a number of trees, notably those on the ‘island site’, which is the principal area suitable for future development, are of poor health / quality and offer very little screening benefit. It is considered that any loss of these trees can be mitigated and both screening and an overall positive contribution to sustainable development can be achieved by a strong replacement planting regime which includes mature (+8m) tree specimens. For that reason, I suggest minor changes to this bullet to reflect this position. This site is deliverable, achievable and immediately available: for this reason the allocation for the site to come forward in Years 1-5 (2023-2027) is supported. As such, I consider that this

allocation is 'positively prepared' to meet the objectively assessed needs of the Plan and will therefore will help achieve Plan objectives and sustainable development. I also consider that the allocation is 'effective' in being deliverable / delivering sustainable development over the plan period. Finally, as a predominantly brownfield site, I consider that redevelopment for residential is 'consistent with national policy'. The Local Plan should enable the delivery of sustainable development, and this site is within a residential / flat area and in close proximity to Sunbury Railway station, bus routes along Green Street and within walking distance of Sunbury town centre.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

Whilst not required to make the Plan sound, I nevertheless suggest the first bullet of SE1/005 Site Specific Requirements is helpfully clarified such: 'Retain those trees under TPO which exhibit good health / future viability. Where this is not possible as a consequence of realising development of the allocation, it is expected that these will be replaced with mature (+8M) specimens as part of a comprehensive landscaping solution to the site.'

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Helen Harvey (42220321)</b>
<b>Organisation:</b>

<b>Response ID: 1120655</b>
<b>Policy / Evidence Base / Part of Plan: ST1/037 (Thameside House, South Street)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Spelthorne Borough Council has a target from the government to build 618 homes per year for the next 15 years. The Council’s housing register has also risen from 1,942 households to approximately 3,300 in the last 2 years, representing a serious housing crisis that the council must address. It is important for the Council to deliver more high-quality housing to let at affordable rents to local people. Spelthorne Borough Council Assets Team are working to achieve delivering this local housing across a number of strategic sites in the Borough, including within Staines town centre. I support the provisions of Allocation ST1/0037, which confirms the appropriateness of the (former) Thameside House site for mixed use residential led development, for approximately 140 units and 3,200sqm of Class E flexible commercial development. For the sake of clarity, flexible commercial proposals presently suggest up to 4,500sqm of E-Class (office led) development for the site, at its southernmost point (ie at the intersection of South Street and Thames Street). It is my view that the allocation should be amended to reflect this more up to date aspiration, which is driven by a proposed occupier of the office floorspace. I see no issue with this increase, in that the site is within the town centre and at an accessible location where such uses are supported. I also support the delivery of this site within the 1-5 Year timeline (2023-2027) This site is deliverable, achievable and immediately available: for this reason the allocation for the site to come forward in Years 1-5 is supported.

As such I consider that this allocation is 'positively prepared' to meet the objectively assessed needs of the Plan and will therefore help achieve Plan objectives and sustainable development. I also consider that the allocation is 'effective' in being deliverable / delivering sustainable development over the plan period. Finally, as a predominantly brownfield site, I consider that redevelopment for residential is 'consistent with national policy'- the Local Plan should enable the delivery of sustainable development and this site, being both within the town centre with its ease of access to services and facilities, and immediately opposite Staines Bus Station / at a highly accessible location.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

Whilst not required to make the Plan sound, I nevertheless suggest the flexible commercial floorspace of ST1/O37 in the allocation is updated to reflect latest proposals of 'approximately 4,500sqm'.

I see no issue with this, given the site's position within the town centre area and at a location which both supports town centre related development, such as office and other commercial space, and is accessible to services, facilities and accessible to public transport.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Helen Harvey (42220321)</b>
<b>Organisation:</b>

<b>Response ID: 1120657</b>
<b>Policy / Evidence Base / Part of Plan: ST3/004 (Oast House, Kingston Road)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Spelthorne Borough Council has a target from the government to build 618 homes per year for the next 15 years. The Council's housing register has also risen from 1,942 households to approximately 3,300 in the last 2 years, representing a serious housing crisis that the council must address. It is important for the Council to deliver more high-quality housing to let at affordable rents to local people. Spelthorne Borough Council Assets Team are working to achieve delivering this local housing across a number of strategic sites in the Borough. I support the provisions of Allocation ST3/004, which confirms the appropriateness of the Oast House / Kingston Road Car Park (34-36 Kingston Road) site for mixed use development comprising approximately 180 residential units, with community healthcare provision of approximately 4,500sqm. For the sake of clarity, proposals are also seeking modest ground floor commercial uses, including live / work units (possibly artists studios), alongside the refurbishment and re-use of the Oast House for community / arts use with future potential as a theatre use. Whilst these latter proposals are embryonic, it is my view that the allocation should be amended to reflect this, in the interests of clarity and future planning for the site. Elsewhere, I suggest a minor amendment in the test in relation to clarifying the reference to 'part listed'. It is understood the Oast and Oast House only are Grade II listed buildings. I suggest this minor amendment to the text (see below) to reflect this / better explain which elements of the site are listed.

I also support the delivery of this site within the 1-5 Year timeline (2023-2027). This site is deliverable, achievable and immediately available: for this reason the allocation for the site to come forward in Years 1-5 is supported. As such I consider that this allocation is 'positively prepared' to meet the objectively assessed needs of the Plan and will therefore help achieve Plan objectives and sustainable development. I also consider that the allocation is 'effective' in being deliverable / delivering sustainable development over the plan period. Finally, as a predominantly brownfield site, I consider that redevelopment for residential is 'consistent with national policy'- the Local Plan should enable the delivery of sustainable development and this site, being at an important edge of town centre location, with its ease of access to services and facilities, and strong connectivity to Staines Railway station

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

Whilst not required to make the Plan sound, I nevertheless suggest the following changes for clarity:

Site Description: The Surrey County Council buildings (adult learning centre at 34-36 and 36B) are vacant with part of the buildings Grade II listed, comprising the Oast and Oast House buildings.

Site Specific Requirements (bullet 3): Conserve and, where possible, enhance heritage assets and their setting, most notably the Grade II listed Oast and Oast House on site.

Site Specific Requirements (new bullet): Re-use of the Oast / Oast House for community / arts use with the future potential of as theatre use;

Site Specific Requirements (new bullet): ground floor commercial uses / artist studios / live work units

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Helen Harvey (42220321)</b>
<b>Organisation:</b>

<b>Response ID: 1120659</b>
<b>Policy / Evidence Base / Part of Plan: ST4/002 (Bridge Street Car Park, Hanover House &amp; Sea Cadet Building, Bridge Street, Staines)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Spelthorne Borough Council has a target from the government to build 618 homes per year for the next 15 years. The Council's housing register has also risen from 1,942 households to approximately 3,300 in the last 2 years, representing a serious housing crisis that the council must address. It is important for the Council to deliver more high-quality housing to let at affordable rents to local people. Spelthorne Borough Council Assets Team are working to achieve delivering this local housing across a number of strategic sites in the Borough. I support the principle of Allocation ST4/002, for the Bridge Street Car Park, Hanover House and the Sea Cadet Building. This confirms the appropriateness for development of the site for mixed use residential and hotel development. However, in respect of density, I would clarify the following as the latest proposals which have recently been considered and supported by the Council: 1. That the hotel development is proposed to be reduced from the previously anticipated 300 bedrooms to now a 205 bedroomed hotel, with 30 apart hotel units. These would be supported by 6 meeting rooms, restaurant, bar, gym, spa and parking. 2. As a consequence of the reduction in the hotel proposal, suggested residential for the site has increased to 235 residential units, with car parking. I therefore consider, whilst supporting the principle of development on the site, the emerging draft plan should reflect these changes. I consider the

residential development particularly, can now greatly exceed the suggested 158 units proposed in ST4/002 and the site could now achieve up to 235 residential units on site, subject to any restriction from the Heathrow Safeguarding Zone. I am also very concerned that the provisions of the draft Staines Town Centre Development Framework may prevent the viable development of this site, notably the Riverside Protection Zone proposed for the wider area.

It should be made clear in the policies of the Plan, and in respect of those sites which the guidance in the draft Framework covers, that the provisions of the Plan are not outweighed by the Framework guidance. I support the suggested delivery of this site in the 1-5 Year timeline (2023-2027). This site is immediately deliverable, achievable and will be available within 1-5 Years (2023-2027). With the exception of the density, I consider that the allocation is positively prepared' and subject to the changes suggested above I will withdraw my objection on this ground. A greater density on the site will help further meet the objectively assessed needs of the Plan and will reduce the pressure on taking land from the Green Belt for residential uses. The revised allocation will therefore further help achieve Plan objectives and sustainable development. I also consider that a revision to the allocation would be 'effective' in being deliverable / delivering sustainable development over the plan period and similarly would withdraw my objection to this, subject to the changes suggested in this representation. Finally, as a predominantly brownfield site, I consider that this development / redevelopment for mixed residential and hotel uses is 'consistent with national policy'- the Local Plan should enable the delivery of sustainable development given this site is within Staines Town Centre, with excellent access to town centre shops and services, and within close proximity to the Bus Station and within walking distance of Staines Railway station.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

I support the principle of Allocation ST41002, for the Bridge Street Car Park, Hanover House and the Sea Cadet Building. This confirms the appropriateness for development of the site for mixed use residential and hotel development.

However, in respect of density, I would ask the revision to the Plan clarify the following latest proposals:

1. That the hotel development is proposed to be reduced from the previously anticipated 300 bedrooms to now a 205 bedroomed hotel, with 30 apart hotel units. These would be supported by 6 meeting rooms, restaurant, bar, gym, spa and parking.
2. As a consequence of the reduction in the hotel proposal, suggested residential for the site has increased to 235 residential units, with car parking. I also request it should be made clear that this policy / allocation is not outweighed by the guidance contained in the draft Town Centre Framework

**Question 6:** You can upload any modifications below.

No Response



**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Helen Harvey (42220321)</b>
<b>Organisation:</b>

<b>Response ID: 1120668</b>
<b>Policy / Evidence Base / Part of Plan: ST4/026 (Communications House, South Street, Staines)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Spelthorne Borough Council has a target from the government to build 618 homes per year for the next 15 years. The Council's housing register has also risen from 1,942 households to approximately 3,300 in the last 2 years, representing a serious housing crisis that the council must address. It is important for the Council to deliver more high-quality housing to let at affordable rents to local people. Spelthorne Borough Council Assets Team are working to achieve delivering this local housing across a number of strategic sites in the Borough. I support the provisions of Allocation 5T4/026, which confirms the appropriateness of Communications House site for residential led development, for approximately 120 units. For the sake of clarity, I consider that there may be opportunity for ground floor commercial development of flexible E-Class use. It is my view that the allocation should be amended to reflect this. I see no issue with this, in that the site is within the town centre, where such uses should be supported. It will also give a less sensitive use at ground floor to residential, given the risk of flooding in the surrounding area. Also, for the sake of clarity, I consider that the site allocation should be extended to include the car park serving communications house. A slightly amended plan is included below showing this minor extension. I also support the delivery of this site within the 1-5 Year timeline (2023-2027). This site is deliverable, achievable and immediately available: for this reason the allocation for the site to come forward in Years 1-5 is supported.

As such I consider that this allocation is 'positively prepared' to meet the objectively assessed needs of the Plan and will therefore help achieve Plan objectives and sustainable development. I also consider that the allocation is 'effective' in being deliverable / delivering sustainable development over the plan period.

Finally, as a predominantly brownfield site, I consider that redevelopment for residential is 'consistent with national policy' - the Local Plan should enable the delivery of sustainable development and this site, being both within the town centre with its ease of access to services and facilities, and immediately adjacent to Staines Bus Station / in a highly accessible location.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

Whilst not required to make the Plan sound, I nevertheless suggest the insertion of 'opportunity for flexible E Class commercial ground floor floorspace' I also consider that the allocation should be extended to include the car park - as illustrated below by the broken red line (attached as an upload)

**Question 6:** You can upload any modifications below.

Communications centre.png

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/593623/PNG/-/Communications%20centre%2Epng>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Helen Harvey (42220321)</b>
<b>Organisation:</b>

<b>Response ID: 1120666</b>
<b>Policy / Evidence Base / Part of Plan: ST4/O28 (William Hill / Vodafone/ Monsoon, High Street)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Spelthorne Borough Council has a target from the government to build 618 homes per year for the next 15 years. The Council's housing register has also risen from 1,942 households to approximately 3,300 in the last 2 years, representing a serious housing crisis that the council must address. It is important for the Council to deliver more high-quality housing to let at affordable rents to local people. Spelthorne Borough Council Assets Team are working to achieve delivering this local housing across a number of strategic and smaller sites in the Borough, including within Staines town centre. I support the provisions of Allocation ST4/O28, which confirms the appropriateness of the William Hill / Vodafone / Monsoon site for a modest residential led development, for approximately 14 units, with ground floor commercial floorspace. However, I consider bullet point 3 superfluous, given the site is proposed 'car free' and is for a limited (up to 14 units) number of residential units. There is unlikely to be any meaningful impact on the local road network, nor is there any significant transport impact warranting a travel plan from the commercial uses, given these will largely remain in their retained form /with little added floorspace. I also support the delivery of this site within the 1-5 Year timeline (2023-2027) This site is deliverable, achievable and immediately available: for this reason, the allocation for the site to come forward in Years 1-5 is supported. As such I consider that this allocation is 'positively prepared' to meet the

objectively assessed needs of the Plan and will therefore help achieve Plan objectives and sustainable development. I also consider that the allocation is 'effective' in being deliverable / delivering sustainable development over the plan period.  
Finally, as a predominantly brownfield site, I consider that redevelopment for residential is 'consistent with national policy'- the Local Plan should enable the delivery of sustainable development and this site, being both within the town centre with its ease of access to services and facilities, and in close proximity to Staines Bus Station / in a highly accessible location.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

I suggest deletion of bullet 3 ie  
'Include measures to mitigate the impact of development on the local road network and take account of impacts on the strategic road network as identified through a site specific Travel Plan and Transport Assessment.'

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Helen Harvey (42220321)</b>	
<b>Organisation:</b>	
<b>Response ID: 1120644</b>	
<b>Policy / Evidence Base / Part of Plan: SE1/025 (Elmbrook House, Station Road)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>Spelthorne Borough Council has a target from the government to build 618 homes per year for the next 15 years. The Council's housing register has also risen from 1,942 households to approximately 3,300 in the last 2 years, representing a serious housing crisis that the council must address. It is important for the Council to deliver more high-quality housing to let at affordable rents to local people. Spelthorne Borough Council Assets Team are working to achieve delivering this local housing across a number of strategic sites in the Borough. I support the provisions of Allocation SE1/025, which confirms the appropriateness for development of Elmbrook House and its site for residential development. I do however consider this site could be delivered earlier in the Plan, ie within the 1-5 Year timeline (2023-2027 ), rather than later in the Plan period. This site is deliverable, achievable and will be available within 1-5 Years: for this reason the allocation for the site can come forward in Years 1-5 (2023-2027), rather than years 6-10 (2028-2032). With the exception of this, relating to the appropriateness of the delivery of development, I consider that this allocation is 'positively prepared' to meet the objectively assessed needs of the Plan and will therefore help achieve Plan objectives and sustainable development. I also consider that the allocation is 'effective' in being deliverable / delivering sustainable development over the plan period. Finally, as a predominantly brownfield site, I consider that redevelopment</p>	

for residential is 'consistent with notional policy'. The Local Plan should enable the delivery of sustainable development and this site is within a residential area and immediately adjacent to Sunbury Railway station, bus routes and within walking distance of Sunbury town centre.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

I consider that this site can be brought forward within the L-5 Year timeline (2023-2027) rather than 1-6 Year timeline (2028-2032).

I therefore request this allocation be moved forward into the 1-5 Year timeline (2023-2027), rather than 1-6 Year timeline (2028-2032).

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Helen Harvey (42220321)</b>	
<b>Organisation:</b>	
<b>Response ID: 1120665</b>	
<b>Policy / Evidence Base / Part of Plan: ST4/010 (Riverside car park, Thames Street, Staines)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>Spelthorne Borough Council has a target from the government to build 618 homes per year for the next 15 years. The Council's housing register has also risen from 1942 households to approximately 3,300 in the last 2 years, representing a serious housing crisis that the council must address. It is important for the Council to deliver more high-quality housing to let at affordable rents to local people. Spelthorne Borough Council Assets Team are working to achieve delivering this local housing across a number of strategic sites in the Borough. I support the provisions of Allocation 5T4/0L0, which confirms the appropriateness for development of The Riverside Car Park site for mixed use residential development with ground floor mixed Class E Commercial/Caf6 and linkage to Memorial Gardens, subject to the below comments on density and timescales for delivery of any development. In respect of density, I consider any development can greatly exceed the suggested 35 units proposed in ST4/010. It is considered that proposals could achieve up to 150 units on site, subject to any restriction from the Heathrow Safeguarding Zone. I also consider this site could be delivered earlier in the Plan, ie within the 1-5 Year timeline (2023- 2027), rather than the 6-10 Year timeline (2028-2032). This site is immediately deliverable, achievable and will be available within 1-5 Years (2023-2027):for this reason the allocation for the site can come forward in Years 1-5 , rather than years 6-10. With the exception of this, relating to the appropriateness of the years of delivery of development, I consider that this allocation is 'positively prepared' to meet the objectively assessed</p>	



needs of the Plan. The allocation will therefore help achieve Plan objectives and sustainable development. I also consider that the allocation is 'effective' in being deliverable / delivering sustainable development over the plan period. However, I consider that the density of the site can reasonably be increased to 150 units, subject to any limitation of the Heathrow safeguarding zone. Finally, as a predominantly brownfield site, I consider that redevelopment for residential is 'consistent with national policy'- the Local Plan should enable the delivery of sustainable development given this site is within Staines Town Centre, with excellent access to town centre shops and services, and within close proximity to the Bus Station and within walking distance of Staines Railway station.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

I consider that the site can achieve up to 150 units, subject to any limitation of the Heathrow safeguarding zone, and that development be brought forward within the 1-5 Year timeline (2023-2027) rather than 1-6 Year timeline (2028-2032).

I therefore request this allocation is amended to reflect a higher density, with a suggestion that this is increased to 1-50 units and that the site is moved forward into the 1-5 Year timeline (2023-2027) rather than 1-6 Year timeline (2028-2032).

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Helen Harvey (42220321)</b>
<b>Organisation:</b>

<b>Response ID: 1120663</b>
<b>Policy / Evidence Base / Part of Plan: ST4/009 (Elmsleigh Centre and Adjoining Land, South Street)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Spelthorne Borough Council has a target from the government to build 618 homes per year for the next 15 years. The Council’s housing register has also risen from 1,942 households to approximately 3,300 in the last 2 years, representing a serious housing crisis that the council must address. It is important for the Council to deliver more high-quality housing to let at affordable rents to local people. Spelthorne Borough Council Assets Team are working to achieve delivering this local housing across a number of strategic sites in the Borough, including within Staines town centre. I support the provisions of Allocation ST4/009, which confirms the appropriateness of the Elmsleigh Centre for future mixed use, residential led development, for approximately 850 units alongside flexible Class E retail/ commercial development. I consider however that parts of this site, such as the disused Tothill Car Park, can come forward for development sooner than the suggested 11-15 Year timeline (2033-2037). Indeed, the Council, as owners of the Elmsleigh Centre should, consider a phased scheme appropriate for redevelopment, with elements of the Elmsleigh, such as the Tothill Car Park, coming forward within the 1-5 year (2023-2027), with other proposals having potential for the 6-10 Year timeline (2028-2032) and wider wholesale redevelopment finally in the 11-15 Year timeline (2033-2037). Aside from the opportunity to realise urban regeneration within the heart of the town centre being realised sooner, as I suggest in this representation, I consider this allocation is ‘positively prepared’ to meet the

objectively assessed needs of the Plan and will therefore help achieve Plan objectives and sustainable development. I also consider that the allocation is 'effective' in being deliverable / delivering sustainable development over the plan period. Finally, as a predominantly brownfield site in a sustainable town centre location, I consider part redevelopment of the Elmsleigh Centre in a phased manner for residential is 'consistent with national policy'. This site, being both within the town centre, with its ease of access to services and facilities, and immediately opposite Staines Bus Station / within a highly accessible location will help achieve sustainable development and renaissance within the town centre.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

I consider that the policy should outline that the redevelopment of the Elmsleigh Centre should be phased, with the Tothill Car Park and adjacent parts of the centre being delivered in 1-5 Years (2023-2027), with further opportunities likely to become available within 6-10 Years (2028-2032).

With wider wholesale redevelopment beyond this, in 11-15 Years (2033-2037)

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Cllr Ian Harvey (19531457)</b>
<b>Organisation: Spelthorne BC Councillor</b>

<b>Response ID: 1124632</b>
<b>Policy / Evidence Base / Part of Plan: Policy PS1: Responding to the climate emergency</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
KEMPTON PARK Green Belt I write with regard to the above and request that Spelthorne Borough Council continues to categorise it Kempton Park, including the entire perimeter, and including areas not currently used for horse racing, as Strongly Performing Green Belt and protect it from any development, in full or part on the site. I have lived in Lower Sunbury for over 25 years and greatly value the benefits of this open space, and am well known for opposing its development. It performs a crucial role is separating developed areas of Spelthorne, in particular Sunbury and Ashford, from the contiguous conurbation of Greater London. Without it we would simple become part of the great "urban sprawl" that would stretch all the way east to Tilbury / Dartford, and lose our identity. This role of separating communities to stop them merging is a fundamental Green Belt function. It also forms a crucial role with regard to the

environment, as a habitat as well as helping ameliorate atmospheric pollution, acting as a 'green lung' for the community; the adjacent Sunbury Cross is a well known pollution "hot spot".

I am aware that Surrey County Council object to development here, chiefly on Highways grounds (understandably) and I am also very concerned about the impact of potentially many thousands of extra car movements each day on Sunbury Cross and adjacent roads, which are already "grid locked" at rush hour,

Adjacent Sunbury Cross already has the tallest blocks and highest density of residential accommodation in the Borough and is already more than "doing its bit".

Development should be concentrated on "brown field" sites in particular in existing residential areas such as Staines and Ashford, where there are still numerous sites that are not fully exploited. A crossBorough resident consultation in late 2018 showed that a significant majority of residents were in favour of development being concentrated on brown field sites, primarily in current residential areas, with sites being redeveloped if necessary, to enhance density and maximise the sites' potential, rather than sacrificing Green Belt.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Cllr Ian Harvey (19531457)</b>	
<b>Organisation: Spelthorne BC Councillor</b>	
<b>Response ID: 1119417</b>	
<b>Policy / Evidence Base / Part of Plan: Policy E5: Open Space and Recreation</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Please find attached submissions for the following: Bramwell Close and Lime Close; both in Sunbury East Ward. to be included in consideration for protections as Local Green Spaces within Spelthorne. I also strongly urge that the entire Kempton Park race course and adjacent allied land be retained as Green Space and not considered for development in full or part. I believe that development within Spelthorne should be concentrated in existing non Green Belt / Green Space areas, in accordance with SP1.	
<b>Question 6: You can upload any modifications below.</b>	
LGS LSun Lime Crescent 2209c.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589101/PDF/-/LGS%20LSun%20Lime%20Crescent%202209c%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589101/PDF/-/LGS%20LSun%20Lime%20Crescent%202209c%2Epdf</a>	

LGS LSun Bramwell Close 2209c.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589102/PDF/-/LGS%20LSun%20Bramwell%20Close%202209c%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Jeanne Heffernan (41984385)</b>
<b>Organisation:</b>

<b>Response ID: 1117174</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Local Green Space: Ashford Town: Village Way We whole-heartedly support the designation as a Local Green Place to Village Way, Ashford. We currently use - and have always used - the recreation ground since 1959. We used it as children, as did our child, not to mention our dog! It proved to be a vital lifeline for us during the lockdowns: the benefit to our health and mental well-being cannot be understated; it will doubtlessly prove to be so again during any future lock-downs, and as we progress into out later years. I have rarely passed the recreation ground without seeing the children’s playground, and tennis courts/basketball areas being used. Development of this area would be vastly and negatively impacted by developing it, not to mention the current over-stretching of our doctors’ surgeries, dentist, schools (some classes in this part of Surrey already exceed the 30-child limit due to current shortfall in the availability of school places).



May sense prevail in this situation. There are brown-fill sites that could be utilised instead.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Helen Heslop (19802881)</b>	
<b>Organisation:</b>	
<b>Response ID: 1125642</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: I think the draft Local Plan is sound, particularly I applaud the exclusion of Kempton Park as a potential site for development. Any such development would increase traffic on the already overloaded A308 Staines Road East, especially at the choke points
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: Yes it is sound
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: Yes it complies with the Duty to co-operate
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No Response	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Emma Higgins (41984481)</b>	
Organisation:	
<b>Response ID: 1117176</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
LGS ASHFORD TOWN : BROOKLANDS SITE I use the land opposite for walks, exercise, and general recreation use. One of the main reasons I moved to this flat was because of how quiet and peaceful it is here. Having potential housing put there would impact that quietness massively! It would also affect lighting coming to the flat and my privacy.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr John Hitchinson (40923617)</b>
<b>Organisation:</b>

<b>Response ID: 1123632</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
At the recent ANRA meeting, residents were made aware of the proposal for new housing in the Staines and Ashford area. Looking at the proposed 650 new dwellings making approx two persons per property adding 1300 persons needing Doctors, Dentists,Hospital and other NHS services. This is almost impossible even with the average death rate in the area. Apparently the additional housing is over a ten year plan adding up to a further 6500 residents with obvious new additions. The plan is to build on many local spaces , knocking down the multi storey car park ,taking the youth centre in Kennelworth Road Ashford which is successfully run for all ages and of course building on the areas green belt.

This to any normal person is impossible and of course ruining the lives of long standing local residents. Ashford town shops and lack of parking is just another reason to call this mad idea off.  
Enter Staines from the A30 roundabout there are still empty office buildings as are along the Causeway which can be converted and all near to all local amenities.  
Please DO NOT wreck the lives of Ashford residents

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Brian Hobday (25740257)</b>	
<b>Organisation:</b>	
<b>Response ID: 1125749</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: It doesn't seem to be very democratic because it does not follow the wishes of the majority of residents in Spelthorne who elect their politicians. It seems to be driven by building hundreds of flats in Staines in order to increase the amount of council t
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: It is not sound and is politically biased and does not reflect the views of local residents. The majority of residents do not want Staines to be transformed by high rise developments. It is the blatant over development which will be ruin Staines & devalue
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: It has not complied with the wishes of the majority of Spelthorne residents. We do not want high rise developments in Staines.
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
It is politically biased and not relevant. The proposed high rise developments in Staines do not adequately take into consideration the environment & future climate change requirements.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
I would like to see Staines town developed in a much more sensitive way. This means councillors listening to their local residents views instead of trying to convert the town into "Flatsville on Thames".	



**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No.

<b>Respondent: Mr David Holmes (41229153)</b>	
<b>Organisation:</b>	
<b>Response ID: 1111824</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Local Green Space : Sunbury Common : Catherine Drive I would like to voice my opinion against any future development of new residential property on the green space at the end of Catherine Drive, Sunbury. This space was a help to me when I was unwell and could not walk far, especially also during the various lock downs when I needed to get out of the house for a short walk. I live in Howard Close (off Catherine Drive), and if it were to be developed, and I became unwell again, that would not give me a local green space to safely walk around.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Carl Homerstone (41138977)</b>	
<b>Organisation:</b>	
<b>Response ID: 1111849</b>	
<b>Policy / Evidence Base / Part of Plan: Policy SP7: Heathrow Airport</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<b>Multiple reasons for why the plan is not sound were selected</b> - Not Positively Prepared, Not Justified, Not Effective, Not Consistent with National Policy Together with Draft Policy EC1, Draft Policy SP7 fails to assess properly the needs of economic development and best use of land around and in the vicinity of Heathrow Airport. This requires a full and detailed assessment of all land available to the south of the Airport, including land east of Long Lane. This should be set against national interest, up-to-date local, regional and national needs and taking into account to either justify removal from Green Belt or accepting over-riding very special circumstances. Please cross-refer to plans and supporting statement to assist in showing what is deemed achievable.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Land to the east of Long Lane should either be removed from Green Belt or, under very special circumstances, allocated for economic development.	
<b>Question 6: You can upload any modifications below.</b>	

Spelthorne R19 Stanwell Proposed Site Plan.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/563519/PDF/-/Spelthorne%20R19%20Stanwell%20Proposed%20Site%20Plan%2Epdf>

Spelthorne R19 Stanwell Existing Site Plan.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/563520/PDF/-/Spelthorne%20R19%20Stanwell%20Existing%20Site%20Plan%2Epdf>

Spelthorne R19 Stanwell Option C.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/563521/PDF/-/Spelthorne%20R19%20Stanwell%20Option%20C%2Epdf>

Spelthorne R19 Stanwell Option A.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/563522/PDF/-/Spelthorne%20R19%20Stanwell%20Option%20A%2Epdf>

Spelthorne R19 Stanwell Option B.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/563523/PDF/-/Spelthorne%20R19%20Stanwell%20Option%20B%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: It is important to allow questioning and discussion on why land to the east of Long Lane has been retained in Green Belt and very special circumstances disregard in spite of overwhelming evidence demonstrating local, regional and national need for economic development within the area.

<b>Respondent: Mr Carl Homerstone (41138977)</b>	
<b>Organisation:</b>	
<b>Response ID: 1111847</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy EC1: Meeting Employment Needs	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<b>Multiple reasons for why the plan is not sound were selected</b> - Not Positively Prepared, Not Justified, Not Effective, Not Consistent with National Policy Together with Draft Policy SP7, Draft Policy ED1 fails to assess properly the needs of economic development and best use of land around and in the vicinity of Heathrow Airport. This requires a full and detailed assessment of all land available to the south of the Airport, including land east of Long Lane. This should be set against national interest, up-to-date local, regional and national needs and taking into account to either justify removal from Green Belt or accepting over-riding very special circumstances. Please cross-refer to plans and supporting statement to assist in showing what is deemed achievable.	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Land to the east of Long Lane should either be removed from Green Belt or, under very special circumstances, allocated for economic development	

**Question 6:** You can upload any modifications below.

Spelthorne R19 Stanwell Proposed Site Plan.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/563513/PDF/-/Spelthorne%20R19%20Stanwell%20Proposed%20Site%20Plan%2Epdf>

Spelthorne R19 Stanwell Existing Site Plan.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/563514/PDF/-/Spelthorne%20R19%20Stanwell%20Existing%20Site%20Plan%2Epdf>

Spelthorne R19 Stanwell Option C.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/563515/PDF/-/Spelthorne%20R19%20Stanwell%20Option%20C%2Epdf>

Spelthorne R19 Stanwell Option A.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/563516/PDF/-/Spelthorne%20R19%20Stanwell%20Option%20A%2Epdf>

Spelthorne R19 Stanwell Option B.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/563517/PDF/-/Spelthorne%20R19%20Stanwell%20Option%20B%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: It is important to allow questioning and discussion on why land to the east of Long Lane has been retained in Green Belt and very special circumstances disregard in spite of overwhelming evidence demonstrating local, regional and national need for economic development within the area.

<b>Respondent: Mrs Karen Howkins (25809089)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117366</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Please find the attached detailed submissions for Local Green Space, the submission contains location map, photo, reason and contact details. This location is critical to be protected, and is highly valued by local residents. I would also like to take the opportunity to thank you for all your hard work on the local plan, this is appreciated by the residents of Spelthorne.	
<b>Question 6:</b> You can upload any modifications below.	
LGS LSG Rowlands 2208c.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/585510/PDF/-/LGS%20LSG%20Rowlands%202208c%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/585510/PDF/-/LGS%20LSG%20Rowlands%202208c%2Epdf</a>	
LGS LSG Lincoln 2208c.pdf	



<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/585524/PDF/-/LGS%20LSG%20Lincoln%202208c%2Epdf>

CV - Green Spaces - 20 Sept 22.docx

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/585525/DOCX/-/CV%20%2D%20Green%20Spaces%20%2D%2020%20Sept%2022%2Edocx>

LGS - SunC - Skate Park TW16 IB-08.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/585526/PDF/-/LGS%20%2D%20SunC%20%2D%20Skate%20Park%20TW16%20IB%2D08%2Epdf>

LGS LSG Ashdene CI 2208c.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/585527/PDF/-/LGS%20LSG%20Ashdene%20CI%202208c%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Lin Hudson (41425761)</b>
<b>Organisation:</b>

<b>Response ID: 1124074</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
RUNNING HORSE GREEN BELT. GROVELEY ROAD SUNBURY It is our understanding that the above green belt area is up for development. We would like to express our concerns over this proposal and would like the planning committee to consider the following. 1). Area Facilities; the local residents of Sunbury Common do not have access to a local GP surgery this side of Sunbury Cross therefore are usually registered with either Sunbury Heath Centre or Upper Halliford Doctors Surgery. Both of these surgeries are well over capacity at present and patients are unable to obtain appointments or even contact the surgery by telephone. Also our nearest A&E department, being St. Peter's (our local hospital) is working at over capacity. 2). Infrastructure; During peak times of the day traffic is frequently grid locked trying to access Sunbury Cross which heightens air and noise pollution.

3). Erosion of Green Space Areas; by the construction of the proposed housing development this will reduce our dwindling green space further within Sunbury Common area.

Therefore for the above reasons we object to a major development on the above site.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Lin Hudson (41425761)</b>
<b>Organisation:</b>

<b>Response ID: 1111818</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
LGS Sunbury Common : Heatherlands. We have reason to believe the LGS in Heatherlands may be considered for speculative development. We would like to express our concerns and strong disapproval over this proposal. Please consider the following: 1) MENTAL HEALTH. Many of our residents now work from home or are retired, therefore the importance of a green space and trees are imperative for our well being. Mental health issues are on the increase in the UK and by building on the small piece of land will have negative affects on so many levels. 2) SECURITY.

The majority if not all of our homes in Heatherlands have kitchens to the front of the house. This enables residents to see and access each others properties if need be. This is a big advance for security reasons. Especially for the elderly living in our road. By building on our green will prevent us being able to do this.

3) COMMUNITY.

Most Heatherland residents do not have large gardens to the rear of their properties therefore our green space is essential for families with young children to have a safe area for them to play, supervised and close to home, the space has also been used on various occasions for community gatherings - Queens Jubilee etc. We need this green space to keep our community alive.

4) AESTHETIC.

Building on our small green space will compromise the layout of the road for which it was originally designed. By adding a new build it would not integrated with the existing building style as all properties were built at the same time (1960s).

5) PARKING.

Parking is always an issue. Most evenings and weekends it is difficult to find a parking space near our home. Many residents from nearby Vicarage road already use Heatherlands to park as many of their homes have little or no parking. During the day invariably the road is used by builder/shop worker/maintenance people who can't park on Vicarage road. By building on our piece of green space will obviously increase the demand for parking on an already overloaded road. We have on occasions been concerned about emergency services being able to access the road due to too many vehicles parking in a narrow road.

6). OWNERSHIP.

Who owns the aforementioned land?

7) INFRASTRUCTURE.

Should additional properties be considered, the existing sewage/drainage linking to the main system on Vicarage Road will have to be completely upgraded as at present the system frequently causes problems due to the overcapacity.

For all of the above mentioned reasons we believe that by building on our small green space is completely inappropriate.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Mark Huggins (33615297)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117177</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
I would like it to be known as a resident of Queens Walk Ashford I am very much in favour of the land behind my house being changed from small local amenity space to Local Green Space (LGS). My reasons are as follows: It's very nice clear green open space for residents to use for 1) children to have somewhere safe to play outdoors. 2)Recreation in general. 3)Dog walking. 4)Where neighbours can hold parties/celebrations of national importance such as jubilee parties etc.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Peter Hughes (19690497)</b>
<b>Organisation:</b>

<b>Response ID: 1124608</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
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<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
With our MP now Chancellor, perhaps our borough can escape the demand for new housing? At all events I hereby protest at the loss of any Green Belt in Spelthorne.
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response



If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr and Mrs W.R Hull (42037409)</b>
<b>Organisation:</b>

<b>Response ID: 1118058</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
<p>We are writing to place our objections to the present Council’s Local Green Spaces review.</p> <p>We welcome the Council’s accepted sites for LGS designation in it’s ‘Local Green Space Review of submitted spaces’ of January 2022</p> <p>We have grave concerns at the council’s rejection of 41 sites including school playing fields, private sports grounds, allotments, Green Belt areas and other PUOS sites.</p> <p>We call on the Council to protect local as Local Green Spaces all remaining protected urban open spaces (PUOS) that are still in existence and have not as yet been built on (nor are currently being built on) including school playing fields, private sports grounds, allotments, the Staines Reservoir Aqueduct, Stanwell Quarry, Duncroft, Wraysbury Road in Staines, the Grounds of Sunbury Court and Spelthorne Grove in Ashford.</p>

We call on the Council to protect the 19 Green Belt areas and other rejected sites that were proposed by residents as Local Green Spaces due to their particular importance to the local community  
Our particular grievance is with the destruction of school playing fields and private playing fields when the governments of all persuasions constantly say how unhealthy we as a nation are becoming and then give the green light to destroy everyone's but particularly the young's means of healthy activity

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Tarun Hundalani (42239329)</b>
<b>Organisation: Hund'lani &amp; Company</b>

<b>Response ID: 1128190</b>	
<b>Policy / Evidence Base / Part of Plan: Duty to Cooperate</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Not Positively, Prepared Not Justified, Not Effective, Not Consistent with National Policy	Additional Comments: No Not Positively, Prepared Not Justified, Not Effective, Not Consistent with National Policy
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Not Positively, Prepared Not Justified, Not Effective, Not Consistent with National Policy
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Not Positively, Prepared Not Justified, Not Effective, Not Consistent with National Policy	Additional Comments: No Not Positively, Prepared Not Justified, Not Effective, Not Consistent with National Policy
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Duty to Cooperate:	

The NPPF (paragraphs 24 to 27) confirms that the Duty to Co-operate ('DtC') continues to be a basic procedural requirement of plan making. In particular, paragraph 26 details that this joint working should determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.

The purpose of the DtC is to ensure strategic priorities are properly co-ordinated and clearly reflected in Local Plans. The failure to demonstrate compliance with the DtC would render the Local Plan incapable of being found to be legally compliant. We support, therefore, the principle of the Council working with neighbouring authorities to address strategic issues and emphasise the need to continue this process throughout the Plan-making process. However, it is concerning that the Council is "only in the process of preparing statement of common ground outlining its cooperation with strategic bodies" (Duty to Cooperate (May 2022) – Para 2.14). We suggest that given the stage (Regulation 19), the Local Plan should be based on already agreed positions on all strategic matters with all relevant parties. The Council will need to work proactively with its neighbouring authorities to ensure the needs are met.

There are also major infrastructure projects that should, whilst temporarily on hold, for instance the planned expansion of a third runway for Heathrow Airport, be taken into account given the importance of the National Significant Infrastructure Project ('NSIP'). The anticipated benefits for the South East from the Heathrow expansion include up to £30bn in economic benefits and the creation of 33,200 new jobs. Given the immediate proximity of the Borough to Heathrow, it is perfectly placed to provide complementary development (both housing and economic) to the NSIP.

Suggested modifications:

Employment Land Needs Assessment & Green Belt Review

The Council's Employment Land Needs Assessment (ELNA) (2022) forms part of the evidence base for the emerging Local Plan and sets out that over the plan period over 18,000 sqm of E(g)(i) and E(g)(ii) Office and Research & Development will be required, together with ~12,000 sqm of B8 Warehousing and Storage. This is a slight reduction from the Council's previously published ELNA (2018), which supported the Preferred Options consultation in 2020. The ELNA (2022) states that due to the locations and nature of the floorspace, it is unlikely that even with the reduced need for B2 use (expected to reduce in requirement by ~11,000 sqm) and associated release of that land for redevelopment, the identified need for other employment uses is unlikely to be met on those former B2 industrial sites.

Notwithstanding this, the Council has determined that the identified need for this employment floorspace can instead be met on brownfield sites and through intensification of existing ones, rather than through the release of Green Belt land. The Council states that it is the view of officers and Members that the need for employment floorspace without the proposed expansion of Heathrow Airport, together with relatively low level of need for employment floorspace identified in the ELNA (2022), the need can instead be met through re-use or intensification on existing sites, such that the need is not so great as to outweigh the harm caused by release of Green Belt sites for employment floorspace. The Council states that the collective view, in consultation with local residents, was that the more pressing need is for housing and that the community would prefer to see sites released for residential development over an employment use. The Council concludes that "This position can be revisited at the 5-year review stage of the Local Plan from adoption to take account of the status of the expansion plans at that time and the sites available to meet need".

As such, and as required by Paragraph 140 of the NPPF, the Council has concluded that Exceptional Circumstances do not exist, as required, to justify the alteration of the existing Green Belt boundaries to cater for this need. Consequently, the Council no longer proposes any Site Allocations and associated Green Belt release to deliver the required floorspace. This is a change of position from the Council's Preferred Options stage, where it had previously considered Exceptional Circumstances did exist, and proposed to release two sites in close proximity to those of Hund'ani & Company. Those sites are SN1/005 (Land at Northumberland Close, Stanwell) and SN1/006 (Land to west of Long Lane and south of Blackburn Trading Estate). We note that both sites are still proposed for release from the Green Belt, but on the basis that they could support residential development instead of employment uses. We do not agree with the Council's conclusion and consider that Exceptional Circumstances do exist to allow the release of Green Belt land to meet emerging need for employment floorspace. The NPPF advises that LPAs should "where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period" (paragraph 143©) and that as part of any review "be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period" (paragraph 143(e)) and "define boundaries clearly, using physical features that are readily recognisable and likely to be permanent" (paragraph 143(f)). Although temporarily on hold, Heathrow Airport will continue to expand and additional land will be required to provide all of the infrastructure and services necessary to deliver this. The brownfield sites and intensification of existing sites will not alone be able to cater for this need. This was evidenced by the land previously identified by HAL as forming part of the obvious and logical masterplanning of the airport's growth. Therefore, future additional land will be required to support its growth and sites should be allocated now so that they can either be developed now or in the future once the expansion plans for Heathrow Airport resume. As such, Exceptional Circumstances do exist and the Council should propose the release of some weakly performing Green Belt land to meet the need, which would not adversely affect the integrity of the strategic Green Belt. Without this, we consider that the Local Plan will be unable to meet the stated identified need for E(g)(i), E(g)(ii) and B8 uses set out in the ELNA, which will only be exacerbated when Heathrow continues its plans for expansion, such that the Local Plan can be capable of being found sound at EiP.

With this in mind, Hund'ani & Company's sites at SN1/007a and SN1/014 are the most appropriate to meet this need, being available, developable and suitable, and should be proposed to be removed from the Green Belt and included as Site Allocations in the Local Plan. Both sites were assessed initially at Stage 1 of the Council's Green Belt Assessment, as part of the Local Area 6 and the Council's conclusion, when considered against the purposes of the Green Belt (as set out now in paragraphs 138 and 139 of the NPPF), was that the Local Area was "strongly performing". At Stage 2 of the Green Belt Assessment, which provided a finer grain assessment, the sites were considered as part of the wider subarea 6-d, which covered an area of 12 hectares. The Council's conclusion again was that the Green Belt sub-area was "strongly performing". However, we outlined in our letter of 21<sup>st</sup> January 2020 that we considered that the Council's approach was still too broad brush and meant that it had omitted two self-contained sites (SN1/007a and SN1/014) which should have been assessed independently as their own independent sub-areas. We provided an assessment of those sites in our letter of 21<sup>st</sup> January 2020 demonstrating that when considered individually and on their own merits, they perform weakly and should instead be recommended for release from the Green Belt. The Council has subsequently assessed these sites on an individual basis, concluding in each case that the sites are not considered appropriate for allocation and release for the Green Belt due to their performance against Green Belt purposes. The Council's assessment

states that the sites should be discounted from consideration but reviewed at the five year review stage in the context of potential wider economic needs. We do not agree with the Council's assessment, for the reasons set out further below, and consider that both sites comprise weakly performing Green Belt (our assessment of both sites is found further below), with qualities more similar to brownfield and previously developed land. Both sites should be given a Site Allocation which would assist with meeting the identified need in the ELNA (2022).

Additionally, we note that the Council has assessed the Green Belt land subject to proposed Site Allocation SN1/005 (Land at Northumberland Close) as weakly performing. That parcel of land shares the same characteristics as Hund'lani & Company's site at Greenacre Farm (SN1/007a), being surrounded by development on three sides, and with a frontage onto Bedfont Road to the north, but with SN1/005 being simply a narrower strip of land. We consider, therefore, the Council's assessment of the site at SN1/007a to be at odds with that of at SN1/005 and therefore incorrect, and that it should instead be assessed as 'weakly performing' Green Belt.

Alternatively, if the sites at SN1/007a and SN1/014 cannot be given a Site Allocation for development now, the sites should be safeguarded for future development in line with Paragraph 143© of the NPPF, assisting with meeting "longer-term development needs stretching beyond the plan period" (NPPF Paragraph 143c ). Green Belt boundaries would therefore not need to be reviewed again in the future (Paragraph 143e ) and both sites can be defined by clear boundaries, with "physical features that are readily recognisable and likely to be permanent" (Paragraph 143f). With these amendments to the Green Belt boundaries, we consider that the Local Plan can be capable of being found sound at EIP.

Please see attached document for full rep.

**Question 6:** You can upload any modifications below.

Hundlani \_ Company - Reg 19 Letter of Representations \_ Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618812/PDF/->

[/Hundlani%20%5F%20Company%20%2D%20Reg%2019%20Letter%20of%20Representations%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618812/PDF/-/Hundlani%20%5F%20Company%20%2D%20Reg%2019%20Letter%20of%20Representations%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Yes, I wish to participate in hearing session(s). To confirm that Exceptional Circumstances exist to justify the release of Green Belt land for employment use, that the Council's Green Belt assessment of sites SN1/007a and SN1/014 is incorrect, and that both sites should be released from the Green Belt and given a site allocation for future development.

<b>Respondent: Tarun Hundalani (42239329)</b>
<b>Organisation: Hund'lani &amp; Company</b>

<b>Response ID: 1128188</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: Not Positively, Prepared Not Justified, Not Effective, Not Consistent with National Policy
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: Not Positively, Prepared Not Justified, Not Effective, Not Consistent with National Policy
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No	Additional Comments: Not Positively, Prepared Not Justified, Not Effective, Not Consistent with National Policy
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Local Plan Period	
Whilst we support the decision of the Council to extend the Local Plan from 2035 to 2037, given protracted examinations for Local Planning Authorities that are faced with similar constraints (the Green Belt) in areas like Tandridge and Welwyn Hatfield, with a start date of 2022 we consider it unlikely that the Local Plan will be submitted, examined, and adopted over the next 12 months, with an adoption date more likely to be 2024 or indeed 2025.	
SUGGESTED MODIFICATIONS:	



Local Plan Period: With the NPPF (paragraph 21) requiring that strategic policies “should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure”, we suggest the end date for the Local Plan is extended to allow for a protracted examination and to ensure the Local Plan is in accordance with the NPPF. Furthermore, with major infrastructure projects like Heathrow still on the horizon, to ensure the Local Plan is positively prepared, it is vital that an end of date of at least 2039/2040 is used.

We would reiterate that Hund’lani & Company welcomes the decision to bring forward a new Local Plan as the importance of creating a Plan-led approach to planning for development cannot be understated. As the Council’s adopted Local Plan pre-dates the National Planning Policy Framework (NPPF), a new Local Plan is required to ensure the future needs of residents and businesses in the Borough can be met through the sustainable development of sites. However, it is the Council’s determination that Exceptional Circumstances no longer exist to justify the release of Green Belt land for employment purposes and the associated omission of sustainably located sites for employment led uses which we consider results in the spatial strategy of the Local Plan being flawed. Two of the sites which we consider have been omitted from allocation are Greenacre Farm, Bedfont Road, Stanwell (identified by the Council as site reference SN1/007a) and Mentone Farm, Bedfont Road, Stanwell (identified by the Council as site reference SN1/014), both on land located south of Heathrow Airport’s southern perimeter road, and both owned/occupied by Hund’lani & Company.

Policy SP4 seeks to prevent inappropriate development within the Green Belt. Whilst we agree with the principle of the Policy, we do not agree with the proposed amendments to the Green Belt Boundary. We consider that it is the Council’s determination that Exceptional Circumstances no longer exist to justify the release of Green Belt land for employment purposes and the associated omission of sustainably located sites for employment led uses which results in the spatial strategy of the Local Plan being flawed. One of the sites which we consider has been omitted from allocation is Greenacre Farm, Bedfont Road, Stanwell (identified by the Council as site reference SN1/007a).

Additionally, we consider that Discounted Site Allocation reference SN1/007a has been assessed incorrectly as ‘weakly performing’ Green Belt. Our Green Belt Assessment (summarised below and included at Appendix 1 of our accompanying Cover Letter) demonstrates that the site does not perform the purposes for which land is included in the Green Belt and as such, release of the site should be supported. We therefore consider the approach taken to the proposed amendments to the Green Belt is not consistent with national policy, is not therefore justified and as a consequence, this Policy is unsound. Please see Carter Jonas’ Cover Letter for further detail.

Suggested modifications:

The Green Belt boundary should be amended on the Policies Map to reflect the removal of site SN1/007a from the Green Belt. No change would be required to the wording of Policy SP4: Green Belt given that it states the ‘Green Belt boundary is defined on the Policies Map’.

SN1/007a Development Potential

This site has direct access onto Bedfont Road to the north and is in close proximity to the Strategic Road Network including the Southern Perimeter Road to the north, M25 and M4 motorways to the west, such that we consider it has potential for a number of uses, inter alia, commercial, office (Use Class E(g)), general industry (Use Class B2) and/or storage or distribution (Use Class B8).

Indeed, more widely and along Bedfont Road from Beacon Roundabout to Northumberland Close, there exists industrial and commercial uses fronting Bedfont Road. This includes Dnata, the longstanding Esso West Terminal, Scania, JAS Forwarding and Virgin Atlantic Cargo. The introduction of similar uses on this site, together with its proximity to Heathrow Airport, would therefore be entirely appropriate.

As the site is surrounded by existing development on two sides and Bedfont Road to the north (beyond which is Heathrow Airport), and constitutes poor quality land, any development on it would be seen in the context of surrounding development and would improve the existing situation. Prohibiting the site from coming forward for development would be incongruous with the existing form of development along this road, and indeed in the wider locality. The development of the site would make best use of the land, efficient use of existing services and infrastructure, and would provide a significant contribution to meeting the Borough's future employment needs.

Review of Officer's Site Assessment of Discounted Alternative Allocation Site SN1/007a (Greenacre Farm)

Site reference SN1/007a (Greenacre Farm) has an area of 1.95 hectares contains the former bungalow of No. 103 Greenacre Farm and a large shed to the rear (in the south west corner of the site). Entry to the site is from the north west, where there exists a vehicular crossover from Bedfont Road into the site. The site has been used in the past and that almost a quarter of it was used in connection with activities at the farm. The remainder of the site has previously been used for several uses, including gravel extraction and lights in connection with the use of a former runway at Heathrow Airport, prior to the construction of Terminal 4. The condition of the site reflects its varied past and it exists in an extremely poor state, reflecting the associated impact caused by the uncertainty around Heathrow Airport's expansion.

The site as it exists now is enclosed by built form on two sides, with commercial uses to the west, on the corner of Bedfont Road and Long Lane, and commercial uses to the east on Crane Road. The commercial use on Long Lane also extends in part around and along the southern boundary. To the north, the site fronts Bedfont Road, a 'permanent man-made feature' as described by Table 3.1 of the Council's Stage 2 Green Belt Assessment Review of the wider Sub-Area 6-d. To the south there exists an established and unbroken hedgerow and tree line, identified as one of the 'additional boundary features', together with fencing, separating it from land to the south. The site is therefore self-contained site and has now correctly been assessed by the Council as its own sub-area (SN1/007a).

Please see attached document for full rep.

**Question 6:** You can upload any modifications below.

Hundlani \_ Company - Reg 19 Letter of Representations\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618813/PDF/-/Hundlani%20%5F%20Company%20%2D%20Reg%2019%20Letter%20of%20Representations%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Yes, I wish to participate in hearing session(s). To confirm that Exceptional Circumstances exist to justify the release of Green Belt land for employment use, that the Council's Green Belt assessment of sites SN1/007a and SN1/014 is incorrect, and that both sites should be released from the Green Belt and given a site allocation for future development.

<b>Respondent: Tarun Hundalani (42239329)</b>
<b>Organisation: Hund'lani &amp; Company</b>

<b>Response ID: 1128192</b>
<b>Policy / Evidence Base / Part of Plan: Policy PS1: Responding to the climate emergency</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not Positively Prepared, Not Justified, Not Effective, Not Consistent with National Policy - were also selected Policy SP4 seeks to prevent inappropriate development within the Green Belt. Whilst we agree with the principle of the Policy, we do not agree with the proposed amendments to the Green Belt Boundary. We consider that it is the Council's determination that Exceptional Circumstances no longer exist to justify the release of Green Belt land for employment purposes and the associated omission of sustainably located sites for employment led uses which results in the spatial strategy of the Local Plan being flawed. One of the sites which we consider has been omitted from allocation is Mentone Farm, Bedfont Road, Stanwell (identified by the Council as site reference SN1/014). Additionally, we consider that Discounted Site Allocation reference SN1/014 has been assessed incorrectly as 'weakly performing' Green Belt. Our Green Belt Assessment (summarised below and included at Appendix 1 of our accompanying Cover Letter) demonstrates that the site does not perform the purposes for which land is included in the Green Belt and as such, release of the site should be supported. We therefore consider the approach taken to the proposed amendments to the Green Belt is not consistent with national policy, is not therefore justified and as a consequence, this Policy is unsound. Please see attached document for full response (large document).

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

The Green Belt boundary should be amended on the Policies Map to reflect the removal of site SN1/014 from the Green Belt. No change would be required to the wording of Policy SP4: Green Belt given that it states the 'Green Belt boundary is defined on the Policies Map'.

Employment Land Needs Assessment & Green Belt Review

The Council's Employment Land Needs Assessment (ELNA) (2022) forms part of the evidence base for the emerging Local Plan and sets out that over the plan period over 18,000 sqm of E(g)(i) and E(g)(ii) Office and Research & Development will be required, together with ~12,000 sqm of B8 Warehousing and Storage. This is a slight reduction from the Council's previously published ELNA (2018), which supported the Preferred Options consultation in 2020. The ELNA (2022) states that due to the locations and nature of the floorspace, it is unlikely that even with the reduced need for B2 use (expected to reduce in requirement by ~11,000 sqm) and associated release of that land for redevelopment, the identified need for other employment uses is unlikely to be met on those former B2 industrial sites.

Notwithstanding this, the Council has determined that the identified need for this employment floorspace can instead be met on brownfield sites and through intensification of existing ones, rather than through the release of Green Belt land. The Council states that it is the view of officers and Members that the need for employment floorspace without the proposed expansion of Heathrow Airport, together with relatively low level of need for employment floorspace identified in the ELNA (2022), the need can instead be met through re-use or intensification on existing sites, such that the need is not so great as to outweigh the harm caused by release of Green Belt sites for employment floorspace. The Council states that the collective view, in consultation with local residents, was that the more pressing need is for housing and that the community would prefer to see sites released for residential development over an employment use. The Council concludes that "This position can be revisited at the 5-year review stage of the Local Plan from adoption to take account of the status of the expansion plans at that time and the sites available to meet need".

As such, and as required by Paragraph 140 of the NPPF, the Council has concluded that Exceptional Circumstances do not exist, as required, to justify the alteration of the existing Green Belt boundaries to cater for this need. Consequently, the Council no longer proposes any Site Allocations and associated Green Belt release to deliver the required floorspace. This is a change of position from the Council's Preferred Options stage, where it had previously considered Exceptional Circumstances did exist, and proposed to release two sites in close proximity to those of Hund'ani & Company. Those sites are SN1/005 (Land at Northumberland Close, Stanwell) and SN1/006 (Land to west of Long Lane and south of Blackburn Trading Estate). We note that both sites are still proposed for release from the Green Belt, but on the basis that they could support residential development instead of employment uses. We do not agree with the Council's conclusion and consider that Exceptional Circumstances do exist to allow the release of Green Belt land to meet emerging need for employment floorspace. The NPPF advises that LPAs should "where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period" (paragraph 143©) and that as part of any review "be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period" (paragraph 143(e)) and "define boundaries clearly, using physical features that are readily recognisable and likely to be permanent" (paragraph 143(f)). Although temporarily on hold,

Heathrow Airport will continue to expand and additional land will be required to provide all of the infrastructure and services necessary to deliver this. The brownfield sites and intensification of existing sites will not alone be able to cater for this need. This was evidenced by the land previously identified by HAL as forming part of the obvious and logical masterplanning of the airport's growth. Therefore, future additional land will be required to support its growth and sites should be allocated now so that they can either be developed now or in the future once the expansion plans for Heathrow Airport resume. As such, Exceptional Circumstances do exist and the Council should propose the release of some weakly performing Green Belt land to meet the need, which would not adversely affect the integrity of the strategic Green Belt. Without this, we consider that the Local Plan will be unable to meet the stated identified need for E(g)(i), E(g)(ii) and B8 uses set out in the ELNA, which will only be exacerbated when Heathrow continues its plans for expansion, such that the Local Plan can be capable of being found sound at EiP.

With this in mind, Hund'lani & Company's sites at SN1/007a and SN1/014 are the most appropriate to meet this need, being available, developable and suitable, and should be proposed to be removed from the Green Belt and included as Site Allocations in the Local Plan. Both sites were assessed initially at Stage 1 of the Council's Green Belt Assessment, as part of the Local Area 6 and the Council's conclusion, when considered against the purposes of the Green Belt (as set out now in paragraphs 138 and 139 of the NPPF), was that the Local Area was "strongly performing". At Stage 2 of the Green Belt Assessment, which provided a finer grain assessment, the sites were considered as part of the wider subarea 6-d, which covered an area of 12 hectares. The Council's conclusion again was that the Green Belt sub-area was "strongly performing". However, we outlined in our letter of 21<sup>st</sup> January 2020 that we considered that the Council's approach was still too broad brush and meant that it had omitted two self-contained sites (SN1/007a and SN1/014) which should have been assessed independently as their own independent sub-areas. We provided an assessment of those sites in our letter of 21<sup>st</sup> January 2020 demonstrating that when considered individually and on their own merits, they perform weakly and should instead be recommended for release from the Green Belt. The Council has subsequently assessed these sites on an individual basis, concluding in each case that the sites are not considered appropriate for allocation and release for the Green Belt due to their performance against Green Belt purposes. The Council's assessment states that the sites should be discounted from consideration but reviewed at the five year review stage in the context of potential wider economic needs. We do not agree with the Council's assessment, for the reasons set out further below, and consider that both sites comprise weakly performing Green Belt (our assessment of both sites is found further below), with qualities more similar to brownfield and previously developed land. Both sites should be given a Site Allocation which would assist with meeting the identified need in the ELNA (2022).

Alternatively, if the sites at SN1/007a and SN1/014 cannot be given a Site Allocation for development now, the sites should be safeguarded for future development in line with Paragraph 143© of the NPPF, assisting with meeting "longer-term development needs stretching beyond the plan period" (NPPF Paragraph 143c ). Green Belt boundaries would therefore not need to be reviewed again in the future (Paragraph 143e ) and both sites can be defined by clear boundaries, with "physical features that are readily recognisable and likely to be permanent" (Paragraph 143f). With these amendments to the Green Belt boundaries, we consider that the Local Plan can be capable of being found sound at EiP.

SN1/014 Development Potential

This site comprises both previously developed land to the north and Green Belt land to the south, and together presents a logical commercial infill development site between Scania's development to the north and Esso to the east. With Scania's commercial development to the north, the commercial warehouses to the east and the existing established commercial use of the northern area of Mentone Farm, we consider that development of this site for commercial uses, inter alia, commercial, office (Use Class E(g)), general industry (Use Class B2) and/or storage or distribution (Use Class B8) would be entirely appropriate in this location.

This site is surrounded by development on two sides, to the north and east, and constitutes low quality land to the south, in use in connection with the existing site to the north, and any development on it would be seen in the context of surrounding development and would improve the existing situation. The site would make best use of the land and would provide a significant contribution to meeting the Borough's future employment needs.

Although included within the previous Airport Expansion Consultation One, HAL subsequently excluded this site from its DCO boundary, convinced that given the existing use of the northern area of the site, that Hund'lani & Company could achieve an allocation or planning permission for development for the whole site, without the need for a DCO.

Review of Officer's Site Assessment of Discounted Alternative Allocation Site SN1/014 (Mentone Farm)

The northern two thirds of the Mentone Farm site SN1/014 is previously developed land and the southern third is Green Belt, being used in connection with the use of the northern area as a yard, with hardstanding, storage and parking, and with an established use for the purchase, sale and repair of industrial vehicles and machinery. The site is enclosed by built form on two sides – to the north by Scania's site and to the east by Esso's site, including its pipeline which runs along the eastern boundary, and other commercial development to the east. The Council has acknowledged through its identification as a separate site from the remainder of the previous sub-area 6-d (and site reference SN1/007b to the west) that there do exist clear defensible boundaries, considered to be the 'additional boundary features' described by Table 3.1 in the Stage 2 Green Belt Assessment, through the presence of hedgerows, trees and a palisade fence line.

We do not agree that the release of this parcel of land from the Green Belt would harm the performance and integrity of the Green Belt, particularly by harming the integrity of the gap between Ashford/Sunbury/Stanwell and Greater London. As acknowledged by the Council, the site plays a limited role in terms of biodiversity and has limited townscape value, and we agree that any development on the site would provide an opportunity to improve the visual aesthetics. The removal of this land from the Green Belt would not constitute the loss of "green space", but instead space which does not perform its function as Green Belt, the reasons for which are expanded on further below.

Below we provide our comments against the Council's assessment of site SN1/014 as set out in the Officer Site Assessments – Discounted Alternative Allocation Sites document and provide as part of that our assessment of how the site performs in Green Belt terms.

Stage 2a – Contribution to the Delivery of the Strategy

The Council concludes that the site has a Spatial Strategy Score of 1 and that whilst promoted for employment use, only housing has been identified by the Council as warranting Green Belt release. We agree that the site is more likely to be suitable for an employment use but consider, as different to the

Council, that there are Exceptional Circumstances to justify the release of Green Belt land, such that this land would meet the Council's Spatial Strategy. The Spatial Strategy Score should therefore be '5' not '1'.

#### Stage 3 – Green Belt

The Council's conclusion for Stage 2aa and Stage 3a is that this area of Green Belt performs a strong role against Green Belt purposes. We do not agree and when assessed against the criteria set out in the Council's Stage 2 Assessment, we find that the site SN1/014 performs as set out in the table below. Our Green Belt Assessment has demonstrated that site reference SN1/014 would not perform strongly against the purposes of the Green Belt. It does not make an important contribution to the wider strategic Green Belt, does not provide an important barrier to sprawl, does not play a fundamental role with respect to the wider Green Belt Local Area, the release of this small area of Green Belt land would not harm the performance and integrity of the Green Belt, nor the integrity of the gap between Ashford/Sunbury/Stanwell and Greater London. The site would have a limited visual impact and does not make an important contribution to the wider strategic Green Belt and we consider that it warrants removal from the Green Belt.

#### Stage 4a – Overall Performance of Sites

We disagree with the Council's conclusion that the site has a mixed performance at Stage 2, but instead that it has a good performance, providing a number of benefits that would be associated with its development for employment uses, including significant improvements in terms of the condition of the land. We consider that its location and suitability for employment uses, immediately adjacent to Heathrow Airport, means that it would warrant Exceptional Circumstances for Green Belt release. We also disagree with the Council's conclusion that the site is strongly performing at both Stages 1 and 2 of the Green Belt Assessment, and that it is not recommended for release due to the fundamental role in the wider Green Belt area, with its loss harmful to integrity and performance of the Green Belt. Instead, as laid out further above, given the strong sense of enclosure already experienced this land and that its development would not result in encroachment, we consider that the site does not play a fundamental role in the wider Green Belt, performs weakly and would not result in harm to the integrity and performance of the Green Belt.

#### Overall Conclusions (please see page 22+ of document)

The Council acknowledges that previous documentation released by Heathrow Airport in connection with the proposed expansion suggested that the site could be used for airport related development, but that given the uncertainty associated with the possible expansion, there is limited evidence to support further consideration of this site as present. We do not agree. HAL has stated that following the Supreme Court's decision to legally re-instate the Airport National Policy Statement, it is currently reflecting on that judgement, ensuring that Heathrow Airport's recovery from Covid-19 is prioritised. It notes in respect of whether that means expansion is no longer required that the "Demand of aviation will recover from COVID-19, and the additional capacity at an expanded Heathrow will allow Britain as a sovereign nation to compete more effectively. Expansion would help the Government's ambitions for Global Britain to become a reality. By expanding Heathrow, the UK's only hub airport, we would be able to connect all of Britain to the growing markets of the world, levelling up all of the UK by helping to create hundreds of thousands of jobs in every nation and region of the country". So, it is inevitable that Heathrow will expand. We consider that the Council's assertion that the future demand can rely on existing brownfield sites and intensification of others is naïve, and instead land must be identified and allocated now, or safeguarded for the future, to cater for this. We consider that



site SN1/007a presents an available and developable opportunity for employment uses in close proximity to Heathrow Airport, which would not result in the loss of a strongly performing area of Green Belt. Whilst the Council acknowledges that this position could be reviewed at the next review of the Local Plan, we consider that this should be undertaken now.

The Site comprises of land both within and outside of the Green Belt, with the northern area in use as a yard with hardstanding, storage and parking, with an established use for the purchase, sale and repair of industrial vehicles and machinery, and the southern area within the Green Belt in use in connection with the use of the northern area.

The Site is surrounded by existing commercial and industrial development, and its development for commercial, office (Use Class E(g)), general industry (Use Class B2) and/or storage or distribution (Use Class B8) uses would be entirely appropriate and would present a logical commercial infill development site. The Green Belt area is also in poor condition, but with a strong sense of enclosure and with a lack of visual links to the wider open lands further to the south and west. The Site is well connected and has direct access to Bedfont Road to the north via Crane Road and lies in close proximity to London Heathrow and the Strategic Road Network, including the Southern Perimeter Road, M25 and M4 motorways.

When considered on its own merits, given its small size, cleared nature, existing use ancillary to the main parcel of land to the north, as well as the existing commercial/industrial land uses beyond the northern and eastern boundaries, it is considered that the site provides an entirely appropriate opportunity for infill development. Being on the edge of a larger Green Belt parcel, the site does not have a particularly rural or remote character in its own right. Given its proximity to commercial and industrial uses, including cargo businesses, any development of this site for commercial/industrial use would not negatively affect the wider area, and would be seen in context with those uses.

**Question 6:** You can upload any modifications below.

Hundlani \_ Company - Reg 19 Letter of Representations\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618814/PDF/->

[/Hundlani%20%5F%20Company%20%2D%20Reg%2019%20Letter%20of%20Representations%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618814/PDF/-/Hundlani%20%5F%20Company%20%2D%20Reg%2019%20Letter%20of%20Representations%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To confirm that Exceptional Circumstances exist to justify the release of Green Belt land for employment use, that the Council's Green Belt assessment of sites SN1/007a and SN1/014 is incorrect, and that both sites should be released from the Green Belt and given a site allocation for future development.

<b>Respondent: Tarun Hundalani (42239329)</b>
<b>Organisation: Hund'lani &amp; Company</b>

<b>Response ID: 1128193</b>
<b>Policy / Evidence Base / Part of Plan: Policy EC1: Meeting Employment Needs</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not Justified, Not Effective, Not Consistent with National Policy - were all selected. Policy EC1 is supported by the Council's updated ELNA (2022) and (1) states that economic growth in Spelthorne will be supported by maintaining and intensifying the use of the Borough's employment floorspace offer. This will be done by, inter alia, provision of new land in line with needs identified through the most up to date evidence. The Council states in Topic Paper 1 (Background and Exceptional Circumstances Case) of its Local Plan Evidence base that it has determined that the identified need for this employment floorspace can instead be met on brownfield sites and through intensification of existing ones, rather than through the release of Green Belt land. It concludes that it is the view of officers and Members that the need for employment floorspace without the proposed expansion of Heathrow Airport can instead be met through re-use or intensification on existing sites, such that the need is not so great as to outweigh the harm caused by release of Green Belt sites for employment floorspace. We do not agree. Although temporarily on hold, Heathrow Airport will continue to expand and additional land will be required to provide all of the infrastructure and services necessary to deliver this. The brownfield sites and intensification of existing sites will not alone be able to cater for this need. This was evidenced by the land previously identified by HAL as forming part of the obvious and logical masterplanning of the airport's growth. Therefore,

future additional land will be required to support its growth and sites should be allocated now so that they can either be developed now or in the future once the expansion plans for Heathrow Airport resume.

As such, Exceptional Circumstances do exist and the Council should propose the release of some weakly performing Green Belt land to meet the need, which would not adversely affect the integrity of the strategic Green Belt. Without this, we consider that the Local Plan will be unable to meet the stated identified need for E(g)(i), E(g)(ii) and B8 uses set out in the ELNA, which will only be exacerbated when Heathrow continues its plans for expansion, such that the Local Plan can be capable of being found sound at EIP

Given the proximity of Hund'ani & Company's sites to Heathrow Airport, the surrounding employment uses and their poor performance in Green Belt terms, they represent an ideal location for development in relation to either the expansion of Heathrow Airport or to meet employment needs generally in Spelthorne. Sites SN1/007a and SN1/014 should both be allocated for employment use and be included within the "Bedfont Road, Stanwell" Strategic Employment Area.

We therefore consider the approach taken to land required for Employment Needs disregards the future expansion plans for Heathrow, does not alter as necessary the Green Belt boundary, and is therefore not consistent with national policy, not therefore justified and as a consequence, this Policy is unsound.

See Separate Part B Representations made pursuant to Site References SN1/007a and SN1/014, and Carter Jonas' Cover Letter for further detail. See attached document for full response.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

The Green Belt boundary should be amended on the Policies Map to reflect the removal of sites SN1/007a and SN1/014 from the Green Belt. The sites should be included within the Bedfont Road, Stanwell Strategic Employment Areas, listed under Policy EC1. See Separate Part B Representations made pursuant to Site References SN1/007a and SN1/014, and Carter Jonas' Cover Letter for further detail.

**Question 6:** You can upload any modifications below.

Hundlani \_ Company - Reg 19 Letter of Representations\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618815/PDF/-/Hundlani%20%5F%20Company%20%2D%20Reg%2019%20Letter%20of%20Representations%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To confirm that Exceptional Circumstances exist to justify the release of Green Belt land for employment use and that sites SN1/007a and SN1/014 should be released from the Green Belt and given a site allocation for future development, to cater for future need for employment floorspace adjacent to Heathrow Airport.

<b>Respondent: Mr Chris Hyde (25674497)</b>	
<b>Organisation:</b>	
<b>Response ID: 1119562</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Publishing Evidence; Consultation Process	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: Soundness I am surprised that consultees are being asked to make a judgement at this stage on whether they consider the Plan to be sound, as I would expect that to be a matter to be considered by the Planning Inspector following full consideration of all	Additional Comments: <p style=""><strong><span style="">Soundness</span></strong> <p style=""><span style="">I am surprised that consultees are being asked to make a judgement at this stage on whether they consider the Plan to be sound, as I would expect that to be a matter
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Evidence Base	

The Pre-Submission Spelthorne Local Plan was published for consultation on 15 June 2022. Since then, from 6 July to 17 August, Spelthorne Borough Council has provided 21 updates or additions to the Evidence Base, which are set out in a table on the Council website.

<https://spelthorne.gov.uk/New-Local-Plan-Evidence>

These updates relate to significant aspects of the Evidence Base, including flooding, Green Belt, habitats and infrastructure, which I expect will have a material impact on the contents of the Local Plan. Either the Pre-Submission Local Plan has been prepared in the absence of all the required evidence, or that evidence was not shared with residents and other consultees when the Local Plan was released for consultation. If the former is applicable then it needs to be demonstrated how the Plan could be judged to be sound if it was prepared on an incomplete evidence basis. That has not been demonstrated to me therefore I cannot say that the Plan is sound.

#### Consultation Process

I am concerned that the Pre-Submission Spelthorne Local Plan was published for consultation before significant parts of the Evidence Base were shared. This is a concern for the following reasons:

\* Those taking the time and effort to prepare and submit responses would have done so on an incomplete basis. Having submitted their responses in good faith, the release of subsequent new or updated and amended evidence had the potential to undermine the validity of some or all of their responses, through no fault of theirs.

\* The 'drip feed' of elements of the evidence base after the publication of the Pre-Submission Plan, between 6 July and 17 August, had the effect of increasing the difficulty of preparing consultation responses, and either increasing the time and effort to respond or potentially misleading consultees who might be unaware of the availability of new evidence.

\* The closure of the consultation period was amended to 21 September however the Habitats Regulations Assessment including the Pre Screening Information, and the Planning for Housing Delivery Report were released on 17 August, leaving 5 weeks for consultation. My understanding is that the minimum period for consultation is 6 weeks.

I am also concerned that there are inconsistencies in the details of the consultation process. At least two consultation closure dates are given on the Council website, with 19 September and 21 September both appearing on the website. The original consultation end date of 5 September also still appears on the Council website. If dates change then the date should be amended on a consistent basis throughout the website. Also the downloadable Regulation 19 representation form differs from the format of the online questionnaire.

I do not consider my participation in the hearing session to be essential, however I would be happy to participate if it is considered useful by the Planning Inspectorate.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Emily Hyde (41367393)</b>
<b>Organisation:</b>

<b>Response ID: 1122444</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
I have read through the local plan and see this as an awful development of open space in our area, open space that could be developed for further recreation for our youth or elderly not to meet the governments ridiculous housing targets.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

**Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?**



Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Emily Hyde (41367393)</b>	
<b>Organisation:</b>	
<b>Response ID: 1125935</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
There isn't enough infrastructure for the area in place now, roads are busy, parking is poor, no one can get a GP appointment, A&E departments and NHS walk in centres are over run, there is no police presence – all of these areas need to be addressed before any further development plans are put forward. I do not approve of this plan,	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
We need to continue to protect our greenbelt, not start to eat into this, if we do this now where does this end? The high rise buildings proposed look awful and ruin the skyline.	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Emily Hyde (41367393)</b>
<b>Organisation:</b>

<b>Response ID: 1122445</b>
<b>Policy / Evidence Base / Part of Plan: Policy E3: Managing Flood Risk</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Flooding is already common in this area and building on open land will not help this.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No Response
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

Representations Made Under Regulation 20  
in Representor Order

<b>Respondent: Mrs Emily Hyde (41367393)</b>
<b>Organisation:</b>

<b>Response ID: 1122449</b>
<b>Policy / Evidence Base / Part of Plan: Policy ID1: Infrastructure and Delivery</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
There isn't enough infrastructure for the area in place now, roads are busy, parking is poor, no one can get a GP appointment, A&E departments and NHS walk in centres are over run, there is no police presence – all of these areas need to be addressed before any further development plans are put forward. I do not approve of this plan,
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

**Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?**

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: ICP Partnership Ltd (42255009)</b>
<b>Organisation:</b>

<b>Response ID: 1128211</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Also selected: Not justified, Not effective, Not consistent with national policy. These representations have been prepared on behalf of ICP Partnership Ltd. A site location plan of the land we are promoting is attached at Appendix A1. The site is ideally located to provide a desperately needed logistic or industrial development, which can address the significant local and regional needs. We consider that exceptional circumstances can be demonstrated by virtue of the significant need for economic development in this location and the absence of sites to deliver this in a strategic location such as this. Policy ST2: Planning for the Borough 5.1 We consider the proposed Development Strategy (as identified by the draft policy) needs amending, on the basis that it does not set out an appropriate strategy to meet the economic needs of the District and the wider area. 5.2 While the draft policy identifies a clear housing requirement (9,270 net additional dwellings over the Plan period) at part 1, in contrast part 2 makes a general reference to supporting economic growth but does not set out what the employment need is, or the quantum of net additional floorspace being planned for in the Local Plan. The strategy does not explain what the area’s objectively assessed needs are in relation to employment (taking account of



any unmet needs from neighbouring areas) and does not identify how these needs will be met, as a minimum, as required by paragraph 35 of the NPPF. We therefore do not consider that the policy is positively prepared in its current form. Meanwhile the lack of a specific employment floorspace requirement results in the policy being ineffective.

5.3 The Council's 2022 Employment Land Needs Assessment (ELNA) identifies a need for over 18,000 sqm of office and research & development floorspace and over 12,000 sqm of storage/ distribution floorspace over the period 2022-37. In this context, Policy ST2 identifies a broad strategy of maintaining and intensifying employment space through safeguarding existing sites and providing additional land in response to the latest evidence. However, there is no explanation or evidence to demonstrate how the additional floorspace required will be delivered through this strategy, in terms of potential sources of supply and the timing of new sites being delivered. As a result, we do not consider that the spatial development strategy is sound, as there is a lack of evidence to support delivery of the identified need, and thus the policy is not positively prepared or effective.

5.4 Furthermore, as discussed above we consider that the employment need is significantly greater than suggested in the ELNA, with 12,000 sqm of industrial and logistics space (4.8 ha) required in the District. The strategy identified at Policy ST2 is therefore based on a flawed and insufficient evidence base and is not justified. Accordingly, we disagree with the Council's assessment in the Sustainability Appraisal that Policy ST2 would have an overall positive impact in terms of economic development. In our assessment the policy would fail to meet employment needs and would not strengthen Spelthorne's economy.

5.5 In order to make the policy sound, it is necessary to amend the overall strategy to clearly identify the employment need and the associated requirements for the Plan period, and detail a strategy to meet the floorspace requirements which is based on the development of deliverable sites. Given the scale of the need identified, this will inevitably require the allocation of additional land. We discuss these points in further detail in relation to Policy EC1.

See attached pg.13

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Detailed discussions on Council's evidence base.

<b>Respondent: ICP Partnership Ltd (42255009)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128219</b>	
<b>Policy / Evidence Base / Part of Plan: Policy SP7: Heathrow Airport</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>Not effective, Not consistent with national policy - were also selected.</p> <p>Policy SP7: Heathrow Airport</p> <p>5.6 While we support the overall intention of the policy to support a future expansion of Heathrow Airport, we are concerned that the approach to Green Belt set out at part 1c of the policy would unduly restrict the potential growth and economic benefits associated with the airport's expansion.</p> <p>5.7 There are parcels of Green Belt to the south of Heathrow that serve little or no Green Belt function, which could be appropriately developed for airport related use in association with Heathrow's expansion. Rather than simply indicating that inappropriate development will be resisted except where Very Special Circumstances are demonstrated, we consider that the policy should commit to a further review of the Green Belt in the area surrounding Heathrow in association with future expansion proposals in addition to releasing sites now.</p> <p>5.8 Clearly, the future expansion of Heathrow and the very significant economic benefits associated with any such proposals would be a significant factor capable of contributing towards an Exceptional Circumstances case to release Green Belt land, and the expansion of the airport could result in</p>	

significantly greater need for employment floorspace to support its operation. In such circumstances it would therefore be necessary to re-examine the adopted development strategy and in particular to ensure the development potential of sites located in close proximity to the airport was maximised.

5.9 We are concerned that the lack of any reference to a review of the Green Belt and wider strategy for the area adjacent to Heathrow would potentially limit the airport's ability to effectively expand and for the Plan to adapt to changing circumstances. We therefore consider that in order make the policy sound, it should include a commitment to a review of the Plan's strategy (including the employment strategy) and a re-examination of the Green Belt in this area should proposals for the expansion of Heathrow progress.

#### Conclusions

6.3 The site is relatively unconstrained in environmental terms and while it is located within the Green Belt it has not been adequately assessed in the evidence base. The site is surrounded on almost all sides by development and does not meet the NPPF's criteria for Green Belt. It would be logical release, providing infilling of the existing urban form.

6.4 Releasing this site from the Green Belt is justified by exceptional circumstances – meeting an established need on a poor quality site. Furthermore, it would remedy a soundness issue within the Local Plan, before it is taken to Examination. We urge the local authority to amend the Local Plan accordingly.

See attached document for full response

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Detailed discussions on Council's evidence base.

<b>Respondent: ICP Partnership Ltd (42255009)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128221</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy EC1: Meeting Employment Needs	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>Policy EC1: Meeting Employment Needs</p> <p>5.10 As discussed in relation to Policy ST2, we object to the overall strategy relating to employment needs as in our assessment it is not effective or justified. We also object to the further details included at draft Policy EC1 for the reasons set out below.</p> <p>5.11 Part 1 of the policy indicates that new employment land will be provided in line with needs identified through the most up to date evidence. While this may in theory provide a flexible approach allowing additional employment land to be identified as needed throughout the Plan period, we are concerned that the policy lacks a mechanism to effectively deliver additional employment land that may be required. There are no specific details provided as to how additional land will be identified for development, or what the potential capacity from such additional supply may be over the Plan period, having regard to the availability and suitability of such sites. Furthermore, even if additional land were identified as being suitable for</p>	

development, it is unclear whether this would come forward for the employment land needed or whether it would be developed for other uses such as residential development.

5.12 As a result, we do not consider that the policy is justified or effective, as there is no evidence to demonstrate that additional land can be identified in the event that a higher level of need arises in future, and there is no mechanism to identify and bring forward such land.

5.13 It is also important to consider the Green Belt context within Spelthorne in relation to identifying additional land for development in response to changing levels of employment need. Any notable additional employment need is likely to require release of Green Belt land to meet identified needs, and the presence of an acute need for additional employment land would potentially contribute to an Exceptional Circumstances/ Very Special Circumstances case for the release of Green Belt.

5.14 Paragraphs 140 and 143 of the NPPF direct that Green Belt boundaries should be capable of enduring beyond the end of the Plan period and that the boundaries should be considered permanent in the long term. We consider that the Council should be making the necessary provision within this Local Plan to meet future needs, rather than the vague reference in the draft policy to meeting additional needs as they arise, and the resulting need to further amend Green Belt boundaries at that stage. Accordingly, we consider that in order to make the policy sound it is necessary to allocate additional land for employment development at this stage, to provide sufficient flexibility to meet future (and current) employment needs without further successive releases of Green Belt within the next 15 years and beyond.

5.15 Furthermore, in relation to part 3 of the policy, we consider that the wording is too vague and is not clear in terms of expectations regarding sustainability requirements for development proposals. The policy text refers to sustainability measures, such as sustainable design and carbon reduction, however there is no detail regarding any specific percentage of carbon reduction or any particular standards such as BREEAM ratings. This element of the policy therefore does not provide a clear guide for future developers or an indication as to how decision makers should assess development proposals. The lack of detailed requirements and guidance results in the policy being ineffective in our view, and in order to make it sound, additional detail should be provided.

#### Conclusions

6.1 The site is strategically located to the south of Heathrow Airport, with excellent links to the M4 and M25. It can accommodate up to 15,500 sq m of industrial or logistics floorspace.

6.2 There is a considerable and unidentified unmet need for employment floorspace in the District which is not currently recognised in the Local Plan. The 12,000 sq m needed within the District, does not include the likely increased requirements from expanding Heathrow Airport, which should also be taken in to account when setting employment targets for the site.

See attached document for full rep.

**Question 6:** You can upload any modifications below.

APL- 174\_ Red line Map.jpg

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/615753/PJP/-/APL%2D%20174%5F%20Red%20line%20Map%2Ejpg>

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[/220912%20Stanwell%20Redacted%20Reps%20%2D%20ICP%20Partnership%20Ltd%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/617284/PDF/-/220912%20Stanwell%20Redacted%20Reps%20%2D%20ICP%20Partnership%20Ltd%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Detailed discussions on Council's evidence base.



<b>Respondent: ICP Partnership Ltd (42255009)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128215</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Evidence base - ELNA	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
8. ECONOMIC DEVELOPMENT EVIDENCE BASE	
3.1 The Spelthorne Employment Land Needs Assessment (ELNA) 2022 (published in draft) has not been prepared in accordance with the Government's Planning Practice Guidance (PPG) and as a result this element of the Plan is not in accordance with the NPPF. We strongly recommend amending the plan to ensure it withstands scrutiny at the Examination and avoid accusations that it has not been prepared positively, nor does it support economic growth and productivity, taking into account both local business needs and wider opportunities for development. (para 81).	
3.2 The ELNA includes:	

- A brief review of third-party commentary on the local commercial market, the vast majority of which is dedicated to the office market, with little on the industrial market. The brief industrial review does refer to record levels of demand and that Staines-upon-Thames achieves some of the highest industrial rents in the market area.

- Uses employment forecasts from Oxford Economics and Cambridge Econometrics to determine future jobs change which indicate losses of c.11,300 sqm in B2 and gains of 12,000 sqm in B8, recognising that B2 losses are not like for like exchanged to B8 gains (this point is not reflected in the emerging Local Plan).

3.3 The ELNA is a highly simplistic document that makes no attempt to reconcile market signals with its approach to forecasting employment land use. This results in the Pre-submission Spelthorne Local Plan making no provisions for industrial and warehousing development contrary to the ‘all time high’ demand in the sector.

3.4 This does not sufficiently respond to the following PPG requirements can be highlighted in reference to the following paragraphs that set out how authorities should determine their needs for employment land:

- evidence of market demand (including the locational and premises requirements of particular types of business) – sourced from local data and market intelligence, such as recent surveys of business needs, discussions with developers and property agents and engagement with business and economic forums;

Paragraph: 026 Reference ID: 2a-026-20190220

- analysis based on the past take-up of employment land and property and/or future property market requirements
- consultation with relevant organisations, studies of business trends, an understanding of innovative and changing business models, particularly those which make use of online platforms to respond to consumer demand and monitoring of business, economic and employment statistics.

Paragraph: 027 Reference ID: 2a-027-20190220

The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land).

- engagement with logistics developers and occupiers to understand the changing nature of requirements in terms of the type, size and location of facilities, including the impact of new and emerging technologies;
- analysis of market signals, including trends in take up and the availability of logistics land and floorspace across the relevant market geographies;

[Paragraph: 031 Reference ID: 2a-031-20190722]

3.5 The key issues with the ELNA are therefore:

- a failure to engage with local business organisations
- a failure to reflect property market requirements and demand
- failure to reflect market signals

3.6 In understanding an appropriate approach to considering employment needs the following employment matters are highlighted:

- At the national level the COVID-19 pandemic has seen a major restructuring of the industrial and logistics sector. National industrial vacancy is at an all time low and supply levels are critically low in many areas including London, the South East and Surrey.
- According to CoStar, vacancy rates for industrial property in Spelthorne have averaged 4.0% in the last 5 years (2017-21) and are below the Surrey average. Rates below 5% general indicate a market failure as there is insufficient choice for growth and inward investment. At September 2022 vacancy is 2.9% and not expected to see any rise. New development opportunities are critically required to enable an environment to support local business.
- Rents have risen hugely in the last 5 years by nearly 50% in Spelthorne, averaging 7% per annum, a fundamental metric in ascertaining the demand supply balance and indicating severe restriction in supply.
- CoStar reports that across Surrey as a whole, logistics and e-commerce-related businesses are driving strong demand... These factors have seen rental growth in the market increase, with Surrey now the most expensive UK industrial submarket outside the capital.
- Spelthorne hosts some of the South East's most critical infrastructure corridors including the M3, M25 and A308 and is adjacent to Heathrow, the country's busiest airport. It is an area of extreme high demand for industrial and logistics premises.
- The authority continues to permit losses of its industrial space to residential premises, as per table 14 in the ELNA, but no effort is made to provide replacement premises to meet the clearly high levels of need.
- According to CoStar the majority of industrial buildings in Spelthorne are dated, with only 17% being built since the 1990s. There is a need for new modern buildings to support business needs and growth. The government places the energy performance of commercial buildings of great importance and the renewal of existing stock plays a critical role in this.
- The authority assessment builds in no margin for error in the forecasts, which is common and good practice in employment land modelling.

3.7 In light of the above market indicators, the approach to industrial land needs in the ELNA and Pre-submission Spelthorne Local Plan does not meet the requirements of the NPPF or PPG. There is no provision for additional floorspace.

3.8 As a minimum, we consider that the authority should be providing 12,000 sqm of industrial and logistics space (4.8 ha) reflecting its gross requirements in B1©/B2/B8 floorspace. This ensures that growing industry has premises to move into to meet demand, and that there is space to reduce the extreme low vacancy rate and excessive rental increases.

See attached documents for full response

**Question 6:** You can upload any modifications below.

APL- 174\_ Red line Map.jpg

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Yes - Detailed discussions on Council's evidence base.

<b>Respondent: ICP Partnership Ltd (42255009)</b>
<b>Organisation:</b>

<b>Response ID: 1128216</b>
<b>Policy / Evidence Base / Part of Plan:</b> Evidence base - ELNA
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
GREEN BELT ASSESSMENT 4.1 The Council's Phase 1 Green Belt Assessment parcels the Green Belt up in to 58 Local Area for initial assessment. A number of sub-areas are then considered for release from the Green Belt, depending on the outcome of the assessment. This is a relatively standard approach and the principles behind this are sound. 4.2 Our concerns relate to the decision to consider some sub-areas, but not others. The parcels of land range from 1.1 hectares in size up to over 350 hectares. Clearly there may be further opportunities within the large parcels and this has been identified in a limited number of opportunities. 4.3 Land East of Short Lane is located within Local Area 8 which covers 98 hectares and is shown below. (see page 14 pf attached document).

4.4 Despite being divided by a railway line and an unusual shape, the Local Area has been assessed as a whole. It is considered unlikely that the whole of the Local Area would share the same characteristics. The most northern part of the Local Area where the site is located is close to the settlement boundary and is almost completely surrounded by development. This is very different to land to the south of the railway line, which is more open and might play some role in protecting urban areas from merging into each other.

4.5 As such, the Green Belt Assessment concludes that the Local Area scores well against the NPPF Green Belt criteria and should not be considered for release. As can be seen from Local Area 5 to the west, when a smaller area of the land closer to the settlement boundary is assessed then it scores poorly against the NPPF Green Belt criteria.

4.6 We consider that Local Area 8 should have been sub-divided in subsequent Green Belt Assessments. There is clear evidence (from the scoring of Local Area 5) that the northern part of this area could also have scored poorly and thus been recommended for release for development.

4.7 Looking at Land East of Short Lane in isolation, it is clear that it has limited Green Belt value. There is development in all directions meaning its development would not impact on the openness of the Green Belt and its location does not play a role in avoiding the merging of settlement. Furthermore, while there is some limited open space to the north, this is used for open storage and is not undeveloped greenfield land, further urbanising the character of this location.

4.8 To remedy this soundness issue, we consider that Local Area 8, should be reassessed in Green Belt in an addendum to the Phase 3 Green Belt Assessment.

See attached for full response

**Question 6:** You can upload any modifications below.

APL- 174\_ Red line Map.jpg

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/615742/PJP/-/APL%2D%20174%5F%20Red%20line%20Map%2Ejpg>

APL-174 Redacted - Stanwell 3167-02 Feasibility Layout Plan - ICP Partnership Ltd.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/617278/PDF/-/APL%2D174%20Redacted%20%2D%20Stanwell%203167%2D02%20Feasibility%20Layout%20Plan%20%2D%20ICP%20Partnership%20Ltd%2Epdf>

220912 Stanwell Redacted Reps - ICP Partnership Ltd.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/617279/PDF/-/220912%20Stanwell%20Redacted%20Reps%20%2D%20ICP%20Partnership%20Ltd%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Yes - Detailed discussions on Council's evidence base.

<b>Respondent: Inspired Villages Ltd (43043713)</b>
<b>Organisation:</b>

<b>Response ID: 1127900</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not Justified, Not Effective, Not Consistent with National Policy - were also selected Please see attached representation. In summary, the crux of the objections are as follows: <ul style="list-style-type: none"> <li>▪ Level of housing proposed (Standard Method) does not allow for contingency and is therefore not robust or positively prepared;</li> <li>▪ Lack of recent delivery, 5YHLS, unmet need in Elmbridge and lack of contingency warrant a higher housing requirement;</li> <li>▪ Level of windfall sites anticipated is unachievable and speculative, most sites need to be formally allocated to be sure the level of housing proposed is achievable. This is especially the case when such a large percentage of sites are already allocated within the urban area, and yet Green Belt release was still needed;</li> <li>▪ Green Belt Assessment is flawed due to it not being fine-grain, and no exceptional circumstances report published;</li> <li>▪ Further sites should therefore be allocated to account for excessive windfall provision and to allow contingency;</li> <li>▪ No C2 / older persons housing is allocated despite a clear need;</li> </ul>



▪ Alongside the provision of further evidence in the form of an update to the Green Belt Review and production of an Exceptional Circumstances report, Land at Vicarage Road should be allocated in Policy ST2 to help overcome these concerns.  
Please see Section 3 of supporting report

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

See attached representation. In summary, IV consider the main changes need to be made to make it sound:

- Greater number of sites allocated, including allocation and monitoring of specific C2 units;
- Update to the evidence base documents to address errors and incorrect discounting, including to the Green Belt Review to review smaller parcels of land such as Land at Vicarage Road;
- Production of an Exceptional Circumstances Report;
- Less reliance on speculative windfall sites replaced with a mixture of housing allocations; and
- Need for further Green Belt release to accommodate for the objectively assessed need (including Land at Vicarage Road) to ensure the plan is positively prepared and ultimately sound in accordance with NPPF paragraph 35;

**Question 6:** You can upload any modifications below.

220819 - Redacted SBC Regulation 19 - Inspired Villages Ltd\_Redacted.pdf

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220912 - Redacted\_ SBC R19 Rep IV Supplement - Inspired Villages Ltd[3877]\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618884/PDF/-/220912%20%2D%20Redacted%5F%20SBC%20R19%20Rep%20IV%20Supplement%20%2D%20Inspired%20Villages%20Ltd%5F3877%5F%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To help Spelthorne Borough Council produce a sound Plan and set out Inspired Village's case in terms of the necessary modifications to the Plan in order to achieve this.



<b>Respondent: Inspired Villages Ltd (43043713)</b>
<b>Organisation:</b>

<b>Response ID: 1128636</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not justified, Not effective, Not consistent with national policy - were also selected. See pages 4 - 15 for full rep, includes relevant tables . Draft Policy ST2: Planning for the Borough – object Housing Provision 2.13. IV recognise that the housing requirement for Spelthorne given in draft policy ST2 is 618 dwellings per annum (dpa) over the plan period, a total of 9,270 dwellings. This reflects the minimum figure set out in the Government’s Standard Methodology for calculating local housing need. Yet, IV consider this figure should be higher for the reasons set out below. Housing Delivery Test and Housing Land Supply 2.37. Another factor which indicates that a greater supply over and above the Standard Method minimum is recent delivery and completions within Spelthorne. In the 2021 Housing Delivery Test, SBC only delivered 69% of their housing requirement. The April 2021 Five Year Housing Land Supply

Statement also indicated a deficit of 403 dwellings over a 5-year period, resulting in a 4.5 year housing land supply, against the Standard Method Minimum. This was also corroborated at a recent Appeal, Appeal (APP/Z3635/W/21/3280090) in Staines-upon-Thames, where the Inspector noted: “The parties agree that the Council cannot demonstrate a five year supply of housing land. This, and the provision of housing in an area where there has been an under-delivery of housing as shown by the Housing Delivery Test scores, attracts significant weight. Both main parties agree that there provision of housing shall attract significant weight”.

2.38. These shortfalls in both completions and supply are not picked up in the housing supply in draft Policy ST2, nor does it result in a higher figure to account for previous undersupply. IV would consider that this previous circumstance, in conjunction with the other points raised above, create circumstances where a higher housing figure should be considered.

#### Green Belt Release / Allocations

2.39. As shown in the sources of supply, 829 units are planned to be delivered on sites which are currently in the Green Belt at the present time. This equates to 15 sites and 0.7% of all Green Belt land in Spelthorne. These are broken down in Table 2.1 below, with the following suggestions in red: (page 8).

#### Green Belt Review / Assessment

2.49. IV question the way the Sites were assessed in both the Green Belt Review Stage 1 and Green Belt Review, Stage 2 by ARUP.

#### Summary

2.84. In summary, IV has strong concerns with draft Policy ST2. The crux of the objections are as follows: ▪ Level of housing proposed (Standard Method) does not allow for contingency and is therefore not robust or positively prepared;

- Lack of recent delivery, 5YHLS, unmet need in Elmbridge and lack of contingency warrant a higher housing requirement;
- Level of windfall sites anticipated is unachievable and speculative, most sites need to be formally allocated to be sure the level of housing proposed is achievable. This is especially the case when such a large percentage of sites are already allocated within the urban area, and yet Green Belt release was still needed;
- Green Belt Assessment is flawed due to it not being fine-grain, and no exceptional circumstances report published;
- Further sites should therefore be allocated to account for excessive windfall provision and to allow contingency;
- No C2 / older persons housing is allocated despite a clear need;
- Alongside the provision of further evidence in the form of an update to the Green Belt Review and production of an Exceptional Circumstances report, Land at Vicarage Road should be allocated in Policy ST2 to help overcome these concerns.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To help Spelthorne Borough Council produce a sound Plan and set out Inspired Village's case in terms of the necessary modifications to the Plan in order to achieve this.

<b>Respondent: Inspired Villages Ltd (43043713)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128000</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>Draft Policy PS1: Responding to the climate change emergency; – support</p> <p>2.85. IV fully supports the thrust of this policy and ensuring that all development must respond to the climate emergency. In developments, IV target to achieve Net Zero Carbon (Regulated Energy) in all their new Integrated Retirement Communities and to achieve Net Zero Carbon Buildings by 2030. Construction and design features include:</p> <ul style="list-style-type: none"> <li>▪ New and emerging low carbon technologies such as air source or ground source heat pumps and photovoltaics;</li> <li>▪ High efficiency lighting and plant systems;</li> <li>▪ Sustainable design of the buildings;</li> <li>▪ Providing better air tightness;</li> <li>▪ Allowing a layout to provide a policy complaint level of electrical vehicle (EV) charging infrastructure for all parking spaces.</li> <li>▪ Village transport service for short trip services (e.g. shopping or hospital visits), to reduce the reliance on the private car. 2.86. Overall, IV support this policy.</li> </ul>	

See page 15 of rep.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To help Spelthorne Borough Council produce a sound Plan and set out Inspired Village's case in terms of the necessary modifications to the Plan in order to achieve this.

<b>Respondent: Inspired Villages Ltd (43043713)</b>	
<b>Organisation:</b>	
<b>Response ID: 1127917</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS2: Designing places and spaces	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Aslo selected: * Not justified * Not effective * Not consistent with national policy	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Draft Policy PS2: Designing Places and Spaces; –comment	



2.87. IV largely support this policy, albeit with suggested modifications, and support its aim to provide a high standard of new development. IV particularly welcome the comment in paragraph 7, which mention how major developments 'should create their own identity to ensure cohesive and vibrant neighbourhoods.'

2.88. The following amendments are suggested to add clarity to the matter of accessibility (red text should be added, and strikethrough deleted): All new development will be designed to meet the needs of all users and be accessible to all, such as including M4(2) accessible dwellings. This includes the setting of the building in the wider environment, the location of the building on the plot, the gradient of the plot, transport infrastructure and public realm. SEE PAGE 15 FOR SUGGESTION.

2.89. This helps provide clarity to the meaning of accessible and aid developers in formulating planning applications.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: To help Spelthorne Borough Council produce a sound Plan and set out Inspired Village's case in terms of the necessary modifications to the Plan in order to achieve this.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Inspired Villages Ltd (43043713)</b>	
<b>Organisation:</b>	
<b>Response ID: 1127904</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS3: Heritage, Conservation and Landscape	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
* Not justified * Not effective * Not consistent with national policy - were all selected	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Draft Policy PS3: Heritage, Conservation and Landscape – comment 2.90. It is clear that local policies should avoid unnecessary duplication of policies and guidance. The NPPF, in Chapters 15 and 16, provides clear and legible guidance on how to approach Heritage matters, how to balance harm and how a decision maker should assess proposals that cause harm.	

2.91. Proposed policy PS3 (sections Heritage, Scheduled and Ancient Monuments & Archaeological Areas and Conservation Areas) do not add anything over and above what is required for decision making in national guidance and relevant legislations concerning Conservations Areas and Listed Buildings. They appear to be unnecessary and repeat guidance and requirements already instilled in the planning system when dealing with heritage assets.

2.92. IV would suggest that this aspect of this policy is deleted, and a note is added to Policy PS2 suggesting that planning applications should follow up to date national heritage guidance. This avoids unnecessary duplication. Alternatively, Paragraph 1) could be kept and 2) – 11) deleted.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To help Spelthorne Borough Council produce a sound Plan and set out Inspired Village's case in terms of the necessary modifications to the Plan in order to achieve this.

<b>Respondent: Inspired Villages Ltd (43043713)</b>	
<b>Organisation:</b>	
<b>Response ID: 1127899</b>	
<b>Policy / Evidence Base / Part of Plan: Policy H1: Homes for All</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Not justified, Not effective, Not consistent with national policy - were all selected.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Draft Policy H1: Homes for All - object (see page 16 - 19 for several suggestions) 2.96. Much of what is written under draft Policy H1 (regarding objectively assessed need, housing provision and needs for older people) is relevant for Policy H2 and will not be repeated in full for conciseness. 2.97. Yet, of particular note, the Policy is not clearly written and unambiguous, in contrary to NPPF Paragraph 16. The separate headings of the Policy will be taken in turn: Housing Need 2.98. This section of the policy makes no distinction or mention of encouraging a mix of uses to meet local need for specific groups or a need for specialist accommodation This local need is summarised in Section 6 of the SBC SHMA Update (2019) and should be reflected in policy.	

2.99. The policy is suggested to be amended as follows, notwithstanding IV's previous objection above to the current housing requirement of 618dpa proposed:

1) The Council will make provision for at least an additional 618 homes per annum in Spelthorne Borough over the plan period. SBC will encourage Proposals to meet the needs of specific groups.

#### Housing Mix and Standards

2.100. Likewise with the Housing Need section, as well as setting out identified housing need, the policy should better reflect that a mix of uses is encouraged to help meet local need. This includes C2 development such as care homes, extra care, integrated retirement communities and retirement living.

2.101. IV welcome the policy wording that appreciates the need for older persons housing through Emerging Policy H1: Homes for All. This states in general, that the provision of well- designed specialist forms of accommodation, including care homes and other appropriate forms of accommodation for the elderly and those with particular needs, will be permitted. Yet, IV are concerned by the lack of individual requirement / target for specialist accommodation. This is clearly set out in the SHMA and should be reflected in local policy. Amendments suggested are below:

2) New residential development is required to deliver a wide choice of homes to meet a range of accommodation needs and to meet the needs of specialist groups. New development should provide a mix of housing tenures, types and sizes appropriate to the size, characteristics and location.

3) Development proposals will be expected to contribute to meeting identified housing needs by having regard to the housing type and size mix as set out in the Strategic Housing Market Assessment or any similar evidence for market and affordable units. The Council will encourage specific Proposals to meet the needs of specialist groups to meet the identified need identified in the SHMA. This includes Proposals to meet the need for older people including Care Homes, Sheltered Housing, Integrated Retirement Communities or Retirement Living.

#### Accessible Homes

2.102. No comment.

#### Specialist Accommodation

2.103. As mentioned in IV's representation under draft Policy ST2, the evidence base for the emerging Local Plan identifies a need for the provision of older persons' accommodation over the plan period. The need for all types of older persons housing has most recently been set out in the 2019 Strategic Housing Market Assessment (SHMA) Update, commissioned by SBC and undertaken by GL Hearn. In total, GL Hearn calculate there will be a shortfall of 1,490 specialist units by 2035, without any additional supply. A review would also be necessary of the specialist housing need target minimum figures before being included in policy.

2.104. Yet, despite draft Policy H1 suggesting that Proposals should contribute to meeting identified needs set out in the SHMA, the emerging Local Plan does not set a specific target or provision. Nor does it set out any allocations which will meet this need (all allocations are either C3 or not specifically C2 / older persons housing). IV strongly consider that this level of need should be set out in policy, so that it can be monitored over the plan period and it

can be achieved positively. Without it, the needs of these groups will likely remain outstanding. This does not plan positively, nor does it contribute to the aim of achieving sustainable development.

2.105. Furthermore, C2 allocations are essential to provide a fair and accurate measures of issues related to the size of such schemes, significant amounts of non-saleable floorspace, significant time taken to sell each unit and difficult for IRC operators to compete on land values with general needs housing. There are viability challenges for Extra Care housing which should be acknowledged through the Local Plan and then considered through relevant policies.

2.106. Ultimately, if specific sites are not allocated through the Local Plan for different forms of housing for older people, and the viability challenges for such forms of housing are not acknowledged through policy, retirement community developers will not be able to compete in the market to buy land, and this type of accommodation will not be delivered to meet the existing and forecast significant need for specialist housing in the borough.

2.107. Our suggestions in Policy ST2 remain outstanding, and are relevant for this section. SBC should set out in Policy ST2 specific allocations for C2 uses, so that outstanding need can be met via positive planning.

2.108. Besides, IV would offer the following policy wording (notwithstanding the above). This amended wording adds positive wording to the policy, and that sites coming forward for specialist uses will be encouraged.

10) The Council will strongly encourage sites to come forward which will meet the provision of well designed specialist forms of accommodation, including sheltered housing, care homes, integrated retirement communities and other appropriate forms of accommodation for the elderly and those with particular needs. These will be permitted provided that the development:

(a) Meets demonstrable established local community need; and

(b) Is in a sustainable location, with access to appropriate services and facilities where these are not provided on site. This includes public transport, shops, local services and community facilities.

11) Where specialist accommodation falls within use class C3 only, an appropriate proportion of affordable housing in accordance with Policy H2 will be required, with the mix of tenures negotiated by the Council having regard to advice from appropriate specialist bodies.

12) The Council encourages mixed development that include an element of specialist accommodation (including sheltered housing, supported housing, extra care housing and residential/nursing care homes) on larger schemes where the character and size of the site allows.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To help Spelthorne Borough Council produce a sound Plan and set out Inspired Village's case in terms of the necessary modifications to the Plan in order to achieve this.

<b>Respondent: Inspired Villages Ltd (43043713)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128004</b>	
<b>Policy / Evidence Base / Part of Plan: Policy H2: Affordable Housing</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Not positively prepared, Not justified, Not effective, Not consistent with national policy - were all selected	
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Draft Policy H2: Affordable Housing - comment (see page 19 of document)	
2.109. IV largely support this policy, yet offer some additional wording to add clarity. This is to meet NPPF Paragraph 16 (d), being that policies are clearly written and unambiguous.	
2.110. As is mentioned in draft Policy H1, specialist accommodation which falls within use class C3 will be liable for an appropriate provision of affordable housing. This is reflected in sub paragraph (g) of draft Policy H2, which states that the requirement to provide affordable housing will apply to residential development falling under use class C3.	



2.111. IV therefore read this policy as dwellings under any other use class, such as C2, will therefore not require any affordable housing. It is encouraging SBC acknowledge the viability challenges faced by extra care operators and developers. This is a common way of viewing C2 uses, which is also the case in Runnymede Local Plan Policy SL20 and Policy H2 of the Guildford Local Plan.

2.112. Policy should therefore make this explicit.

Suggested changes in red:

The requirement to provide affordable housing will apply to all residential development falling under Use Class C3 only with the exception of Gypsy & Traveller Pitches or Travelling Showman Plots. The affordable Housing requirement will not apply to C2 use classes.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To help Spelthorne Borough Council produce a sound Plan and set out Inspired Village's case in terms of the necessary modifications to the Plan in order to achieve this.

<b>Respondent: Inspired Villages Ltd (43043713)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128005</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E1: Green and Blue Infrastructure	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Not justified, Not effective, Not consistent with national policy - were also selected	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Draft Policy E1: Green and Blue Infrastructure - object (see page 19 - 20 for modifications)	
2.113. IV consider this policy is not positively prepared, and potentially seek works beyond the capability of developers and applicants. Whilst being aspirational, policies should also be deliverable (NPPF, Paragraph 16). Measures should be limited to works and improvements that are within the applicant's control, as to make the policy deliverable.	
2.114. It is noted that it may not also be practical or desirable for blue infrastructure improvements if the Site conditions do not dictate. This should be informed by technical input and the policy should allow for relevant flexibility.	
2.115. Therefore, IV suggests the following change to the following elements of the Policy to ensure it is achievable:	

Where feasible and appropriate, development must contribute towards the provision, protection and enhancement of the wider green infrastructure network at a scale commensurate with the proposal.

All proposals for major development will be required to provide a high standard of design for green infrastructure in accordance with established, recognisable standards, including the National Design Guide, the Natural England Green Infrastructure Framework and Building with Nature Standards. Where a watercourse or reservoir is within a development boundary, proposals must contribute towards the delivery of a high quality multi-functional blue infrastructure network through ensuring the protection and enhancement of the ecological, landscape and recreational value of that water body. Development proposals impacting upon rivers and watercourses must demonstrate how they will, where feasible, maintain and enhance the quality of blue infrastructure, in accordance with the Water Framework Directive.

Where planned and informed by technical input, Green and blue infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits and should ensure appropriate long term stewardship arrangements are in place to secure the quality of green and blue infrastructure in perpetuity. Development should have regard to and contribute towards any Green and Blue Infrastructure Strategy/SPD that is produced.

**Question 6:** You can upload any modifications below.

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Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To help Spelthorne Borough Council produce a sound Plan and set out Inspired Village's case in terms of the necessary modifications to the Plan in order to achieve this.

<b>Respondent: Inspired Villages Ltd (43043713)</b>	
<b>Organisation:</b>	
<b>Response ID: 1127915</b>	
<b>Policy / Evidence Base / Part of Plan: Policy E2: Biodiversity</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
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Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
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If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Not justified , Not effective, Not consistent with national policy - were all selected Draft Policy E2: Biodiversity - Support IV support the main thrust of this policy and the need for development proposals which restore, maintain and enhance habitat connectivity. IV particularly welcome the requirement for all development to provide at least 10% net gain, and will seek a minimum of this in any application which is proposed on the Land at Vicarage Road Site	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No Response	
<b>Question 6: You can upload any modifications below.</b>	
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Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To help Spelthorne Borough Council produce a sound Plan and set out Inspired Village's case in terms of the necessary modifications to the Plan in order to achieve this.

<b>Respondent: Inspired Villages Ltd (43043713)</b>
<b>Organisation:</b>

<b>Response ID: 1127903</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E4: Environmental Protection
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not justified, Not effective, Not consistent with national policy - were also selected. Draft Policy E4: Environmental Protection - comment ( see pages 20-22 ) 2.117. IV are supportive of the overall objectives of this policy. However, they raise a few concerns with the policy as worded as it is not positively prepared and could be made clearer, and guided by national guidance in certain regards. 2.118. The application of World Health Organisation (WHO) Guidelines is also at odds with NPPF Paragraph 186. Policy is clear that ‘planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants’ 2.119. The NPPF does not mention WHO guidelines, therefore to be compliant with national policy it should state national policy instead. 2.120. IV support the need for development to minimise pollution and not exacerbate poor air quality in locations. Yet, raises concern with the requirement to be air quality neutral. There is no definition of what this is, how it can be achieved and what developers are expected to do in order to meet this (as required by NPPF Paragraph 16 (D)). Whilst the London Plan has guidance relating to Air Quality Neutral, this is not policy within SBC nor is this policy underpinned by appropriate evidence or viability testing. It should therefore either be removed or expanded upon as above.

2.121. If SBC are minded to keep the requirement of Air Quality Neutral in the plan, they should under definitions of the reasoned justification, define what 'Air Quality Neutral' is and how it should apply.

2.122. The Policy should also list examples of mitigation measures which are welcomed by SBC to help developers know how to respond to E4 (1). Currently, the wording 'prevent further deterioration' is vague.

2.123. IV also note the national policy requirements concerning light pollution, which is set out in NPPF Paragraph 185 ©. This states that development should 'limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation'.

2.124. Whilst IV understands that SBC may want to build upon this requirement, the policy requirement which states that for all light generating development proposals that may have an adverse impact on residential developments, amenity, wildlife, biodiversity and highway safety will be refused is not positively prepared and goes substantially further than is in the NPPF. Adverse impact is also not defined, and is currently a vague statement with no means of understanding how it is judged consistently. This aspect of the policy is proposed to be removed, as this can be adequately guided via national guidance and through the development management process

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

Draft Policy E4: Environmental Protection - comment ( see pages 20-22 for modifications)

2.125. The following changes to the policy are proposed, in addition to adding mitigation measures as mentioned above:

1) The Council will seek to protect and improve the Borough's air quality and work towards meeting the relevant national Guidelines by ensuring all development proposals prevent further deterioration of existing poor air quality or provide adequate mitigation.

This policy seeks to minimise the adverse impact from light pollution on the environment. It promotes the use of measures to minimise the adverse impact of lighting on surrounding areas. Applicants developing proposals for lighting will be required to assess the impact of the lighting scheme and demonstrate there are no unacceptable adverse impacts. The Council will require developments that may result in light pollution to incorporate appropriate design and energy saving measures in order to minimise the potential for light pollution. The Council will require a lighting impact assessment to accompany an application for development proposals that may cause unacceptable light pollution for residents, businesses or the environment.

2.126. Concerning contamination, the NPPF (Paragraph 120) mentions that substantial weight should be given to the value of supporting appropriate opportunities to remediate contaminated land. It should be acknowledged that whilst mitigating contamination is important, planning policies can provide incentive for land to be remediated and improved through the development process. Proposals that significantly improve ground conditions should be looked upon favourably. IV, therefore, consider that Draft Policy E4 should make this explicit and suggest the following paragraph is added after 8):

9) SBC will look favourably upon development proposals which improve ground conditions affected by contamination.

**Question 6:** You can upload any modifications below.

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Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To help Spelthorne Borough Council produce a sound Plan and set out Inspired Village's case in terms of the necessary modifications to the Plan in order to achieve this.



<b>Respondent: Inspired Villages Ltd (43043713)</b>
<b>Organisation:</b>

<b>Response ID: 1128012</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
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<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Also selected - Not justified, Not effective, Not consistent with national policy Please see attached representation. In summary, the crux of the objections are as follows: <ul style="list-style-type: none"> <li>▪ Level of housing proposed (Standard Method) does not allow for contingency and is therefore not robust or positively prepared;</li> <li>▪ Lack of recent delivery, 5YHLS, unmet need in Elmbridge and lack of contingency warrant a higher housing requirement;</li> <li>▪ Level of windfall sites anticipated is unachievable and speculative, most sites need to be formally allocated to be sure the level of housing proposed is achievable. This is especially the case when such a large percentage of sites are already allocated within the urban area, and yet Green Belt release was still needed;</li> <li>▪ Green Belt Assessment is flawed due to it not being fine-grain, and no exceptional circumstances report published;</li> <li>▪ Further sites should therefore be allocated to account for excessive windfall provision and to allow contingency;</li> <li>▪ No C2 / older persons housing is allocated despite a clear need;</li> </ul>

▪ Alongside the provision of further evidence in the form of an update to the Green Belt Review and production of an Exceptional Circumstances report, Land at Vicarage Road should be allocated in Policy ST2 to help overcome these concerns.  
Please see Section 3 of supporting report

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

See attached representation. In summary, IV consider the main changes need to be made to make it sound:

- Greater number of sites allocated, including allocation and monitoring of specific C2 units;
- Update to the evidence base documents to address errors and incorrect discounting, including to the Green Belt Review to review smaller parcels of land such as Land at Vicarage Road;
- Production of an Exceptional Circumstances Report;
- Less reliance on speculative windfall sites replaced with a mixture of housing allocations; and
- Need for further Green Belt release to accommodate for the objectively assessed need (including Land at Vicarage Road) to ensure the plan is positively prepared and ultimately sound in accordance with NPPF paragraph 35;

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To help Spelthorne Borough Council produce a sound Plan and set out Inspired Village's case in terms of the necessary modifications to the Plan in order to achieve this.



<b>Respondent: Inspired Villages Ltd (43043713)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128016</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy EC1: Meeting Employment Needs	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>IV, therefore, support this policy.</p> <p>It is important to note that an Integrated Retirement Community (IRC), as proposed on the Vicarage Road Site by IV, creates up to 40 jobs per village in a range of roles, with additional roles being created during construction. This will help meet the predicted future growth of the Borough and meeting local employment needs.</p> <p>IV also welcome the need to incorporate sustainability measures into design and construction, as proposed within EC1.</p>	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	
<b>Question 6:</b> You can upload any modifications below.	
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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Inspired Villages Ltd (43043713)</b>
<b>Organisation:</b>

<b>Response ID: 1127910</b>
<b>Policy / Evidence Base / Part of Plan: Policy EC4: Leisure and Culture</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Also selected: Not justified, Not effective, Not consistent with national policy Draft Policy EC4: Leisure and Culture - support (full rep attached) 2.134. IV welcome SBC's acknowledgement that all proposals, not those just specific to leisure purposes can contribute to delivering a high quality and diverse range of leisure and visitor experiences. 2.135. IRC's can contribute to draft Policy EC4 to this effect. Health and well-being is at the heart of IV's operation and proposed IRC at Land at Vicarage Road would include a fully-equipped wellness centre, with spa, gym and treatment rooms. According to a study by the Aston Research Centre in 2015, each person living in a home for later living enjoys a reduced risk of health challenges, contributing to savings to the NHS and social care services of approximately £3,500 per year. 2.136. The facility would be available to eligible residents on a membership basis within the community. 2.137. IV, therefore, welcome and support this policy. (page 22 of attached doc)

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To help Spelthorne Borough Council produce a sound Plan and set out Inspired Village's case in terms of the necessary modifications to the Plan in order to achieve this.

<b>Respondent: Inspired Villages Ltd (43043713)</b>
<b>Organisation:</b>

<b>Response ID: 1128001</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ID1: Infrastructure and Delivery
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Also selected: Not justified, Not effective, Not consistent with national policy Draft Policy ID1: Infrastructure and Delivery- support IV supports the aim of this policy to provide necessary infrastructure identified within the Borough’s Infrastructure Delivery Plan (IDP). The provision of an IRC at Vicarage Road can go some way to meeting some of the requirements listed in the IDP, notably: <ul style="list-style-type: none"> <li>▪ Health – IV is exploring the possibility of having on-site healthcare provision, which could contribute to meeting the existing and increasing healthcare need in the Borough;</li> <li>▪ Community – An IRC will include spaces for hire by the local community such as function rooms and meeting rooms which will help meet the need for a provision of good quality community facilities.</li> <li>▪ Green Infrastructure – Any Proposal at Vicarage Road will include a large provision of publicly accessible open space for all. Currently, the land is not accessible to the public and this will represent an improvement over and above what is currently on site.</li> </ul>



▪ Indoor Leisure Facilities – As mentioned above, the health and well-being centre will take pressure of existing leisure facilities in the Borough and provide another choice and option for local residents.

2.138. IV, therefore, support this policy and contend that an IRC will very much meet the aims and requirements of draft Policy ID1.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To help Spelthorne Borough Council produce a sound Plan and set out Inspired Village's case in terms of the necessary modifications to the Plan in order to achieve this.

<b>Respondent: Inspired Villages Ltd (43043713)</b>	
<b>Organisation:</b>	
<b>Response ID: 1127963</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Evidence base - Green Belt Assessment	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: Yes
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: yes	Additional Comments: yes
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<ul style="list-style-type: none"> <li>• “infrastructure provision is a key element in the delivery of a Local Plan”</li> </ul>	
<b>Question 6:</b> You can upload any modifications below.	
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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Yes - To help Spelthorne Borough Council produce a sound Plan and set out Inspired Village's case in terms of the necessary modifications to the Plan in order to achieve this.

<b>Respondent: Inspired Villages Ltd (43043713)</b>	
<b>Organisation:</b>	
<b>Response ID: 1127970</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Evidence base - Housing Trajectory/5YLS	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: yes	Additional Comments: yes
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: no	Additional Comments: no
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: yes	Additional Comments: yes
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<ul style="list-style-type: none"> <li>• “The Council is required to identify the infrastructure needed to support the development proposed over the next 15 years. This is done through the Infrastructure Delivery Plan (IDP).”</li> </ul>	
<b>Question 6:</b> You can upload any modifications below.	
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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Yes - To help Spelthorne Borough Council produce a sound Plan and set out Inspired Village's case in terms of the necessary modifications to the Plan in order to achieve this.

<b>Respondent: Inspired Villages Ltd (43043713)</b>	
<b>Organisation:</b>	
<b>Response ID: 1127971</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Evidence base - Housing Trajectory/5YLS	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: yes	Additional Comments: yes
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: no	Additional Comments: no
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: yes	Additional Comments: yes
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<ul style="list-style-type: none"> <li>• “The IDP outlines any potential gaps in provision and identifies what new infrastructure is required to mitigate some of the potential effects of the levels of development being proposed. This, together with the policies[sic] in the Plan, sets out how the needs of the Borough will be met over the plan period.”</li> </ul>	
<b>Question 6:</b> You can upload any modifications below.	
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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Yes - To help Spelthorne Borough Council produce a sound Plan and set out Inspired Village's case in terms of the necessary modifications to the Plan in order to achieve this.

<b>Respondent: Inspired Villages Ltd (43043713)</b>	
<b>Organisation:</b>	
<b>Response ID: 1127972</b>	
<b>Policy / Evidence Base / Part of Plan: Duty to Cooperate</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: yes	Additional Comments: yes
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: NO Not Positively Prepared, Not Justified, Not Effective, Not Consistent with National Policy	Additional Comments: NO Not Positively Prepared, Not Justified, Not Effective, Not Consistent with National Policy
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: YES	Additional Comments: YES
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Duty to Cooperate (May 2022) (partly reviewed under housing section) (Page 24 of attached document) 3.1. Duty to Cooperate has been touched on under the housing section of this representation. Firstly, there is no evidence that SBC has proactively tried to accommodate any unmet need from Elmbridge, other than to urge 'Elmbridge to consider other local plan strategies'. Despite this, it had become clear since March 2022 that Elmbridge were not going to be putting forward a plan that met its housing target in full. 3.2. After this time, SBC should have formally explored and documented any attempt to accommodate a proportion of this unmet need. This is outlined in the PPG Paragraph 61-012020190315.	



3.3. IV considers that more work should have been done in the Regulation 18 and stage between EBC publishing their emerging Local Plan and SBC publishing it's, to positively see if this could be accommodated. Yet, from the wording on page 10 of the Duty to Cooperate (May 2022), other than urging EBC to allocate more sites, nothing else has been looked at.

3.4. Whilst the Duty to Cooperate Report (May 2022) which is submitted as part of the evidence base is useful to understand what cooperation has been happening, it does not constitute a Statement of Common Ground (SOCG). This is elaborated in paragraph 2.14 of the report, in which SBC state: "Spelthorne Borough Council is in the process of preparing a statement of common ground outlining its cooperation with strategic bodies. This will be available prior to the submission of the Local Plan."

3.5. The PPG makes clear when LPA's should be preparing SOCGs in 61-020-20190315. Of particular note, is the need for 'statements to be prepared and maintained on an ongoing basis' and 'SOCGs should be available by the time LPAs publish their draft plan'.

3.6. Despite this, no up-to-date SOCGs are available, highlighting a potential lack of cooperation between SBCs and neighbouring authorities and groups. The latest SOCG with Runnymede and EBC was in 2018, at a very early stage in plan development.

3.7. IV considers the lack of recent and up-to-date SOCGs available at this stage of the plan process to be a major flaw, and does not provide evidence to understand how substantive matters of cooperation have been addressed.

Green Belt Assessment

3.8. IV has already touched upon it's concerns with the ARUP Green Belt Review / Assessment above. This has been reviewed at length. In summary, IV considers the way land was assessed was inconsistent, with some parcels being sub-divided and others assessed as part of a large parcel. This skewed results and meant that potentially suitable sites were missed.

3.9. IV suggest that relying solely on the results of this report create a flawed outcome of the most suitable sites for Green Belt release and considers that a finer grain approach is necessary in order to holistically assess the Borough's Green Belt.

3.10. IV, as mentioned above, also strongly contend that an Exceptional Circumstances Report should have been published, as no assessment of how Exceptional Circumstances are evident as required by NPPF Paragraph 141 has been done. Savills' assessment of Exceptional Circumstance is given for Land East of Vicarage Road in Section 2.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: YES - To help Spelthorne Borough Council produce a sound Plan and set out Inspired Village's case in terms of the necessary modifications to the Plan in order to achieve this.

<b>Respondent: Inspired Villages Ltd (43043713)</b>	
<b>Organisation:</b>	
<b>Response ID: 1127973</b>	
<b>Policy / Evidence Base / Part of Plan: Housing Trajectory/5YLS</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: YES	Additional Comments: YES
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: NO Not Positively Prepared, Not Justified, Not Effective, Not Consistent with National Policy	Additional Comments: NO Not Positively Prepared, Not Justified, Not Effective, Not Consistent with National Policy
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: YES	Additional Comments: YES
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Local Plan Housing Trajectory (June 2022) 3.11. IV only seeks to make a small comment on the Housing Trajectory 2022. Firstly, IV questions the high level of change of use completions in 2022 – 2025. Not only is it substantially more than the past three years, the office – residential permitted development rights were reformed in 2021, making it more challenging to convert large premises. This feels overly optimistic. 3.12. SBC will be relying on windfall urban area sites, which are often (through land ownership, remediation and cost implications) not consistent in coming forward.	

3.13. A way of remediating against this is to allocate a greater number of sites as contingency, and have a greater number of Green Belt sites coming forward later in the plan period. Currently, only 132 dwellings out of 892 (15%) Green Belt sites will come forward between years 6-15 of the Plan Period. This causes concern that SBC may struggle to demonstrate a five-year housing land supply towards the end of the plan period, as SBC will also exclusively be relying on windfall and urban area sites.

Draft Statement of Five Year Housing Supply 2021

3.14. Annex 2 of the NPPF defines a deliverable site when assessing sites which can contribute to the 5 year Housing Land Supply (5YHLS). In essence, this should be a site which has detailed planning permission. Those sites which have been allocated, have outline planning permission, or on a brownfield register can only be considered deliverable where there is clear evidence that housing completions will begin on site within 5 years.

3.15. The PPG (paragraph 68-007-20190722) states occasions which might equate to this clear evidence, such as work starting on a reserved matters application or progress made towards submission of a detailed application. 3.16. Yet, in Table B, SBC count all large sites identified in the SLAA as being included within this 5YHLS – despite no planning permission being granted and no sub-assessment of how these sites will be able to delivered.

3.17. When assessing these sites in Table E of the document, many of these sites only have 'land owner availability (no outstanding planning application)' listed as the reason for why it is seen to contribute to the Five Year Housing Land Supply. As mentioned in the PPG, no further detail is given such as:

- Any progress made towards submission of an application;
- Whether a developer is involved with the site;
- No information on site viability or any assessment work.

3.18. In light of this information not being available, IV consider that a large proportion of the 1,658 sites listed in the supply calculation are not deliverable when assessed against Annex 2 of the NPPF or the PPG. Unless further detail is given on why they are deliverable, they should be removed.

3.19. If all these sites are removed from the 5YHLS, then SBC land supply would be 2.14 years.

3.20. The result being that SBC should urgently find a greater number of allocated sites to allow for greater contingency and avoid relying so heavily on windfall sites to come forward.

3.21. There is also no breakdown in the Draft Five Year Housing Land Supply Statement of the breakdown of housing provided for older people. This is required in PPG 68-035-20190722, whereby LPAs should count this as part of their housing supply. By doing this, it will help keep track of how SBC are meeting local need.

See pages 25-26 of attached document

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: YES - To help Spelthorne Borough Council produce a sound Plan and set out Inspired Village's case in terms of the necessary modifications to the Plan in order to achieve this.

<b>Respondent: Inspired Villages Ltd (43043713)</b>	
<b>Organisation:</b>	
<b>Response ID: 1127974</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Evidence base - SHMA	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: YES	Additional Comments: YES
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: NO Not Positively Prepared, Not Justified, Not Effective, Not Consistent with National Policy	Additional Comments: NO Not Positively Prepared, Not Justified, Not Effective, Not Consistent with National Policy
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: YES	Additional Comments: YES
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
See page 26 of attached document for tables Strategic Land Availability Assessment (SLAA) (2021 Update) 3.22. As has been discussed at length in this representation, IV comment that Land at Vicarage Road should have been assessed on a more fine grain basis in the Green Belt assessment, rather than together with and Land East of Groveley Road. 3.23. The Spelthorne Stage 2 GBA includes the site as part of a much wider parcel (16-a) and as a result judges it to be an area of 'strong' green belt. This is reflected in the SLAA site SC1/010.	

3.24. IV consider that if the site is considered as a separate sub-area, in the same way that 16-b and 16-c are, such as 16-aa and using the same methodology, the site is an area of 'moderate' Green Belt. Any development on the site would not result in any sprawl beyond the existing northern extent of Sunbury-on-Thames (Purpose 1); would still allow a significant gap to be maintained between Sunbury-on-Thames and Feltham (Purpose 3) and, due to its urban fringe character, would not result in significant encroachment into the countryside.

3.25. As such, IV considers that based on the work undertaken to date on a planning application, and promotion of the Site under a narrower boundary, Land at Vicarage Road should be included as a SLAA site as below. This follows the detailed Site assessment done in Section 2 of this report when assessing the Site against the Green Belt.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: YES - To help Spelthorne Borough Council produce a sound Plan and set out Inspired Village's case in terms of the necessary modifications to the Plan in order to achieve this.

<b>Respondent: Inspired Villages Ltd (43043713)</b>	
<b>Organisation:</b>	
<b>Response ID: 1127976</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Evidence base - SLAA	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: YES	Additional Comments: YES
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: NO Not Positively Prepared, Not Justified, Not Effective, Not Consistent with National Policy	Additional Comments: NO Not Positively Prepared, Not Justified, Not Effective, Not Consistent with National Policy
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: YES	Additional Comments: YES
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
See page 27 of attached document Spelthorne Strategic Housing Market Assessment (October 2019, November 2015) ) (Reviewed as part of Housing Supply) 3.26. The SHMAA 2019 / 2015 has already been reviewed within this representation. IV welcome that SBC recognise there is an acute need for specialist housing in the Borough, yet as mentioned, consider that this should correlate with appropriate allocations in the emerging Local Plan. 3.27. As mentioned in Section 2, IV has strong objections to the SHMA methodology, as no distinguishment has been made between market/affordable/extra care or any other tenures, instead simply setting out a level of need for C2 housing.	



3.28. In the Contact Consulting Needs Assessment (Appendix 2) IV has instructed a Needs Assessment by Contact Consulting which makes this distinction. This assessment shows an additional +417 units of market extra care are needed by 2035 within the Borough.

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Yes/No/Not answered: Yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: YES - To help Spelthorne Borough Council produce a sound Plan and set out Inspired Village's case in terms of the necessary modifications to the Plan in order to achieve this.

<b>Respondent: Inspired Villages Ltd (43043713)</b>
<b>Organisation:</b>

<b>Response ID: 1127996</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Sustainability Appraisal; Officer Site Assessments (Discounted Sites/Alternative Sites)	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: Yes
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: YES - To help Spelthorne Borough Council produce a sound Plan and set out Inspired Village's case in terms of the necessary modifications to the Plan in order to achieve this.	Additional Comments: YES - To help Spelthorne Borough Council produce a sound Plan and set out Inspired Village's case in terms of the necessary modifications to the Plan in order to achieve this.
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: Yes
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
See pages 27 - 32 of attached document for modifications and further suggestions/related concerns. Emerging Local Plan Site Allocations/Discounted Alternative Site Allocations (May 2022) – Officer Site Assessment and Sustainability Appraisal 3.29. IV wishes to comment on the Officer assessment given of the Site in the Discounted Site Allocations / Officer Site Assessment and Sustainability Appraisal. As there is significant overlap between the two documents, they will be discussed under one heading.	

3.30. In summary, IV consider the assessment given in both documents to not represent a fair characterisation and is overly negative. Alternative wording and corrections are suggested in red:

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Yes/No/Not answered: Yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: YES - To help Spelthorne Borough Council produce a sound Plan and set out Inspired Village's case in terms of the necessary modifications to the Plan in order to achieve this.

<b>Respondent: Inspired Villages Ltd (43043713)</b>	
<b>Organisation:</b>	
<b>Response ID: 1127998</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Evidence Base - Green Belt Assessment	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: yes	Additional Comments: yes
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: yes	Additional Comments: yes
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
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No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>Draft Policy SP4: Green Belt - comment</p> <p>2.93. IV understand the need and willingness for SBC to have a specific policy on Green Belt, given the large area of Green Belt within the authority boundary. Yet, currently the policy does not accurately reflect national policy, and wording can be amended as such. Suggested wording is below – which reflects NPPF Chapter 13. An additional paragraph is suggested to reflect Very Special Circumstances:</p> <p>The Green Belt boundary is shown on the Policies Map. In order to uphold the five purposes as defined in NPPF Paragraph 138. Inappropriate development will should not be approved unless except in very special circumstances.</p> <p>Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. Very Special Circumstances are essentially the benefits that arise from the proposals that</p>	

can, collectively, be balanced against the identified harm to the Green Belt and other harm. There is no definition of what might or might not constitute VSC, and each proposal should be judged on their own merits and is a matter of judgement.

2.94. IV also would suggest wording is amended in the supporting justification to also better reflect national policy, particularly Paragraph 2 of the NPPF whereby planning policies should be read as a whole.

5.21 - Proposals within the Green Belt will also be expected to comply with all other Local Plan policies when taken as a whole, particularly those that cover design, amenity, landscape, biodiversity and flooding.

2.95. This wording more accurately reflects national policy and ensures the policy is positively prepared.  
see attached document for full tracked changes/modifications on page 16

**Question 6:** You can upload any modifications below.

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Yes/No/Not answered: Yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: yes - To help Spelthorne Borough Council produce a sound Plan and set out Inspired Village's case in terms of the necessary modifications to the Plan in order to achieve this.

<b>Respondent: Councillor Naz Islam (19531745)</b>
<b>Organisation: Spelthorne BC Councillor</b>

<b>Response ID: 1117924</b>
<b>Policy / Evidence Base / Part of Plan: Policy E5: Open Space and Recreation</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
We note that the Council Local Plan Team has included the following sites for designation as Local Green Spaces and to receive the formal planning protections that such designation affords them:- 1. The open Space at the Brooklands Development off Church Road, Ashford; 2. Scott Freeman Green on Stanwell Road, Ashford 3. The recreation land at the Wickets, Ashford. We agree that these locations are critical to be protected, and are highly valued by local residents and fully support these designations. I would also like to take the opportunity to thank you for all your hard work on the local plan, this is appreciated by the residents of Spelthorne. Furthermore:

Please find the attached detailed submission for Local Green Space, the submission contains location map, photo, reason and contact details.  
This location is critical to be protected, and is highly valued by local residents.  
I would also like to take the opportunity to thank you for all your hard work on the local plan, this is appreciated by the residents of Spelthorne.

**Question 6:** You can upload any modifications below.

LDF Village AshT 2209p NI\_OR.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/586989/PDF/-/LDF%20Village%20AshT%202209p%20NI%5FOR%2Epdf>

Gething, Islam, Ramlakhan - Opposite St. Hildas Church on Stanwell Rd.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619730/PDF/-/Gething%5F%20Islam%5F%20Ramlakhan%20%2D%20Opposite%20St%2E%20Hildas%20Church%20on%20Stanwell%20Rd%2Epdf>

Gething, Islam, Ramlakhan - St Hildas Churchyard.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619731/PDF/-/Gething%5F%20Islam%5F%20Ramlakhan%20%2D%20St%20Hildas%20Churchyard%2Epdf>

LDF Ashford Close AshT 2209p NI\_NG\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619732/PDF/-/LDF%20Ashford%20Close%20AshT%202209p%20NI%5FNG%5FRedacted%2Epdf>

LDF Echleforde Park AshT 2209p NI\_NG\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619733/PDF/-/LDF%20Echleforde%20Park%20AshT%202209p%20NI%5FNG%5FRedacted%2Epdf>

LDF Fairholme Road AshT 2209p NI\_MR\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619734/PDF/-/LDF%20Fairholme%20Road%20AshT%202209p%20NI%5FMR%5FRedacted%2Epdf>

Gething, Islam, Ramlakhan - Land either side of entrance to West Close.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619735/PDF/-/Gething%5F%20Islam%5F%20Ramlakhan%20%2D%20Land%20either%20side%20of%20entrance%20to%20West%20Close%2Epdf>

Gething, Islam, Ramlakhan - Land on Village Way.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619736/PDF/-/Gething%5F%20Islam%5F%20Ramlakhan%20%2D%20Land%20on%20Village%20Way%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Miss Julia Jaeger (25815105)</b>	
<b>Organisation:</b>	
<b>Response ID: 1125651</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
I am sorry to submit my comments at the last minute, but I have been mulling over the proposals for awhile. There is much to commend in the plan, including:-	
<ul style="list-style-type: none"> <li>* Varied and affordable housing</li> <li>* A response to the climate emergency</li> <li>* A new 6<sup>th</sup> Form college (long overdue!)</li> <li>* Improved key infrastructure</li> <li>* Hopes to enhance the Borough , Including a new vision</li> </ul>	

This we should all be grateful for. I have only lived here for just over 20 years, but feel the town centre has declined rapidly. I only visit less than once a month now as there is nothing much to go to there. If I need clothes, I shop in Kingston or London.

So what I would like to see included is a more compact, vibrant town centre with shops you can use. Not just chains, vapes and coffee shops.

In relation to housing, I appreciate you are up against serious targets set by nameless government officials. The ideas of tower blocks is very off putting. I fear they will create wind tunnels as well as shadows in the town centre. So please can the plans limit to an acceptable low height. Woking looks more like Dallas and we shouldn't follow that line. Secondly, is there anyway they can be limited to be sold as first homes to residents only and not as investments to foreign buyers? This is widely reported as happening elsewhere and defeats the government's objective of homes for all.

No green belt should be surrendered for any building regardless. Once its gone, its gone. I live in Laleham and the new studios for Shepperton are such a blot on the landscape. I feel so sorry for friends who live on the studios estate whose homes are now unsaleable! We should do as much as we can to preserve the countryside, otherwise the town just deteriorates into bricks and mortar. There must be better ways of creating new homes and schools without eating up the grounds.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Mark Frederick James (40359969)</b>
<b>Organisation:</b>

<b>Response ID: 1124075</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
I would like register my disapproval of the proposed mass housing development plans for Staines / Spelthorne. My next door neighbour and councillor Jo Sexton has voted against this work as the existing infrastructure / road network is already insufficient as seen daily. I agree with her stand point and would like to be advised of what steps we can take to stop this unviable work. I believe the councillors who voted against this work all live locally and the councillors who voted for it live elsewhere. Poor system open to abuse. Please acknowledge receipt of this correspondence and keep me informed of a right to vote against these works
<b>Question 6: You can upload any modifications below.</b>
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent:</b> Sue Janota (19592417)
<b>Organisation:</b> Surrey County Council

<b>Response ID:</b> 1125942
<b>Policy / Evidence Base / Part of Plan:</b> Policies Map
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
<p>SCC is committed to growing a sustainable economy, enabling a greener future, empowering communities, tackling health inequality and ensuring economic development/planned growth are underpinned by the timely delivery of supporting infrastructure. This is reflected in current partnership working with boroughs and districts on Surrey's 2050 Place Ambition and through the Surrey Infrastructure Plan.</p> <p>The county council acknowledges that balancing the need for housing and employment growth and the need to protect the Green Belt is a matter to be decided locally through the Local Plan. Key issues for the county council are the implications of the Pre-submission Local Plan's policies and proposals for infrastructure for which the council is the provider and the council's statutory responsibilities in relation to minerals and waste planning, highways and transport, education, biodiversity and as the lead local flood authority for Surrey.</p> <p>Policies map:</p>

There appear to be a number of key omissions from the Interactive Policies Map for the Local Plan (<https://www.planvu.co.uk/spelthorne/>). The layers for 'Waste and Minerals' do not include the allocated SMP sites, only the allocated SWLP sites. It is noted in particular that Watersplash Farm (Preferred Area L) and King George VI Reservoir (Preferred Area H) are not included. Watersplash Farm is also not identified on the 'Current Waste and Minerals Sites' layer, despite planning permission (ref. SP12/01487) having been granted in March 2020 for the working of the land. Land west of Queen Mary Reservoir is also not identified on the 'Current Waste and Minerals Sites' layer. However, restoration is ongoing for the majority of the site, and the processing part of the site is still in use and will remain so until Manor Farm is completed.  
See related document attached

**Question 6:** You can upload any modifications below.

Spelthorne Reg 19 response September 2022 Final[301643] SCC SJ\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618838/PDF/->

[/Spelthorne%20Reg%2019%20response%20September%202022%20Final%5F301643%5F%20SCC%20SJ%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618838/PDF/-/Spelthorne%20Reg%2019%20response%20September%202022%20Final%5F301643%5F%20SCC%20SJ%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent:</b> Sue Janota (19592417)
<b>Organisation:</b> Surrey County Council

<b>Response ID:</b> 1125941
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
<p>SCC is committed to growing a sustainable economy, enabling a greener future, empowering communities, tackling health inequality and ensuring economic development/planned growth are underpinned by the timely delivery of supporting infrastructure. This is reflected in current partnership working with boroughs and districts on Surrey's 2050 Place Ambition and through the Surrey Infrastructure Plan.</p> <p>The county council acknowledges that balancing the need for housing and employment growth and the need to protect the Green Belt is a matter to be decided locally through the Local Plan. Key issues for the county council are the implications of the Pre-submission Local Plan's policies and proposals for infrastructure for which the council is the provider and the council's statutory responsibilities in relation to minerals and waste planning, highways and transport, education, biodiversity and as the lead local flood authority for Surrey.</p> <p>Allocations:</p>

SC1/004 Sunbury Fire Station, Staines Road West

This site was included in the 'Preferred Options' for the Spelthorne Local Plan. In July 2022 the SCC Cabinet approved the allocation of capital funding for the development of detailed design and construction of the Sunbury Hub which will redevelop the former Sunbury Fire Station. The proposed redevelopment is for a new integrated five-storey, multi-service hub which will bring together key local services and include 12 self-contained Supported Independent Living apartments. This development will support the relocation of some local SCC services, possibly enabling redevelopment opportunities.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent:</b> Sue Janota (19592417)
<b>Organisation:</b> Surrey County Council

<b>Response ID:</b> 1119844
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Climate change We welcome the support and encouragement for net-zero building in policy PS1. However, while this will reduce emissions, there is scope to go further through setting higher targets which would get closer to or achieve net-zero. Reference to the June 2022 update to part L of the Building Regulations should be made at point 5 of the policy. In relation to point 2 and the avoidance of internal overheating, it may be helpful for major residential applications to require TM59 analysis to assess risk and for hotter weather scenarios consistent with predicted more extreme weather patterns in Surrey. We support point 4 of the policy which supports and encourages proposals for renewable, low and zero carbon and decentralised energy. For major buildings, consideration should be given to the need for sufficient plant room to contribute and connect to any larger district heating system in future.

We suggest that policy PS1 also includes wording that:

- a) expects proposals for buildings to use low carbon fuels (biofuel and direct electricity at scale; heat pumps, solar panels and micro-turbines at an individual dwelling scale) unless it is not practicable and
  - b) requires developers of major new residential developments to make the development zero carbon, preferably on-site or, if that is not practicable, through a carbon offset fund.
- see attached document for anything further.

**Question 6:** You can upload any modifications below.

Spelthorne Reg 19 response September 2022 Final[301643] SCC SJ\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618846/PDF/->

[/Spelthorne%20Reg%2019%20response%20September%202022%20Final%5F301643%5F%20SCC%20SJ%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618846/PDF/-/Spelthorne%20Reg%2019%20response%20September%202022%20Final%5F301643%5F%20SCC%20SJ%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent:</b> Sue Janota (19592417)
<b>Organisation:</b> Surrey County Council

<b>Response ID:</b> 1119850
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS3: Heritage, Conservation and Landscape
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Heritage We welcome the changes made to policy PS3 since the Preferred Options version of the Local Plan and are pleased to note the retention of the 0.4ha site area threshold for requiring an archaeological assessment, as this is an important consideration in promoting a “proactive” policy with regards to archaeology.
<b>Question 6:</b> You can upload any modifications below.
Spelthorne Reg 19 response September 2022 Final[301643] SCC SJ_Redacted.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618831/PDF/-/Spelthorne%20Reg%2019%20response%20September%202022%20Final%5F301643%5F%20SCC%20SJ%5FRedacted%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618831/PDF/-/Spelthorne%20Reg%2019%20response%20September%202022%20Final%5F301643%5F%20SCC%20SJ%5FRedacted%2Epdf</a>



**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent:</b> Sue Janota (19592417)
<b>Organisation:</b> Surrey County Council

<b>Response ID:</b> 1119893
<b>Policy / Evidence Base / Part of Plan:</b> Policy SP1: Staines-upon-Thames
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Economy We agree with the focus to retain, create and develop local businesses in particular in town and local centres. The configuration of the strategic employment areas around key clusters and anchors is cohesive and protection of identified employment land is supported. We also welcome the retail approach proposed in the plan with regards to proposals in Ashford, Shepperton and Sunbury Cross, and the enabling and facilitation of development which improves the viability and vitality of shopping parades within the Borough to support local communities. To realise this objective, it will be particularly important to work with employers and partners, including the county council, to support local skill provision, ensure retention, and bring about sustainable inward investment.
Education

Post 16 education The number of pupils in Year 11 attending schools in Spelthorne is expected to rise by 190 (17%) from 2022 to the peak in 2028-29. Neighbouring boroughs are expecting similar trends. This means that the demand for post 16 places will increase as the higher numbers of pupils move up from year 11. SCC is supportive of a site being allocated at Land East of Upper Halliford Road, Nursery Road, Upper Halliford (site HS1/012b) as a consideration for sixth form provision in Spelthorne. The site-specific requirements on page 147 in relation to site HS1/012 state that 'Surrey County Council as the education provider support additional sixth form development, subject to the supply of specific types of provision. This is to be agreed with the Council as part of the application process'. This should be included on pages 180/181 in relation to site HS1/012b and deleted from page 147. Further consultation will be required to identify the type of provision required to meet the needs of the growing number of pupils. Special Educational Need and Disability (SEND) provision The county council has identified a long-term sufficiency gap for additional specialist school places in Spelthorne at primary age, secondary age and post 16. The June 2022 Infrastructure Delivery Plan (IDP) highlights this need and references Surrey's SEND Capital Programme. To clarify, there is a residual funding gap countywide to deliver SEND places required to meet projected demand. Four projects have now been identified which will be delivered between 2023-2026 and will provide 87 SEN unit places in existing mainstream primary and secondary schools in Spelthorne. Infrastructure funding for education improvements We note that the IDP part 2 uses a per development S106 assumption for both the police and healthcare but that a similar approach is not used for any infrastructure for which SCC has a responsibility. This appears something of a discrepancy in approach. In addition, it could be clarified that reference to potential Education contributions in the IDP part 2 relates to all phases of Education (0-19) and Special Educational Needs.

#### Libraries

Libraries in Spelthorne are currently undersized for the populations they serve, and additional housing will further impact on the need for more space to deliver essential services. Libraries use the Department for Digital, Culture, Media and Sport (DCMS) standard of 30m<sup>2</sup> net of public library space per 1,000 population to determine space requirements for each area. Care needs to be given to maintaining these standards in the development of the library estate and the county council welcomes opportunities to work jointly with Spelthorne to ensure libraries in the borough deliver a modern library service.

See attached documents for further in depth rep.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent:</b> Sue Janota (19592417)
<b>Organisation:</b> Surrey County Council

<b>Response ID:</b> 1119896
<b>Policy / Evidence Base / Part of Plan:</b> Policy SP3: Stanwell and Stanwell Moor
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
There are a number of site allocations close to the boundary with the LB Hounslow and Policies SP3 and SP7 make reference to sustainable travel improvements. It will be important to ensure alignment of active and sustainable travel improvements across the boundary with LB Hounslow. Please see attached document for in depth rep for related info - may be found on page 7.
<b>Question 6:</b> You can upload any modifications below.
Spelthorne Reg 19 response September 2022 Final[301643] SCC SJ_Redacted.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618848/PDF/-/Spelthorne%20Reg%2019%20response%20September%202022%20Final%5F301643%5F%20SCC%20SJ%5FRedacted%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618848/PDF/-/Spelthorne%20Reg%2019%20response%20September%202022%20Final%5F301643%5F%20SCC%20SJ%5FRedacted%2Epdf</a>



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<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
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Yes/No/Not answered: No Response
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If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response
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<b>Respondent:</b> Sue Janota (19592417)
<b>Organisation:</b> Surrey County Council

<b>Response ID:</b> 1119897
<b>Policy / Evidence Base / Part of Plan:</b> Policy SP7: Heathrow Airport
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
There are a number of site allocations close to the boundary with the LB Hounslow and Policies SP3 and SP7 make reference to sustainable travel improvements. It will be important to ensure alignment of active and sustainable travel improvements across the boundary with LB Hounslow. Please see attached document for in depth rep for related info - may be found on page 7.
<b>Question 6:</b> You can upload any modifications below.
Spelthorne Reg 19 response September 2022 Final[301643] SCC SJ_Redacted.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618852/PDF/-/Spelthorne%20Reg%2019%20response%20September%202022%20Final%5F301643%5F%20SCC%20SJ%5FRedacted%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618852/PDF/-/Spelthorne%20Reg%2019%20response%20September%202022%20Final%5F301643%5F%20SCC%20SJ%5FRedacted%2Epdf</a>

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<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
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Yes/No/Not answered: No Response
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If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response
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<b>Respondent:</b> Sue Janota (19592417)
<b>Organisation:</b> Surrey County Council

<b>Response ID:</b> 1119863
<b>Policy / Evidence Base / Part of Plan:</b> Policy E1: Green and Blue Infrastructure
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
We also have the following suggestions for policies E1 and E2: E1: Green and Blue Infrastructure 1. All Development must contribute towards the provision, protection and enhancement of the wider green and blue infrastructure, by supporting ecological functionality (including air, water, soil quality), providing resources for species and/or contributing to habitat connectivity, at a scale commensurate with the proposal. 2. All proposals for major development will be required to provide a high standard of design for green and blue infrastructure in accordance with established, recognisable standards, including the National Design Guide <sup>38</sup> , the Natural England Green Infrastructure Framework <sup>39</sup> and Building with Nature Standards

See attached document

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent:</b> Sue Janota (19592417)
<b>Organisation:</b> Surrey County Council

<b>Response ID:</b> 1119862
<b>Policy / Evidence Base / Part of Plan:</b> Policy E2: Biodiversity
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Biodiversity SCC has been notified, on a provisional basis, that it will be the responsible body for a county wide Local Nature Recovery Strategy (LNRS). The following comments are made in relation to the county’s strategic interest in biodiversity arising from this role. The supporting text of policy E2 should include reference to the nature recovery networks to be proposed in the LNRS for Surrey, which will be developed in 2022 and 2023 and point 7 of policy E2 should include the wording, “Biodiversity measures, must align with and deliver the Surrey Local Nature Recovery Strategy (to be prepared).” We also have the following suggestions for policies E1 and E2:

E2: Biodiversity 5) The Council will seek net gains in biodiversity through creation or expansion, restoration/enhancement of habitats and features to improve the status of priority habitats and species. All development will be expected to provide at least 10% net gain, using the most up-to date Biodiversity metric, appropriate to scale of development.

6) The Council will expect developers to incorporate a variety of means in improving biodiversity within developments including householder extensions including, but not limited to:

- the installation of bee bricks,
- use of bird nest and bat roost boxes or gabions
- incorporation of green roofs and living walls,
- minimise external lighting,
- retain existing trees and hedges and replanting with native species at ratio of 3:1 (see SWT's urban design recommendations, extracted from Urban BOAs report)

7) Development proposals should demonstrate clearly how biodiversity net gain will be achieved and this should be in accordance with the Surrey Local Nature Recovery Strategy (to be prepared) and take account of other national, regional and local biodiversity strategies including any Supplementary Planning Document and/or additional guidance as produced by the Council.

8) Biodiversity net gain should be delivered using the BNG mitigation hierarchy of avoid losses, mitigate and lastly compensate. Where off site compensation is required, this should be within the Borough boundary and should be as close to the development site as possible.

Please attached document.

**Question 6:** You can upload any modifications below.

Spelthorne Reg 19 response September 2022 Final[301643] SCC SJ\_Redacted.pdf

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent:</b> Sue Janota (19592417)
<b>Organisation:</b> Surrey County Council

<b>Response ID:</b> 1119866
<b>Policy / Evidence Base / Part of Plan:</b> Policy E3: Managing Flood Risk
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Flooding To improve consistency in how surface water flood risk is reviewed across the county, we would recommend that the following policy wording is included in policy E3: Managing Flood Risk: All development proposals are required to demonstrate that land drainage will be adequate and that they will not result in an increase in surface water run-off. Sustainable drainage systems are required on all developments, unless proved to be not practicable, and should: a) Ensure surface run-off is managed as close to the source as possible and does not increase flood risk elsewhere; b) Be in accordance with the rainwater disposal hierarchy of Building Regulations Part H3 (3); c) In circumstances where it has been proved that infiltration is impractical, ensure discharge of surface water to watercourse/sewer shall not exceed the following peak rates:



- at pre-development greenfield runoff rates on all new development;
  - as close as reasonably practicable to greenfield run off rates from all other brownfield sites;
- d) Be designed to be multi-functional and incorporate sustainable drainage into landscaping and public realm, including maximising opportunities to establish surface water ponding areas, urban watercourse buffer areas and multi-use flood storage areas in locations of high surface water flood risk and critical drainage areas to improve flood resilience, amenity and biodiversity;
- e) Achieve improvements in water quality through a sustainable drainage system management train;
- f) Be designed with consideration of future maintenance and climate change; and
- g) Make improvements in accordance with the Council's most up to date Infrastructure Delivery Plan.

We have the following additional suggestions on the wording of policy E3:

E3 - Managing Flood Risk To reduce the overall and local risk of flooding and manage water resources:

- 1) Different areas of flood risk Spelthorne Borough are determined by definitions contained within national planning practice guidance and the Council's Strategic Flood Risk Assessment (Level 1).
- 2) To reduce the overall and local flood risk and manage water resources development must be located, designed and laid out to ensure that it is safe, the risk from flooding is minimised (whilst not increasing flooding risk elsewhere) and that residual risks are safely managed.
- 3) New development will be guided to areas of lowest flood risk from all sources of flooding through the application of the sequential test. Where individual sites contain different levels of flood risk, the layout of the site will be expected to minimise flood risk from all sources. The exception test will continue to be applied where national planning policy advises that this is necessary.
- 4) All development proposals are required to demonstrate that land drainage will be adequate and that they will not result in an increase in surface water run-off. The Council will expect incorporating SuDs (Sustainable Drainage Systems) to manage surface water drainage and provide multi-functional benefits in accordance with the NPPF, unless it can be demonstrated that they are not appropriate. Consider adding bullet points a-g here as detailed in our suggested policy wording above.
- 5) Development in Flood Zones 2 and 3a and on a dry island will be permitted provided that:
  - (a) the vulnerability of the proposed use is appropriate for the level of flood risk on the site (see table below);
  - (b) the proposal passes the sequential and exception test (where required) as outlined in the NPPF and guidance;
  - © a site-specific flood risk assessment demonstrates that the development, including (typo/omission including what?) will be safe for its lifetime (taking into account climate change) without increasing flooding elsewhere, and will, where possible, reduce flood risk overall;
  - (d) safe access and egress is demonstrated for residential development of one or more net additional units;
  - (e) the scheme incorporates flood protection, flood resilience and resistance measures appropriate to the character of the area and;
  - (f) applications include appropriate flood warning and evacuation and site drainage systems take account of storm events and flood risk of up to 1 in 100 year event with an appropriate allowance for climate change.

6) applications must be supported by Flood Risk Assessments where appropriate that demonstrate the development will be safe, not increase flood risk elsewhere, and maximise opportunities to reduce flood risk from all sources. 1 in 20 year – Flood Zone 3b (Flood Zone 3b is the area of highest fluvial risk and we would recommend the language in the policy be changed to ‘must’ rather than ‘should’ and ‘are/is’ rather than ‘should be’.)

7) Within the 1 in 20 year (5% AEP) extent; (should this also cover the 1 in 30 surface water flood risk areas as they have a similar level of existing risk?)

(a) the provision of essential infrastructure will be supported but in principle the land must remain undeveloped to maintain flood storage capacity and not impede the flow of flood water.

(b) development vulnerability must be reduced and change of use to a higher vulnerability classification will not be permitted;

© extensions or re-development of buildings may be considered, subject to the following:

i) the footprint of the building is reduced where possible and is not be increased,

ii) finished floor levels are raised where possible;

iii) surface water runoff rates and volumes from the site are reduced;

iv) floodplain storage capacity is increased and space created for flooding to occur by restoring functional floodplain;

v) impedance to floodwater flow is reduced;

vi) flood resistance and resilience measures are incorporated and;

vii) inclusion of measures to ensure development remains safe for users in time of flood.

8) Schemes which deliver a betterment (it would be helpful to explain what is meant by betterment, for example a reduction in flood risk on and off site or just on site) will be supported, subject to consultation with the Environment Agency where required and meeting other policy requirements of the Plan. (Should this comment apply to all sites and not just in 1 in 20 year fluvial extent?)

We would be happy to discuss these comments with you as we consider that this policy misses some opportunities to significantly improve flood risk in the Borough through appropriate and robustly regulated development.

The key evidence documents listed on page 92 includes SCC’s 2014 ‘Local Flood Risk Management Strategy. The strategy was refreshed in 2017.

Please see attached document for further info and deleted texts

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent:</b> Sue Janota (19592417)
<b>Organisation:</b> Surrey County Council

<b>Response ID:</b> 1119895
<b>Policy / Evidence Base / Part of Plan:</b> Policy ID2: Sustainable Transport for New Developments
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Highways and Transport The Pre-submission Local Plan makes no reference to Local Transport Plan 4 (LTP4), although policy ID2 aligns well with LTP4 objectives. The policy does refer to the Spelthorne LCWIP, but we consider that the supporting text referencing both LTP4 and the LCWIP should include the following additional wording: Surrey County Council's 2022 Local Transport Plan 4 sets out county-wide policies on reducing transport emissions in order to help meet the county's commitment to becoming net zero by 2050. One of the primary delivery mechanisms for achieving net zero is the roll out of Local Cycling and Walking Infrastructure Plans (LCWIP). The Spelthorne LCWIP will provide a 10-year plan for the delivery of walking and cycling infrastructure within Spelthorne and seeks to deliver safe, high-quality walking and cycling environments across the borough.

In our response to the Preferred Options consultation, we commented on the public transport interchanges which were referred to in the consultation document. This version of the plan still makes references to public transport interchanges (para 9.13, page 127) and defines these as rail and bus stations within the borough. However, whilst these are interchange facilities, as previously stated, we do not agree that there are any public transport interchanges within Spelthorne. Staines railway station has bus stops directly on its northern frontage and is closest to meeting the definition but is a five minute walk to Staines bus station. The remaining rail stations within Spelthorne all have standalone bus stops.

There are a number of site allocations close to the boundary with the LB Hounslow and Policies SP3 and SP7 make reference to sustainable travel improvements. It will be important to ensure alignment of active and sustainable travel improvements across the boundary with LB Hounslow.

The key evidence documents listed on page 128 of the draft Local Plan, includes SCC's 'Vehicular and Cycle Parking Guidance' (2018). This document has since been updated and superseded by SCC's 'Vehicle, Cycle and Electric Vehicle Parking Guidance for New Development'.

Health Impact Assessment

We note the policy requirement for Health Impact Assessments for major transport schemes. This is welcomed, but we would suggest that there should be a policy requirement for Health Impact Assessments for all major developments. This is an area that our Public Health team is starting to look at and is keen to involve Spelthorne Borough Council as work progresses.

Please see attached document for in depth reps.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Sue Janota (19592417)</b>
<b>Organisation: Surrey County Council</b>

<b>Response ID: 1119921</b>
<b>Policy / Evidence Base / Part of Plan: AS2/006 (Land East of Desford Way)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
AS2/006 (Land East of Desford Way, Ashford) This allocation is approximately 20m from Homers Farm Quarry, which is allocated as a Preferred Area for concreting aggregate by Policy MA2 of the Surrey Minerals Plan PADPD, and benefits from planning permission (Ref. SP/13/00141/SCC) for the extraction of sand and gravel and restoration to agricultural use. It is acknowledged that the proposed allocation is separated from Homers Farm by the A30, which is likely to reduce any potential impacts from the minerals site. However, for clarity the site-specific requirements relevant to proposed allocation AS2/006 should refer to Homers Farm, and any residential development should ensure that there is suitable mitigation provided so that sensitive receptors would not be adversely affected by workings at the minerals site, in accordance with Policy MC6 of the SMP and Paragraph 187 of the NPPF. It is noted that the MWPA were recently

consulted by SBC on a planning application (Ref. PTKW/22/00798/OUT) for the above site and provided comments similar to those set out within this letter. (On page 9 in attached document)

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent:</b> Sue Janota (19592417)
<b>Organisation:</b> Surrey County Council

<b>Response ID:</b> 1119919
<b>Policy / Evidence Base / Part of Plan:</b> HS1/009 (Bugle Nurseries, Upper Halliford Road)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
<p>HS1/009 (Bugle Nurseries, Upper Halliford Road)</p> <p>As previously raised by SCC in its January 2020 response to the ‘Preferred Options’ consultation, site allocation Ref. HS1/009 is within the Waste Consultation Area (WCA) for the Charlton Lane Community Recycling Centre, Waste Transfer Station and Materials Recycling Facility, and near the waste management facility itself. The existing waste management facility is safeguarded in accordance with Policy 7 of the Surrey Waste Local Plan 2020 (SWLP). Accordingly, the site-specific requirements relevant to the proposed allocation should refer to the Charlton Lane facility for clarity, and any residential development should include appropriate mitigation so that sensitive receptors are not adversely affected by the continued operation of the existing facility in accordance with Paragraph 187 of the NPPF.</p> <p>Please attached document for further related topics (page 9)</p>



**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent:</b> Sue Janota (19592417)
<b>Organisation:</b> Surrey County Council

<b>Response ID:</b> 1119840
<b>Policy / Evidence Base / Part of Plan:</b> RL1/011 (Land at Staines and Laleham Sports Club, Worple Road)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
A particular concern relates to site allocation Ref. RL1/011 (Land at Staines and Laleham Sports Club, Worple Road), which is adjacent to the minerals site at Manor Farm. The site description and site-specific requirements set out for the proposed allocation do not mention the adjacent minerals site or considerations relating to its being located in a Minerals Safeguarding Area (MSA) and there is the potential for overlap of mineral extraction at Manor Farm and the proposed delivery timeframe for the site. Accordingly, SCC as the Minerals and Waste Planning Authority (MWPA) does not consider the Presubmission Spelthorne Local Plan 2022 - 2037 to be sound because it would not be effective and is not consistent with national planning policy. In relation to effectiveness, site allocation Ref. RL1/011 may not be able to be delivered within the stated timeframe without conflicting with Policy MC6 of the Surrey Minerals Plan Core Strategy 2011 and Policy MA2 of the Surrey Primary Aggregates Development Plan Document 2011. In respect of consistency, the allocation conflicts with paragraphs 187 and 211 of the National Planning Policy Framework 2021.

We consider that modifications to the wording within the site information table relevant to allocation Ref. RL1/011 are necessary to make the Pre-submission Spelthorne Local Plan 2022 – 2037 sound. These proposed modifications, detailed below, will provide clarity about the location of the allocation within an MSA and adjacent to land at Manor Farm, which benefits from planning permission for mineral extraction. They will also provide certainty as to the need for the design of any development to take account of or otherwise be informed by the approved restoration scheme and long-term management plan for the

Manor Farm site, and a Minerals Resource Assessment. The suggested modifications will ensure that the occupation of any development associated with the allocation by sensitive receptors only takes place once adjacent extraction, landfilling, and engineering operations have been substantially completed thereby negating the risk that non-minerals development would indirectly prejudice approved minerals extraction and restoration operations at the Manor Farm site. (Please see attached document from page 1)

RL1/011 Land at Staines and Laleham Sports Club, Worple Road As set out above, SCC as the MWPA is concerned that the site description and sitespecific requirements set out for the proposed allocation do not mention that it is adjacent to the Manor Farm minerals site and within a Minerals Safeguarding Area (MSA). As mineral extraction has not yet commenced, there is a potential overlap with the proposed delivery timeframe of 2028-2032 for the site allocation and extraction and restoration of Manor Farm. Were residential development to be introduced in the proposed location prior to the completion of minerals site restoration works, it is likely that residents would be subjected to adverse impacts arising from mineral extraction and/or site restoration works which could in turn prejudice continued mineral working or site restoration works. Once the mineral working has been restored, there is also the real potential for the proposed residential development to compromise the nature conservation after-use by way of issues relating to surface water drainage, artificial lighting, trespass, predation by domestic animals, and general land-use conflict over the 25-year management period set out in the approved Restoration Management and Maintenance Plan.

The MWPA note from the Spelthorne Local Plan – Preferred Options Consultation Response Document dated September 2020, that minerals planning permission Ref. SP/2012/01132 is acknowledged (paragraph 5.1). It is also noted (at paragraph 7.3) that Brett Aggregates have indicated that they would complete extraction and restoration at the Manor Farm site within the next 2-3 years (i.e., by 2022/2023). The relevant 2-3-year timescale is plainly unrealistic as the minerals development is yet to commence and extraction and restoration operations are set to take six years to complete. It is also noted (at paragraph 5.3) that if any allocation within an MSA were to come forward, respective planning applications would need to take the MSA into account and the MWPA would need to be informed and provided with an opportunity to comment.

Accordingly, the county council does not consider the Pre-submission Spelthorne Local Plan 2022 - 2037 to be sound because it would not be effective and is not consistent with national planning policy. In order to make the plan sound, the MWPA consider that modifications to the wording within the Site Information table relevant to allocation Ref. RL1/011 (pages 182 to 183) are necessary. These proposed modifications are as follows:

#### Site Description and Existing Use

The site is part of the Staines and Laleham Sports club with access via Worple Road. The wider sports club measures 6.03 hectares. This comprises Part A (1.59 hectares) which is identified for housing and release from the Green Belt and Part B (4.44 hectares) which is identified for improved sports facilities

and is to be retained in the Green Belt. The whole of the site (Part A and Part B) is within a Minerals Safeguarding Area for concreting aggregate. The site is currently occupied by a sports pitch and is to the south of the sports club area. It borders housing to the southwest and a garden centre to the south. The Manor Farm site is to the east and is allocated as a Preferred Area for concreting aggregate by Policy MA2 of the Surrey Minerals Plan Primary Aggregates Development Plan Document 2011. The Manor Farm site benefits from planning permission (Ref. SP/2012/01132) for, inter alia, the extraction of 1,500,000 tonnes of sand and gravel over five-years; the provision of an underground tunnel beneath Ashford Road to accommodate a conveyor link between the Manor Farm extraction area and the Queen Mary Quarry (QMQ) processing area for the transport of minerals to the processing plant; vehicular access via Worple Road; and restoration to landscaped lakes for nature conservation study.  
(Please see attached document from page 8)

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent:</b> Sue Janota (19592417)
<b>Organisation:</b> Surrey County Council

<b>Response ID:</b> 1119899
<b>Policy / Evidence Base / Part of Plan:</b> SE1/020 (Sunbury Adult Education Centre, The Avenue)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Allocations SCC owned sites SCC's Land and Property team have reviewed the SCC owned sites included in section 10: allocations and support their inclusion with the following comments: SE1/020 Sunbury Adult Education Centre, The Avenue Anticipate an earlier timeframe of 1-5 years. Please see attached document for anything further related (may be found on page 7)
<b>Question 6:</b> You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent:</b> Sue Janota (19592417)
<b>Organisation:</b> Surrey County Council

<b>Response ID:</b> 1119900
<b>Policy / Evidence Base / Part of Plan:</b> SH1/010 (Shepperton Library, High Street)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
<p>Allocations</p> <p>SCC owned sites</p> <p>SCC's Land and Property team have reviewed the SCC owned sites included in section 10: allocations and support their inclusion with the following comments:</p> <p>SH1/010 Shepperton Library, High Street</p> <p>We note the desire to redevelop on current library space in Shepperton and this aligns with our long term plans to refurbish or redevelop this site to ensure it delivers a modern library service. It is essential that a library is re-provided and</p>

SCC welcome the opportunity to work jointly with Spelthorne on proposed plans. Any such work would be subject to a full options appraisal which would determine the most suitable location for the library service and services will be codesigned with residents and local stakeholders to ensure we are reflecting the needs of the community. These options appraisals will be undertaken at the appropriate time in line with the proposed housing plans. There will be a requirement to maintain service provision throughout the duration of works, so care needs to be given to the consideration of temporary relocation sites during the redevelopment period. Please see attached document for any further possible related reps. (Possibly page 7)

**Question 6:** You can upload any modifications below.  
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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?  
Yes/No/Not answered: No Response  
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent:</b> Sue Janota (19592417)
<b>Organisation:</b> Surrey County Council

<b>Response ID:</b> 1119905
<b>Policy / Evidence Base / Part of Plan:</b> ST1/028 (Leacroft Centre, Leacroft, Staines)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
<p>Allocations</p> <p>SCC owned sites</p> <p>SCC's Land and Property team have reviewed the SCC owned sites included in section 10: allocations and support their inclusion with the following comments:</p> <p>ST1/028 Leacroft Centre, Leacroft, Staines, SH1/015 Shepperton Youth Centre, Shepperton Court Drive, AS2/001 Ashford Youth Club, Kenilworth Road and</p> <p>ST1/031 Thameside Arts Centre, Wyatt Road</p> <p>No further comments to our previous Regulation 18 'Preferred Options' submission.</p>

On page 8 in attached document.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent:</b> Sue Janota (19592417)
<b>Organisation:</b> Surrey County Council

<b>Response ID:</b> 1119901
<b>Policy / Evidence Base / Part of Plan:</b> ST1/029 (Surrey County Council buildings, Burges Way, Staines)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Allocations SCC owned sites SCC's Land and Property team have reviewed the SCC owned sites included in section 10: allocations and support their inclusion with the following comments: ST1/029 Surrey County Council buildings, Burges Way, Staines Anticipate an earlier timeframe of 1-5 years. Please see page 7 for possible further related rep.
<b>Question 6:</b> You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent:</b> Sue Janota (19592417)
<b>Organisation:</b> Surrey County Council

<b>Response ID:</b> 1119902
<b>Policy / Evidence Base / Part of Plan:</b> ST1/030 (Fairways Day Centre, Knowle Green, Staines)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Allocations SCC owned sites SCC's Land and Property team have reviewed the SCC owned sites included in section 10: allocations and support their inclusion with the following comments: ST1/030 Fairways Day Centre, Knowle Green, Staines Anticipate an earlier timeframe of 1-5 years. Please see attached document for any further related reps (may be page 7)
<b>Question 6:</b> You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent:</b> Sue Janota (19592417)
<b>Organisation:</b> Surrey County Council

<b>Response ID:</b> 1119904
<b>Policy / Evidence Base / Part of Plan:</b> SC1/019 (Sunbury Social Services Centre, Vicarage Road)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
<p>Allocations</p> <p>SCC owned sites</p> <p>SCC's Land and Property team have reviewed the SCC owned sites included in section 10: allocations and support their inclusion with the following comments:</p> <p>SC1/019 Sunbury Social Services Centre, Vicarage Road</p> <p>Anticipate a slightly higher density than suggested and anticipate an earlier timeframe of 1-5 years.</p> <p>Please see attached document for anything further related (possible pages 7 &amp; 8)</p>

**Question 6:** You can upload any modifications below.

Spelthorne Reg 19 response September 2022 Final[301643] SCC SJ\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618839/PDF/->

[/Spelthorne%20Reg%2019%20response%20September%202022%20Final%5F301643%5F%20SCC%20SJ%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618839/PDF/-/Spelthorne%20Reg%2019%20response%20September%202022%20Final%5F301643%5F%20SCC%20SJ%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Jas (42011713)</b>	
<b>Organisation:</b>	
<b>Response ID: 1124616</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
As a resident of Spelthorne I am very disappointed to learn about the recent plans to forward 15 Green Belt sites around Ashford, Stanwell, Sunbury and Staines to be turned into building land. <a href="https://www.spelthorne.gov.uk/localplan">https://www.spelthorne.gov.uk/localplan</a> <a href="https://spelthorne.inconsult.uk/SDLPR19/consultationHome">https://spelthorne.inconsult.uk/SDLPR19/consultationHome</a> I moved away from Hounslow last year who started cramming every space with flats and losing the greenery and replacing it with ugly looking flats everywhere. I am voicing my opinion strongly along with many other residents: (1) asking Council to not amend existing Green Belt boundaries but to respect them,	

(2) asking Council to not to make a pro-active case for Green belt release in its draft Local Plan and not to declare that there are “exceptional circumstances” to justify Green Belt release,  
(3) categorically reject the Council’s classification of certain Green belt areas as “weakly performing” as well as the criteria invented to justify such classification. All Green Belt sites perform one or more important function by merely existing including checking the unrestricted sprawl of large built up areas, preventing neighbouring towns from merging into one another, assisting in safeguarding the countryside from encroachment, preserving the setting and special character of historic towns; and – extremely importantly - assisting in urban regeneration, by encouraging the recycling of derelict and other urban land (para.138 of the National Planning Policy Framework). All Green Belt is of considerable importance, is valued by residents and should remain protected.  
(4) express my disappointment that the Council has also refused to designate 19 Green Belt areas (that were proposed by residents) as Local Green spaces. Please reverse this refusal.  
Please do not sell up Spelthorne as once the flats are built you will never be able to recover the green belt.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Pat Jeffcott (42011105)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117513</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
The Wickets since the houses were built – more than 27 years. In that time I have used and seen my neighbours use this green space for the recreation of children, grandchildren and dogs. The benches are used for sitting and chatting by both the elderly and young mums. It has been the venue for many summer events and celebrations, the most recent being for the Queen’s Platinum Jubilee party. The Children’s Nursery from the next door Salvation Army Citadel use it for their end of year activities and The Salvation Army used it for carol singing. We were delighted that the council recently spent a lot of money on refurbishing the children’s play area which caters for small children and those with disabilities. This is an important community green space and deserves our protection.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Ms Jan Jefferies (25497825)</b>
<b>Organisation:</b>

<b>Response ID: 1112351</b>
<b>Policy / Evidence Base / Part of Plan: Policy SP1: Staines-upon-Thames</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Local Planning Consultation- Spelthorne Local Plan for Staines- Comments I do wonder if these plans for Staines' development are too ambitious without thought given to the following: Population Density Over-Population of the areas To quote from a leaflet I have received recently. 'Over five thousand of the borough's housing target of nine thousand plus will be squeezed into Staines. This can only be achieved by filling the town with Tower Blocks but not provide affordable homes for local families. The local plan marks a dramatic U turn from the current policy to protect the existing character of the town'

An example has already occurred in Stanwell, Argosy Lane, Clare Road where seven houses (rabbit hutches) are crammed into a narrow one way road behind the backyards of the shops. These have been fenced off to hide the massive refuse bins. I can't imagine how these bins are emptied as there is no room for a large vehicle to enter this side road/yard. How many other unsuitable 'nooks and crannies' are to be used to cram in rabbit hutch housing. I already consider Stanwell is on its way to over-development.

Back to Staines. Some of these plans seem doomed to failure and if ongoing will produce an overcrowded, unpleasant place to live and work that will benefit no one. Too many Tower Blocks - two already under construction dominating the streets giving a claustrophobic atmosphere to the area. As I am convinced that those lovely green spaces in time will eventually be sacrificed. Already on the local plan strategy shows small amounts are being used. How long before pressure increases to cope with the housing problem for more green space. Two pints won't go in one pint bottle.

Housing plus infrastructure is a major problem that may never fully be solved as the population continues to rise. Planning could eventually become more aggressive to meet these needs!

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Spencer Jefferies (19694369)</b>
<b>Organisation: National Grid</b>

<b>Response ID: 1128242</b>
<b>Policy / Evidence Base / Part of Plan: AT1/012 (Ashford Community Centre, Woodthorpe Road) - Pre-submission Spelthorne Local Plan (Reg 19) consultation</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Proposed development sites crossed or in close proximity to National Grid assets: Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to National Grid assets. Details of the sites affecting National Grid assets are provided below. Electricity Transmission Development Plan Document Site Reference: AT1/012 - Ashford Community Centre Asset Description : VW ROUTE: 275Kv Overhead Transmission Line route: IVER - LALEHAM

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning their networks.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets.

Please see attached files for full representation.

**Question 6:** You can upload any modifications below.

05.09.22 Asset Map.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/615840/PDF/-/05%2E09%2E22%20Asset%20Map%2Epdf>

05.09.22 Local Plan.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/615841/PDF/-/05%2E09%2E22%20Local%20Plan%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr and Mrs P Johnson (42011073)</b>
<b>Organisation:</b>

<b>Response ID: 1117512</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
LGS: Ashford Town; The Wickets I wish to protect The Wickets Ashford as a local green space. The recreational space is used as a children's play area.
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ryan Johnson (34289505)</b>
<b>Organisation: Crown Golf Angle Property</b>

<b>Response ID: 1128566</b>
<b>Policy / Evidence Base / Part of Plan: Policy SP2: Ashford, Shepperton and Sunbury Cross</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Thank you for the opportunity to comment on this consultation. We write on behalf of Crown Golf, who operate and have a leasehold interest in lands comprising Sunbury Golf Course. As you are aware, our client has made submissions at previous stages of the Local Plan, supported by a Vision Document and masterplan. The proposals included a modest level of residential use to the north east of the golf course and redevelopment of the existing developed parts of the site for leisure and community uses. The balance of the site was proposed as a country park, with associated landscaping and biodiversity improvements. Our client notes the freehold of lands east of the railway line than bisects the site has since been sold to a private developer. It is acknowledged the Council have also reached a conclusion there is insufficient justification to release part of these lands from their Green Belt designation for residential use at this time.

Accordingly, our client has asked that we limit our representations to lands west of the rail line, which are publicly owned, and includes the existing buildings, car park and floodlit driving range, and the residual part of the golf course (a former mineral workings site). Our client considers these lands provide an ideal opportunity to meet some of the identified deficiencies for formal leisure facilities in the area, with ancillary employment generating uses directed to the existing built parts of the site to provide additional social and economic benefits for the area.

Our client considers the majority of this could be delivered in a manner consistent with paragraphs 145, 148 and 149 of the NPPF, particularly given the deficiencies the Council have identified in this area for formal recreation facilities and ancillary uses.

Our client would accordingly welcome the opportunity to meet with representatives of the Council to explore this further prior to the Council finalising the Local Plan for formal submission to the Secretary of State.

In the interim, our client has examined the Pre-Submission Local Plan and its supporting evidence base and makes the following comments to assist the Council in finalising its Local Plan for the plan period to 2037: Please see attached document for relevant table.

We trust the enclosed comments are useful. Our client would welcome the opportunity to meet representatives of the Council discuss these matters further prior to the Local Plan being formally submitted for independent examination.

**Question 6:** You can upload any modifications below.

Turley\_Consultation Response (Crown Golf)3882\_Redacted.pdf  
<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618978/PDF/-/Turley%5FConsultation%20Response%20%5FCrown%20Golf%5F3882%5FRedacted%2Epdf>

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Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ryan Johnson (34289505)</b>
<b>Organisation: Crown Golf Angle Property</b>

<b>Response ID: 1128567</b>
<b>Policy / Evidence Base / Part of Plan: Policy E5: Open Space and Recreation</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
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No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
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We trust the enclosed comments are useful. Our client would welcome the opportunity to meet representatives of the Council discuss these matters further prior to the Local Plan being formally submitted for independent examination.

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Turley\_Consultation Response (Crown Golf)3882\_Redacted.pdf  
<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618977/PDF/-/Turley%5FConsultation%20Response%20%5FCrown%20Golf%5F3882%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ryan Johnson (34289505)</b>
<b>Organisation: Crown Golf Angle Property</b>

<b>Response ID: 1128569</b>
<b>Policy / Evidence Base / Part of Plan: Policy EC1: Meeting Employment Needs</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
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<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
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No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Thank you for the opportunity to comment on this consultation. We write on behalf of Crown Golf, who operate and have a leasehold interest in lands comprising Sunbury Golf Course. As you are aware, our client has made submissions at previous stages of the Local Plan, supported by a Vision Document and masterplan. The proposals included a modest level of residential use to the north east of the golf course and redevelopment of the existing developed parts of the site for leisure and community uses. The balance of the site was proposed as a country park, with associated landscaping and biodiversity improvements. Our client notes the freehold of lands east of the railway line than bisects the site has since been sold to a private developer. It is acknowledged the Council have also reached a conclusion there is insufficient justification to release part of these lands from their Green Belt designation for residential use at this time.

Accordingly, our client has asked that we limit our representations to lands west of the rail line, which are publicly owned, and includes the existing buildings, car park and floodlit driving range, and the residual part of the golf course (a former mineral workings site). Our client considers these lands provide an ideal opportunity to meet some of the identified deficiencies for formal leisure facilities in the area, with ancillary employment generating uses directed to the existing built parts of the site to provide additional social and economic benefits for the area.

Our client considers the majority of this could be delivered in a manner consistent with paragraphs 145, 148 and 149 of the NPPF, particularly given the deficiencies the Council have identified in this area for formal recreation facilities and ancillary uses.

Our client would accordingly welcome the opportunity to meet with representatives of the Council to explore this further prior to the Council finalising the Local Plan for formal submission to the Secretary of State.

In the interim, our client has examined the Pre-Submission Local Plan and its supporting evidence base and makes the following comments to assist the Council in finalising its Local Plan for the plan period to 2037: Please see attached document for relevant table.

We trust the enclosed comments are useful. Our client would welcome the opportunity to meet representatives of the Council discuss these matters further prior to the Local Plan being formally submitted for independent examination.

**Question 6:** You can upload any modifications below.

Turley\_Consultation Response (Crown Golf)3882\_Redacted.pdf  
<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618981/PDF/-/Turley%5FConsultation%20Response%20%5FCrown%20Golf%5F3882%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Ryan Johnson (34289505)</b>
<b>Organisation: Crown Golf Angle Property</b>

<b>Response ID: 1128570</b>
<b>Policy / Evidence Base / Part of Plan: Policy EC4: Leisure and Culture</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Thank you for the opportunity to comment on this consultation. We write on behalf of Crown Golf, who operate and have a leasehold interest in lands comprising Sunbury Golf Course. As you are aware, our client has made submissions at previous stages of the Local Plan, supported by a Vision Document and masterplan. The proposals included a modest level of residential use to the north east of the golf course and redevelopment of the existing developed parts of the site for leisure and community uses. The balance of the site was proposed as a country park, with associated landscaping and biodiversity improvements. Our client notes the freehold of lands east of the railway line than bisects the site has since been sold to a private developer. It is acknowledged the Council have also reached a conclusion there is insufficient justification to release part of these lands from their Green Belt designation for residential use at this time.

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Our client would accordingly welcome the opportunity to meet with representatives of the Council to explore this further prior to the Council finalising the Local Plan for formal submission to the Secretary of State.

In the interim, our client has examined the Pre-Submission Local Plan and its supporting evidence base and makes the following comments to assist the Council in finalising its Local Plan for the plan period to 2037: Please see attached document for relevant table.

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<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618979/PDF/-/Turley%5FConsultation%20Response%20%5FCrown%20Golf%5F3882%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ryan Johnson (34289505)</b>
<b>Organisation: Crown Golf Angle Property</b>

<b>Response ID: 1128571</b>
<b>Policy / Evidence Base / Part of Plan: Policy ID1: Infrastructure and Delivery</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
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We trust the enclosed comments are useful. Our client would welcome the opportunity to meet representatives of the Council discuss these matters further prior to the Local Plan being formally submitted for independent examination.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Cintia Jones (42011681)</b>
<b>Organisation:</b>

<b>Response ID: 1117528</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
When we moved to Elgin avenue 4 years ago, we were told by the local residents that the Green was remnant of the Orchard past of the area, back in 1800 / beginning of 1900 this part of Ashford Common was an Apple/Pears orchard that supplied fresh fruit to London . Whether this is true or not , the Green has some ancient trees that attract innumerable birds , and is well visited, used by many residents to walk their dogs and have the occasional children game – I personally enjoy walking, and like going around it when coming back from the shops. During lockdown we got to appreciate it even more while leaving the house for a short stroll. The junction of the street between Elgin Avenue and Cecil Road gets flooded when it rains a lot – the Green plays its part by absorbing the excess water from the streets.

In the last years , it has been used to store machinery and soil moved from other areas while Gas repair works was carried out in the area, but soon after they left it has recovered well ,and back to old green.  
We do want to keep it, it is an important part of the neighbourhood and make Elgin Avenue a healthier place to live , as there are no much green space nearby, otherwise.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Paul Kallee-Grover (40344545)</b>
<b>Organisation: Will Dowling</b>

<b>Response ID: 1125932</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
It is noted that site AS2/005 was discounted in the Officer Site Assessment document published in June 2022. This is despite the site having been previously identified as poorly performing Green Belt in the published Green Belt review and identified in the Preferred Options consultation as a site for open market housing, public amenity space and plots for up to 15 Travelling Showpeople. It is understood that objections were received in response to the Preferred Options stage to the Travelling Showpeople element of the AS2/005 allocation. The Council held discussions in November 2021 with the landowner of sites AS2/005 and AS2/006 to ask whether the more controversial Travelling Showpeople element of site AS2/005 at Land West of Edward Way could be moved to site AS2/006 at Land East of Desford Way. The council actively encouraged the landowner to progress with a planning application to secure consent for plots for Travelling Showpeople at Land East of Desford Way. The Land East of Desford Way is now subject to a live planning application for the provision of up to 15 plots for Travelling Showpeople to meet identified need (22/00798/OUT). In response to discussions with the

council, the landowner was also encouraged to make representations for the whole of site AS2/005 Land West of Edward Way to come forward for housing as well as a scheme for a mix of houses and Travelling Showpeople plots.

One of the SHLAA responses from the landowner demonstrated if the Travelling Showpeople element was removed then how the Land West of Edward Way could be capable of accommodating up to 60 homes. As acknowledged in the 'Discounted Alternative Allocations Sites' both options would help meet local housing needs. Our Ref: KI014220629 10 Ki Partnerships Ltd – Company ID 13801689 In discounting the Land West of Edward Way in June 2022 it could be suggested that the officer has already predetermined that the Travelling Showpeople plots can be moved from their previous Preferred Options position at Land at the West of Edward Way to Land East of Desford Way, prior to the matter having been resolved through the planning process. In addition, if the Land East of Edward Way were to have been progressed for housing, open space and travelling showpeople it would have scored as well as if not better than the Land East of Desford Way. Key to this that the Land East of Desford Way is strongly performing Green Belt (with a score of 1) whereas Land West of Edward Way is weakly performing Green Belt (with a score of 3). The Land West of Edward Way scores badly in terms of Feedback from the Preferred Options consultation because of the proposed use of the site (with a score of 1), whereas the Land East of Desford Way scores better (with a score of 2) but did not include for plots for Travelling Showpeople at the time of consultation. The Land East of Desford Way also scored well in terms of the Spatial Strategy Score because of a lack of available alternatives. We would suggest that this is not correct. The Land West of Edward Way remains an available alternative as set out in the Preferred Options. It is our suggestion that both sites are progressed for the provision of travelling showpeople. If the outline planning consent to provide plots for up to 15 people is successful on Land East of Desford Way, then the travelling showpeople element of the Land West of Edward Way can fall away (as there is only need for up to 15 plots as identified in the Gypsy and Traveller Accommodation Assessment 2018 for the plan period). If the outline application for up to 15 plots for Travelling Showpeople at Land East of Desford Way is not acceptable then the council has still safeguarded an alternative site within the borough to meet identified Travelling Showpeople need.

In summary, the site is located on the edge of the Ashford urban area. The site is within Green Belt and is occupied by an open grazing field. It is however adjacent to built form and therefore possesses a semi-urban character, with several urban influences acting on it. The site is not considered to make an important contribution to the wider strategic Green Belt and is weakly performing. Additional screening measures could reduce the impacts of development. The site is somewhat sustainably located, however there could be an opportunity to improve active travel links between the site and the wider built up area of Ashford. The site could deliver housing development to help meet needs.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response





<b>Respondent: Mr Paul Kallee-Grover (40344545)</b>	
<b>Organisation:</b> Will Dowling	
<b>Response ID:</b> 1112886	
<b>Policy / Evidence Base / Part of Plan:</b> AS2/006 (Land East of Desford Way)	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
The owner of the site supports the allocation of their land holdings at Land East of Desford Way as a site for up to 15 plots for 'Travelling Showpeople' It should be noted that site AS2/006 is now subject to a live planning application – reference: 22/00798/OUT. The application has been prepared in response to discussions held with the local plans team in November 2021, where it was suggested that the previous Travelling Showpeople element of a housing allocation at Land West of Edward Way (site AS2/005) as identified in the Preferred Options report (November 2019), should instead be provided on Land East of Desford Way. By moving the Travelling Showpeople allocation to site AS2/006 it was understood that this would allow site AS2/005 to come forward for housing and amenity space only, with no plots for Travelling Showpeople.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Shannon Katiyo (41940993)</b>
<b>Organisation:</b>

<b>Response ID: 1117505</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
LGS: Ashford Common: Norman Road I am writing to support the stretch of green land on Norman Road, TW15 as 'Local Green Space.' As you are aware, evidence also shows links between a greener living environment and higher life satisfaction and reduced mental distress, and strong evidence of improved self-rated mental health and reported stress. This small stretch of land is important for residents in the vicinity and those passing through including for walking, children playing, and for dog walkers. The visual aesthetic has a positive value as foliage on the sizeable mature trees on this stretch of land mark the changes in the seasons and further connect local residents with nature as the seasons change.

I am already disappointed that the council (County) previously cut the pear trees on the road verges in Norman Road and didn't bother to replace them. This negatively affected the character of the road, and I was shocked to find that residents have to pay the council if they want to replant trees on the verge, that the council itself has cut down.  
I hope you will consider this and other feedback in the Local Plan Consultation.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Rajesh Kavathekar (41771425)</b>
<b>Organisation:</b>

<b>Response ID: 1124241</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I am writing regarding the subject green belt which is under threat from unscrupulous selfish planning. While the whole world is working to save the planet Spelthorne council is in no hurry to save the green surroundings we are blessed with. This is already causing stress to the residents of the area. We will be deprived of the calming fare reaching views. We value our seclusion and privacy. We want to retain our natural light and beauty. We do not want to be subject to additional traffic and footfalls. I am writing to you to make sure no building takes place on the green belt at Groveley road and Oakhall drive Thank you,
<b>Question 6:</b> You can upload any modifications below.
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Jan Keating (33832961)</b>
<b>Organisation:</b>

<b>Response ID: 1109372</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Plan as a whole	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: As a non-lawyer, I have no idea.	Additional Comments: As a non-lawyer, I have no idea.
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No, the plan is not sound. Please see response to question 1.	Additional Comments: No, the plan is not sound. Please see response to question 1.
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Unknown.	Additional Comments: Unknown.
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>The Officer Local Plan site assessments interestingly do not assess any of the proposed building sites against how they will impact on local road usage. For example, when 300+ flats are built in a location, they will obviously be occupied by people, most of whom will have cars. The flats will have minimal parking. However, a far greater problem is that, when residents leave their homes in their cars, those cars have to exit onto existing roads. The roads in Staines town centre are already hugely congested. Trying to cross Staines Bridge at any time is an exercise in queueing. Trying to turn left at the top of Kingston Road to get into the High Street can take forever, with queues going as far back as the railway bridge near Leacroft at times. Trying to access the Crooked Billet roundabout from London Road is another exercise in patience. That, of course, is even before the flats which are currently being built</p>	



in Fairfield Avenue and London Road are fully occupied. Yet you propose to build more homes (mostly flats) with no expansion of the road system. Could you please clarify why planning officers were not directed to take this into consideration. The Officer Local Plan site assessments interestingly do not assess any of the proposed building sites against how they will impact on local road usage. For example, when 300+ flats are built in a location, they will obviously be occupied by people, most of whom will have cars. The flats will have minimal parking. However, a far greater problem is that, when residents leave their homes in their cars, those cars have to exit onto existing roads. The roads in Staines town centre are already hugely congested. Trying to cross Staines Bridge at any time is an exercise in queueing. Trying to turn left at the top of Kingston Road to get into the High Street can take forever, with queues going as far back as the railway bridge near Leacroft at times. Trying to access the Crooked Billet roundabout from London Road is another exercise in patience. That, of course, is even before the flats which are currently being built in Fairfield Avenue and London Road are fully occupied. Yet you propose to build more homes (mostly flats) with no expansion of the road system. Could you please clarify why planning officers were not directed to take this into consideration.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No point - the plan will go ahead.

<b>Respondent: V Kemp Smith (41591969)</b>
<b>Organisation:</b>

<b>Response ID: 1124227</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
To build on the Green Belt by the Running Horse Public House is totally unsafe!! DO YOU REALISE THAT THERE IS ASBESTOS BURIED THERE FROM BOMBED OUT HOUSES IN LONDON, THE LAND WAS USED FOR THE LANDFILL AT THAT TIME, ASBESTOS DOES NOT DISINTERATE FOR 200 YEARS OR MORE IT IS TOTALLY UNSAFE TO BUILD ON THIS SITE. IT COULD KILL PEOPLE!!! Why are the developers being so selfish AND money grabbing, it is DISPICABLE the way these people think that MONEY rules the world, indeed, it helps, but NOT for this purpose, as NO ONE can afford new houseing these days. DON'T DO IT, IT IS TO DANGEROUS. NB. There is a great shortage of DR's in the area

PLUS: It will increase the "bottleneck" of traffic, AND add to pulution.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mary Kerslake (33654913)</b>
<b>Organisation:</b>

<b>Response ID: 1112426</b>
<b>Policy / Evidence Base / Part of Plan: Policy ID1: Infrastructure and Delivery</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
I am not sure if you are aware that we are in a time of rising interest rates , a cost of living crisis and a war in Europe. Also we have our own individual concerns and priorities that take up our time. For example, as an infected person I am heavily involved in the Infected Blood Inquiry. I have to try and interpret my thoughts into Queen’s English when Sir John Major, in his submission, described it as bad luck ..... to be given infected blood that adversely impacted me for over half my life and cost my brother his life. I have to try and make sure the increasing food bank usage in the borough is adequately serviced. At such a time you ask about a strategic development plan for the Borough. Shame on you. Before you begin any development plans you MUST replace the whole of the sewerage and waste disposal structure for the borough. Most of the towns waste system was built in the early 20 <sup>th</sup> Century. This was an era pre-washing machines, dishwashers and showers. Most properties had one toilet, outside. You should be aware that there have been increasing incidents of flood warnings and flooding in the borough due to Global warming and

inadequate drainage facilities. Once the current system has been upgraded to current standards, then you can look at developments in the borough. However, the costly work that must be done before any development is all underground - out of sight. You then need to consider the enormous amounts of office space in the borough and decide what to do with that. Over the next 20 years working from home will increasingly become the "norm," Large offices with surrounding garden space become superfluous, even if they are owned by the council. That is where you need to focus any developments ..... away from the river and the Staines Town Centre.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Amir Khan (41984833)</b>
<b>Organisation:</b>

<b>Response ID: 1117181</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I am writing to support 'The Wickets park in Ashford' to be designated 'Local Green Space'. It has a children play area and is used by the local community for various recreational purposes which include local get togethers. We also had the Jubilee party here. The local community also walk the dogs here. This is one of the very few green spaces in a crowded neighbourhood and contributes significantly to biodiversity in the area.
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
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Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Jason Kiefer (41294241)</b>
<b>Organisation:</b>

<b>Response ID: 1111841</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Local Green Space: Sunbury Common : Catherine Drive I would like to express that the green in Catherine drive is of the utmost importance to our community and an integral part of the areas natural beauty. It is used daily by my children and neighbours children for recreational purposes. The adults use it for communal gatherings and recently it was used for the queens jubilee. Over the past 50 years this green has contributed to the well being of the residents and has been maintained by the council and us. We take pride in the green and its appearance and use it to its full potential. It was most gratefully received in the recent pandemic where we were about to socially meet and talk to our neighbours (socially distanced) and keep a good sense of well being in the community. The green has brought the residents together so much so we raised a massive £27k in 4 weeks to try to purchase the green to secure its future. The loss of this green would have a catastrophic effect on the neighbourhood and the wellbeing of the children and parents which use this area daily. Several established trees are upon the



green again providing an abundance of wildlife again adding to the need to preserve this area. One resident who has lived here since the houses were first built has planted a tree in memory of her late brother who used to play here on visits. Over the years many special occasions including the queens jubilees have been celebrated here with shows provided by Manfred mann who lived here during the 70s. In essence this is an integral part of this community and it needs to be preserved for future generations to enjoy.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Kim Lansdowne (33663393)</b>	
<b>Organisation:</b>	
<b>Response ID: 1125937</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: I do not have the legal knowledge to answer this, but I am sure after all the work hours which have been put into drawing up the plan, that the officers would have made sure that it is compliant.
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: I am a Staines resident, and I am unhappy that such a large percentage of the proposed housing will be squashed into the town centre, and require unsightly tower blocks. I understand that Staines has good transport links, but Sunbury, Ashford and Sheppert
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: Yes, I believe the Local Plan has complied unfortunately with the terms forced upon us.
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
I understand that the plan is not based on the latest ONS figures, but I know that the government has not allowed these to be used. Yes, it seems to be up to date.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No Response	
<b>Question 6: You can upload any modifications below.</b>	

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: The main change I would propose is the share the housing target more evenly around the borough.

<b>Respondent: Julie Last (42095745)</b>	
<b>Organisation:</b>	
<b>Response ID: 1124633</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>Although I am a resident of Runnymede Borough Council, I have many friends in Spelthorne and use facilities there.</p> <p>I am writing to plead with the Council to NOT release Green Belt Land for ANY uses. These are precious spaces, becoming ever rarer and we know that once they have gone will never be reinstated. This is a travesty as they were designed to prevent urban sprawl and are havens for wildlife and fauna, not to say humans who can escape to some of them for some peace and recreation.</p> <p>We trust our Councillors to do the right thing and often feel helpless in the face of the onslaught to find ever more housing sites, when in fact there are brown field sites and empty office/shop spaces, which with a little creative planning can be turned into elegant and affordable housing.</p> <p>Please rethink your plans to release these sites.</p>	
<b>Question 6:</b> You can upload any modifications below.	

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Name (0)</b>	
Organisation: On Behalf Of	
<b>Response ID: 0</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy Name	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Question:1 Do you consider this part of the Pre-Submission Spelthorne Local Plan to be legally compliant ?	Additional Comments: Question:1 Do you consider this part of the Pre-Submission Spelthorne Local Plan to be legally compliant ?  Comment
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: Question:2 Do you consider this part of the Pre-Submission Spelthorne Local Plan to be sound ?	Additional Comments: Question:2 Do you consider this part of the Pre-Submission Spelthorne Local Plan to be sound ?  Comment
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Question:3 Do you consider this part of the Pre-Submission Spelthorne Local Plan complies with the Duty to...	Additional Comments: Question:3 Do you consider this part of the Pre-Submission Spelthorne Local Plan complies with the Duty to...  Comment
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Question:2a If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please...	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Question:4 Please give details of why you consider the Local Plan is not legally compliant or is unsound...	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Question:5 Please set out the modification(s) you consider necessary to make the Pre-submission Speltho...	

**Question 6:** You can upload any modifications below.

Question:6 You can upload any modifications below. If you have any issues with uploading a document ple...

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Question:7 If your representation is seeking a modification to the plan, do you consider it necessary to pa...

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Question:7 If your representation is seeking a modification to the plan, do you consider it necessary to pa... | Comment

<b>Respondent: Mr John Latchana (41772641)</b>
<b>Organisation:</b>

<b>Response ID: 1124242</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I write to voice my objection to any proposal to build on the Running Horse Green Belt. Any development will result in a loss of a local amenity, result in additional traffic, put a strain on the local infrastructure, affect the quality of life in the locality and undermine the authority's commitment to the local ecology.
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
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Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Moira Lawrence (25306945)</b>
<b>Organisation:</b>

<b>Response ID: 1124082</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Running Horse Green Belt I am writing to express our concerns and objections to the proposal to build 200 homes on the green belt land by the Running Horse. The infrastructure is not there to support the additional homes. The schools are full, the dentists are full and you cannot access medical appointments in any reasonable time. It is a known fact that open space is needed to allow people to breathe and experience nature for their mental well being. More houses and cars will increase the pollution in the area. Please reconsider for all of our sakes and for the health of our children and future generations. Ideally it should be returned to farm land.
<b>Question 6:</b> You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Cllr Vivienne Leighton (42100865)</b>	
<b>Organisation:</b>	
<b>Response ID: 1119441</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
For consideration for inclusion as Local Green Space Junction of Shepperton High St and Cliveden Place A small area in the built-up High Street in Shepperton offering a much-appreciated green space. Local community volunteers already look after the provision of flowers in various beds down the High St and this green area offers a tree-planting opportunity to support the community's existing efforts to encourage bio-diversity and wildlife here.	
<b>Question 6:</b> You can upload any modifications below.	
For consideration for inclusion as Local Green Space - Shepperton cllrs_Redacted.docx	

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618970/DOCX/-/For%20consideration%20for%20inclusion%20as%20Local%20Green%20Space%20%2D%20Shepperton%20cllrs%5FRedacted%2Edocx>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr James Leuenberger [Montagu Evans] (25762913)</b>
<b>Organisation: Welbeck Land</b>

<b>Response ID: 1120574</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
On behalf of our client, Welbeck Land, we write to you to make representations in respect of the Regulation 19 consultation on the Pre-submission Spelthorne Local Plan 2022 – 2037, in the context of draft site allocation AT1/002 (Land East of Ashford Sports Club, Woodthorpe Road). Policy ST2 (Planning for the Borough) Policy ST2 (Planning for the Borough) outlines how the housing requirement will be met over the Plan period and identifies that proposed site allocations will yield 6,073 homes, of which 5244 homes will be delivered in the urban area, with 829 homes coming from sites in the Green Belt. The site benefits from an allocation for approximately 108 units, which is welcomed by our client and a reflection that the site is appropriate for release from the Green Belt and will contribute to the Council’s housing land supply. Whilst we understand the need for the Council to apply indicative housing

delivery figures to the site as part of its housing delivery trajectory exercise we would recommend that the Plan makes clear that such targets are a minimum as is the consistent approach across many Local Plans.

The Council has not undertaken any detailed masterplanning work for the site and whilst we are confident this figure is achievable we consider the site may have an opportunity for a larger amount of housing units. Indicative plans being developed by the client show that circa 150 units may be achievable, depending on the specific housing typology, unit mix proposed and car parking requirements. We suggest that the specific capacity of the site is confirmed through pre-application discussions in due course, and accounts for matters such as site layout, orientation and an analysis of the building heights which may be achievable.

Adopting this approach will ensure that the capacity of sites is not artificially capped which will in turn ensure that the Council cannot just meet but possibly exceed its housing numbers as recommended by National Planning Policy.

See attached document.

**Question 6:** You can upload any modifications below.

220915 Land at Ashford Sports Club - Regulation 19 Representations (inc. Appendices).pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/593315/PDF/->

[/220915%20Land%20at%20Ashford%20Sports%20Club%20%2D%20Regulation%2019%20Representations%20%5Finc%2E%20Appendices%5F%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/593315/PDF/-/220915%20Land%20at%20Ashford%20Sports%20Club%20%2D%20Regulation%2019%20Representations%20%5Finc%2E%20Appendices%5F%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr James Leuenberger [Montagu Evans] (25762913)</b>
<b>Organisation: Welbeck Land</b>

<b>Response ID: 1126212</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
On behalf of our client, Welbeck Land, we write to you to make representations in respect of the Regulation 19 consultation on the Pre-submission Spelthorne Local Plan 2022 – 2037, in the context of draft site allocation AT1/002 (Land East of Ashford Sports Club, Woodthorpe Road). Policy ST1 (Presumption in Favour of Sustainable Development) Policy ST1 (Presumption in Favour of Sustainable Development) explains that the Council is planning to deliver 9,270 homes over the Plan period (or 618 homes per year) which satisfies the objectively assessed need with reference to the Government’s standard methodology for housing need. In planning for this amount of growth, the Council’s approach is consistent with national policy which seeks to significantly boost the supply of homes where these are needed (NPPF Paragraph 60) and for the standard method to be applied to determine the number of homes needed in a Local Plan



(NPPF Paragraph 61). We support the Council's approach to meet objectively assessed needs. This is important to demonstrate that the Plan is positively prepared, which is a key soundness matter.

We also note that to achieve the objectively assessed need the Council has put forward a case of exceptional circumstances to remove land in the Green Belt through amending the current Green Belt boundaries through adoption of the Plan. The Council's published topic paper (Topic Paper 1, published 25 July 2022) concludes that housing in the Green Belt is necessary to meet needs in full and to deal with historic under delivery in past years which has resulted in the Council being a 'presumption authority'. Further, the Council has concluded that the sites selected for allocation are least harmful in Green Belt terms and would deliver the most benefit to satisfactorily outweigh any harms. In our previous representations to earlier stages of the Local Plan consultation we have explained that Green Belt release is fundamentally required in the context of the severe housing challenges the Borough faces.

Within this context, Policy ST1 (Part 2) makes clear that applications which accord with the Plan will be approved without delay, unless material considerations indicate otherwise. Implicitly therefore, applications for development on sites allocated for development, including those being removed from the Green Belt, will be supported as a matter of principle. We welcome this approach which is unambiguous and a demonstration that the Council is looking to accommodate development where this aligns with the emerging spatial strategy. Accepting the importance of the Green Belt it is clear that the Council has undertaken an assessment of potential Green Belt release sites and applied the requisite exceptional circumstances test allowing them to conclude that this site is appropriate for release. This is fully supported.

See attached document for full response.

**Question 6:** You can upload any modifications below.

220915 Land at Ashford Sports Club - Regulation 19 Representations *inc. Appendices.pdf*

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/608275/PDF/->

[/220915%20Land%20at%20Ashford%20Sports%20Club%20%2D%20Regulation%2019%20Representations%20%5Finc%2E%20Appendices%5F%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/608275/PDF/-/220915%20Land%20at%20Ashford%20Sports%20Club%20%2D%20Regulation%2019%20Representations%20%5Finc%2E%20Appendices%5F%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr James Leuenberger [Montagu Evans] (25762913)</b>
<b>Organisation: Welbeck Land</b>

<b>Response ID: 1120575</b>
<b>Policy / Evidence Base / Part of Plan: Policy PS2: Designing places and spaces</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
On behalf of our client, Welbeck Land, we write to you to make representations in respect of the Regulation 19 consultation on the Pre-submission Spelthorne Local Plan 2022 – 2037, in the context of draft site allocation AT1/002 (Land East of Ashford Sports Club, Woodthorpe Road). Policy PS2 (Designing Places and Spaces) Policy PS2 (Designing Places and Spaces) sets out the Council’s overarching policy to design. We have no observations on the policy objectives which are reasonable in targeting high quality development in Spelthorne. Part 7 of Policy PS2 relates to developments exceeding 50 dwellings on former Green Belt land. It is flexibly worded to accept that on such sites it may not always be desirable to reflect locally distinct patterns of development and instead such sites should create their own identity to ensure cohesive and vibrant neighbourhoods. We welcome and support this policy approach.

This policy, however, seeks to introduce a requirement for developments to go before a design review panel. In our view this is onerous for sites that are recommended for allocation, whereby the allocations identify a development area and appropriate site capacity for the site. In our view the requirement for a design review panel must remain optional and not mandatory, and generally to be reserved for development sites where a third party assessment of a scheme is required to determine what constitutes an appropriate response for the site. We suggest this element of the policy is removed. See attached document for full response.

**Question 6:** You can upload any modifications below.

220915 Land at Ashford Sports Club - Regulation 19 Representations (inc. Appendices).pdf

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr James Leuenberger [Montagu Evans] (25762913)</b>	
<b>Organisation: Welbeck Land</b>	
<b>Response ID: 1120577</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ID2: Sustainable Transport for New Developments</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
On behalf of our client, Welbeck Land, we write to you to make representations in respect of the Regulation 19 consultation on the Pre-submission Spelthorne Local Plan 2022 – 2037, in the context of draft site allocation AT1/002 (Land East of Ashford Sports Club, Woodthorpe Road). Policy ID2 (Sustainable Transport for New Developments) Policy ID2 (Sustainable Transport for New Developments) is a strategic policy targeting sustainable transport measures in development. Part 1 of the policy states the new developments will be need to incorporate opportunities to facilitate sustainable and active modes of travel and lists several requirements, including:	
<ul style="list-style-type: none"> <li>• Provision of, or contribution towards, the improvement of public and community transport;</li> </ul>	

- Providing improvements to or contributions towards improving the capacity and security of cycle parking at the Borough's public transport interchanges; and
- Providing funding to deliver highways improvements to support the spatial strategy.

The current policy is ambitious, but we conclude it is not reasonable and would be too onerous. Obviously the Council can only seek proportionate contributions that are necessary to make development acceptable in planning terms, and clearly not all individual development sites can be expected to fund bus and rail services which is a matter for strategic consideration. This could have the unintended consequence of making development unviable and this must be reviewed by the Council, to avoid having a wider impact on housing delivery more widely. See attached document for full response.

**Question 6:** You can upload any modifications below.

220915 Land at Ashford Sports Club - Regulation 19 Representations (inc. Appendices).pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/593328/PDF/->

[/220915%20Land%20at%20Ashford%20Sports%20Club%20%2D%20Regulation%2019%20Representations%20%5Finc%2E%20Appendices%5F%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/593328/PDF/-/220915%20Land%20at%20Ashford%20Sports%20Club%20%2D%20Regulation%2019%20Representations%20%5Finc%2E%20Appendices%5F%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr James Leuenberger [Montagu Evans] (25762913)</b>
<b>Organisation: Welbeck Land</b>

<b>Response ID: 1119761</b>
<b>Policy / Evidence Base / Part of Plan: AT1/002 (Land East of Ashford Sports Club, Woodthorpe Road)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
The representations are submitted on behalf of Welbeck Land, in the context of draft site allocation AT1/002 (Land East of Ashford Sports Club, Woodthorpe Road). Please see attached for further in depth rep. AT1/002 (Land East of Ashford Sports Club, Woodthorpe Road). The Site The site subject to this draft allocation measures approximately 2.85 acres / 1.15 hectares. It is flat and has been unused for in excess of 10 years. Welbeck Land were selected by the Ashford Sports Club in 2019 as their preferred Development Partner to promote the land subject to this draft allocation through the Local Plan process for residential development.

The site is also currently being used on a temporary basis by Esso as they undertake works on the new Southampton to London Pipeline, and therefore could arguably be considered a brownfield site (Appendix 1). See attached documents.

As can be seen from the letter from Ashford Sports Club (Appendix 2) they consider the site to be surplus to their requirements and any financial receipts received from the redevelopment of the site will be used to help finance the Clubs sporting facilities to help ensure its long term future to the benefit of all its existing and future members.

Site Allocation AT1/002 (Land East of Ashford Sports Club, Woodthorpe Road)

As outlined above (see attached document), we welcome the allocation of this site and its proposed removal from the Green Belt. We make the following observations about the site-specific requirements in the allocation (see Appendix 3):

- Proposed Allocation – at this stage, we welcome the intention behind a reference to unit numbers (approximately 108 units) rather than a specific typology, but note that a greater number of units could be achievable subject to the final detailed site layout and design. Such inherent flexibility of the final form of development which allows for a variety of types of housing and density to be delivered on the site to meet identified needs as well as market demand is welcomed.
  - Contribution to Ashford Sports Club – the fundamental objective of bringing forward the site for redevelopment is to provide for the enhancement of facilities at the adjacent Sports Club, and as such we welcome this reference in the draft allocation. As noted above this is fully supported by Ashford Sports Club.
  - Enhancement of Boundary Planting / Strengthening of Green Belt Boundaries – our client is committed to using boundary planting as an opportunity to provide net gains in biodiversity, with the specific detail of this to be confirmed. Furthermore, the importance of strengthening adjacent Green Belt boundaries to retain its performance and strategic role is also noted. Both matters would be discussed and formalised through the pre-application and formal planning application process.
  - 50% affordable housing – this is subject to viability which is obviously an important consideration so that the ability of any scheme to deliver 50% affordable housing can be robustly tested.
  - Transport Mitigation – given the allocation is for only approximately 108 units the Council must be proportionate in seeking contributions towards any public transport or sustainable transport measures. This would need to be negotiated with the Council in a future application to ensure appropriateness.
  - Infrastructure contributions – linked with the point above, the allocation wording correctly identifies that any contribution can only be sought where necessary to make the site acceptable in planning terms. As explained above Policy ID2 should make this explicit too for completeness.
  - Sustainability – we agree with the intention for development to maximise the use of Climate Change measures and renewable energy sources, however the inclusion of Policy DS2 is not correct, given this does not feature in the rest of the emerging Local Plan. We suggest that this be updated.
- Please see attached document for full rep.

**Question 6:** You can upload any modifications below.

220915 Land at Ashford Sports Club - Regulation 19 Representations (inc. Appendices).pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/590008/PDF/->

[/220915%20Land%20at%20Ashford%20Sports%20Club%20%2D%20Regulation%2019%20Representations%20%5Finc%2E%20Appendices%5F%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/590008/PDF/-/220915%20Land%20at%20Ashford%20Sports%20Club%20%2D%20Regulation%2019%20Representations%20%5Finc%2E%20Appendices%5F%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Trevor Lewis (40366753)</b>	
Organisation:	
<b>Response ID: 1123641</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>I would like register my disapproval of the proposed mass housing development plans for Staines / Spelthorne.</p> <p>My next door neighbour and councillor Jo Sexton has voted against this work as the existing infrastructure / road network is already insufficient as seen daily. I agree with her stand point and would like to be advised of what steps we can take to stop this unviable work.</p> <p>I believe the councillors who voted against this work all live locally and the councillors who voted for it live elsewhere. Poor system open to abuse.</p> <p>Please acknowledge receipt of this correspondence and keep me informed of a right to vote against these works</p>	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Sam Lindsay (42095873)</b>
<b>Organisation:</b>

<b>Response ID: 1124634</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
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<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I object to the use of our green belt areas in Spelthorne being used to build more homes / flats or what ever use they want it for . We need more schools for our already over populated area . I live locally in Staines and we need to stop these plans
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
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Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Angela Lintott (42010657)</b>
<b>Organisation:</b>

<b>Response ID: 1117502</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
For keeping the green space: Ashford Town : The Wickets The land mentioned is used by local children & local playgroups as there are no main roads near to cause any danger to them.
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Ms Elizabeth Lloyd (19791009)</b>
<b>Organisation:</b>

<b>Response ID: 1111243</b>
<b>Policy / Evidence Base / Part of Plan: SN1/006 (Land to west of Long Lane and south of Blackburn Trading Estate)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No Response
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response





<b>Respondent: Diocese of London (42272161)</b>
<b>Organisation:</b>

<b>Response ID: 1128198</b>
<b>Policy / Evidence Base / Part of Plan: Sustainability Appraisal</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Sustainability Appraisal 3.19 A Sustainability Appraisal has been prepared as part of the Local Plan evidence base and has been regularly updated to reflect the evolution of emerging policy. 3.20 The spatial strategy in the pre-submission Local Plan mostly aligns with Option 4 which comprises the following: Option 4 would seek to disperse development across the borough, incorporating elements of Options 1-3. This option would meet development needs and allows for a more balanced approach. A mix of housing could be provided with the protection of the Borough’s open spaces and employment uses. This option would result in a small amount of greenfield land take however prioritises previously developed land and that which holds a more limited environmental value. Whilst this option would introduce development into flood risk areas and may impact the environment where greenfield land is

allocated, the majority of development would be focused in the urban area and would seek to improve sustainability and connections between settlements through a dispersed approach to growth. This option was identified as the preferred approach given its more balanced performance against the SA Objectives

3.21 This option has been enhanced to maximise positive sustainability effects and reduce negative impacts on the Green Belt. We support the Council's balanced approach which seeks to prioritise brownfield, while recognising brownfield land alone will not meet housing need.

3.22 Releasing Green Belt land will be necessary in order to meet housing needs, deliver necessary infrastructure and increase affordability. The Land East of Upper Halliford Road is a suitable and available area of land which will not impact on the wider integrity of the Green Belt.

3.23 The Sustainability Appraisal also assesses the sustainability credentials of the allocated sites. Our view on the assessment is included below.

SA Assessment - Policy HS1/012: Land East of Upper Halliford, Nursery (northern site)

3.24 The Sustainability Appraisal recognises a number of benefits to bringing the site forward. Particularly the benefits associated with the provision of the new access road to Bishop Wand School. Pre-app discussion have been held with Spelthorne Council and the County Highways who have confirmed that proposed access is safe and suitable. This will promote sustainable and active transport options. We fully support this conclusion.

3.25 However, the appraisal concludes that the development would have a negligible impact on health. We disagree with this conclusion. The provision of circa 60 dwellings will provide much needed homes for the local community. Furthermore, as set out above, the site will provide active transport links which helps promote healthy lifestyles for new and existing residents. It would be reasonable to argue that these elements will result in a positive impact on health. We recommend that Option 2 (Health) is amended to reflect this.

3.26 The Sustainability Appraisal identifies a number of areas which may require further mitigation including flood risk, land and soil, pollution, biodiversity, open space and landscape, and water. Firstly, it is important to recognise that most sites that come forward for development will be constrained to an extent. The above constraints can be addressed through appropriate mitigation measures such as improved landscaping, the use of sustainable construction methods and the implementation of biodiversity enhancements.

3.27 A developer is now associated with the site and are keen to progress a more detailed design. This supports the deliverability of the site within the next 5 years.

Policy HS1/012b: Land East of Upper Halliford, Nursery (southern site)

3.28 As with the northern site, the Sustainability appraisal recognises a number of benefits to bringing the site forward. In particular the housing, economic, health and transport benefits. However, the assessment fails to recognise the full range of benefits to the scheme coming forward. We recommend the assessment highlights the opportunity for an education cluster in this location, rather than having a new facility by itself. The socio-economic benefits associated with the provision of a sixth form should also be recognised.

3.29 As set out above, the constraints identified can be overcome through the appropriate mitigation measures.

See attached document for full response (SA begins from page 12).

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Diocese of London (42272161)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128199</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Housing Trajectory; CIL	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>Planning for Housing Delivery</p> <p>3.30 The Planning for Housing Delivery Document has been prepared as part of the Local Plan evidence base. The purpose of this document is to consider potential risks to Spelthorne Borough Council (SBC) of excluding Green Belt sites from housing allocations in the emerging Local Plan. The data analysis uses the geography of the three Community Infrastructure Levy (CIL) Zones (see map below) in Spelthorne. The land East of Upper Halliford Road sits within Zone 3 (South).</p> <p>3.31 The report confirms that Excluding Green Belt sites, the Local Plan identifies sites that meet the criteria for inclusion in the five-year housing land supply (5YHLS) with a capacity of 3,409 dwellings (681dpa, or 5.5 years' worth of supply). However, a 20% buffer is applicable as a result of past under</p>	

delivery resulting in the Council falling short of the required land supply under paragraph 74 of the NPPF. This therefore results in a 4.5 year supply with the application of a buffer.

3.32 While SBC may be able to demonstrate a 5YHLS without the application of a buffer, the pipeline beyond 2024/25 is significantly weaker and raises the prospect of the Borough potentially slipping into a significant shortfall. Furthermore, any unforeseen capacity reductions would impact the Council's ability to demonstrate a 5 YHLS and put the Council at risk of speculative applications coming forward under the presumption in favour of sustainable development.

3.33 It is evident that the Spelthorne Borough Council should seek to strengthen their land supply pipeline. Highly accessible and well contained sites, such as the Land East of Upper Halliford Road, should be included in the housing land supply to ensure development comes forward in suitable locations.

3.34 The report also highlights concern regarding Spelthorne's land supply pipeline which shows an imbalance of supply across the Borough. 10.8% of new homes are expected to be built in Zone 1 (North) while Zone 2 (Mid) accounts for 79.7% with Zone 3 (South) making up the remaining 9.5%. Over-concentration of homes in area will impact local infrastructure. Furthermore, it will impact the delivery rate of affordable homes.

3.35 The report advises that releasing additional land in Zones 1 (North) and 3 (South) will help reduce "policy risk" given the relative strength of historic supply of affordable units in Zone 1 (North), and the popularity of Zone 3 (South) for older residents.

3.36 The Planning for Housing Delivery Report highlights key risks with housing delivery across the district. First, the Council cannot demonstrate a 5 YHLS. Therefore, it is vital that Spelthorne allocate sufficient land going forward to meet housing requirements. Furthermore, Green Belt release will be necessary to meet need. This reinforces Green Belt allocations coming forward as part of the Local Plan review.

3.37 Second, there is a significant imbalance between development across the Borough with the majority of development being focused in CIL Zone 2. Not only does this put undue pressure on social infrastructure, but it impedes delivery of affordable homes across the Borough. It is therefore important that suitable sites across the wider Borough are brought forward to even out the distribution of homes and in particular, affordable homes.

See attached document for full response.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Diocese of London (42272161)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128201</b>	
<b>Policy / Evidence Base / Part of Plan: Objectives</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Destinations and Objectives	
4.1 We are broadly in support of the Council's District-wide development objectives set out in this chapter. In particular, we support the requirement to meet educational needs in Spelthorne.	
4.2 Paragraph 95 goes on to set out that a sufficient choice of school places should be made available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. This includes:	
a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and	
b) work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.	

4.3 The delivery of a new sixth form facility at Land at Upper Halliford Road (South Site) will help to provide the necessary choice in the District, which is currently restricted by a very limited provision of further education options. This will also assist with the Council's sustainability and economic objectives, by virtue of the reduction in travelling out of the Borough for further education needs and the greater opportunities to local residents for enhancing their career objectives.

See attached document for full response,

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Diocese of London (42272161)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128202</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Evidence Base - Green Belt Assessment	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Green Belt Assessment (Stage 1,2 & 3) 3.2 The Green Belt Assessment (Stage 1) was published by Arup in February 2018. The purpose of this was to provide evidence of how different areas perform against the Green Belt purposes. 3.3 The site forms part of Strategic Area B which is a band of Green Belt maintaining separation between a number of settlements. The site was assessed as part of Local Area 32, which included 139.1 ha of land. The results of the assessment are set out in the table below: (see document, page 9 for table) 3.4 The assessment stated that sub-areas were identified for further consideration based on their performance against NPPF purposes only, rather than their suitability for development or release in terms of sustainability, infrastructure and wider planning considerations, including their existing land use.	

3.5 The northern area of Local Area 32 (which includes Land East of Upper Halliford Road) was identified as having scope for sub-division (Ref: AC-13) along with 5 other areas. This assessment states that “while the southern part of the Local Area is critical in maintaining the gap between Upper Halliford and surrounding settlements, and also forms a wider swathe of more open countryside, the northern area (identified as AC-13) is judged to be less critical to the overall integrity of the Green Belt”

3.6 It was judged that sub-area AC-13 would not constitute an outward sprawl of the large built-up area, which already extends a substantial distance to the South (Purpose 1). Furthermore, it was concluded by the report that the sub-area would not fundamentally undermine the integrity of any key gaps between settlements at the strategic level (Purpose 2) and is not connected to a historic core (Purpose 4).

3.7 On this basis the sub-area was unlikely to meet the objectives of the five tests of the Green Belt set out in the NPPF and thus it was recommended for further consideration.

#### Stage 2

3.8 The Green Belt Stage 2 assessment was published in December 2018. Through this more refined assessment, sub-area AC-13 was sub-divided into 32-a and 32-b as it was deemed suitable for further consideration. The results of the assessment are as follows: (see page 10 in attached document for table)

3.9 The assessment states that in its entirety, Sub-area 32-a meets the purposes strongly overall, but the northern part makes a less important contribution to the wider strategic Green Belt, therefore the northern part was recommended for further consideration along with sub area 32-b (Ref: RC-3). On this basis the northern part of Land East of Upper Halliford Road was allocated and the southern part was not.

3.10 While we agree in part with the assessment (regarding the northern section of the site), we consider the final recommendation to be inaccurate (in relation to the southern part of the site), therefore misinforming the site selection process.

#### Stage 3

3.11 The Green Belt Assessment (Stage 3) was published by Spelthorne Council in July 2022. This Green Belt Assessment reviews specific Green Belt sites that has been allocated in the emerging Plan.

3.12 The assessment for the northern parcel determined that the site is ‘moderately performing / partly less important’. This is lower performing than the two previous assessments. However, it determines that the site is enclosed by directly adjacent development on the eastern and western boundaries and as such plays a very limited role in preventing merging of settlements (purpose 2).

3.13 It was also considered that the northern part of the sub-area has a more rural character, with limited views to the surrounding built form due to the mature tree lines to the north, east and west and therefore would not play a major role in safeguarding the countryside from encroachment (purpose 3). It is considered to make a negligible contribution to purpose 4 given that the site does not abut any historical features. We consider that the site does not merit ‘moderately performing’ status given it is surrounded on three sides by development and has very limited external views of the site. If tis type of site does not receive the lowest possible assessment in Green Belt terms, then we are unclear what sort of site would.

3.14 The southern parcel has also been assessed in the Stage 3 assessment. The assessment determines that the parcel is considered 'strongly performing/partly less important'.

3.15 The assessment notes that that the southern area plays a more important role in preventing merging and restricting sprawl into the countryside. We consider this judgement to be incorrect the southern part of the site only extends marginally beyond the existing school buildings to the south and does not sprawl from existing towns. The impact on the open countryside and coalescence is negligible when viewed in this context. This could be further mitigated by layout and landscaping.

3.16 It is considered that the southern part of this area is of sufficient scale that settlement coalescence is unlikely to occur. The trees to the south act as a strong Green Belt boundary whilst limiting the merging of settlements.

3.17 In addition, it would appear that the whole of the southern site has been assessed for its impact on the Green Belt. Realistically the long narrow southern element is unlikely to be developed. This land could provide landscaping and remain undeveloped and a reassessment of the site excluded this part of the site would be likely to come to a similar conclusion to the northern site (32A). Notably, the northern part of the southern site is surrounded by development to the east and west (beyond the wooded area) and when the long narrow part of the site is excluded, the site does not extend much beyond the school buildings to the west. This means that the impact on the Green Belt should be limited as there would only a very small extension beyond the existing southern building line of Upper Halliford.

3.18 At the very least, the Council may want to consider if the conclusions for the southern site reflect what is likely to be delivered. See attached document for full rep.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Diocese of London (42272161)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128196</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy H1: Homes for All	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Policy H1: Homes for All 4.12 The proposed target mix of homes is as follows; Market Homes <ul style="list-style-type: none"> <li>• 1-bed properties: 0 - 5%;</li> <li>• 2-bed properties: 20-25%;</li> <li>• 3-bed properties: 50-55%; and</li> <li>• 4-bed properties: 20-25%.</li> </ul> Affordable/ Social Rented	

- 1-bed properties: 15-25%;
- 2-bed properties: 40-45%;
- 3-bed properties: 25-35%; and
- 4-bed properties: 5-10%

Affordable Ownership (First Homes)

- 1-bed properties: 35-40%;
- 2-bed properties: 25-30%;
- 3-bed properties: 25-30%; and
- 4-bed properties: 5-10%

4.13 The need for different types, sizes and tenures of homes required has been assessed through the Strategic Housing Market Assessment (SHMA) 2015 and SHMA update 2019. This includes accommodating for the needs of families, older people, people with disabilities, service families, people wishing to build their own homes and students.

4.14 Development proposals will be expected to contribute to meeting identified housing needs by having regard to the housing type and size mix as set out in the Strategic Housing Market Assessment or any similar evidence for market and affordable units.

4.15 A flexible housing stock will help meet the wide range of accommodation needs so the Council will expect all new homes to be flexible, accessible, adaptable and age friendly. New homes should support the changing needs of individuals and families at different stages of life. National Planning Policy requires local planning authorities to plan for a mix of housing, taking account of local demographic trends, market trends and the needs of different groups of the community. Local planning authorities should identify the size, type, tenure and range of housing that is required in their area.

4.16 This policy allows a level of flexibility to ensure that development can meet housing needs as they change.

See attached document for full rep.

**Question 6:** You can upload any modifications below.

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<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/617231/PDF/-/GFS%2DSPS%2DAR%2D00%2D01%2D2%5F1%20Redacted%20Existing%20Site%20Plan%20%2D%20Diocese%20of%20London%2Epdf>

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Diocese of London (42272161)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128204</b>	
<b>Policy / Evidence Base / Part of Plan: HS1/012 (Land East of Upper Halliford, Nursery Road)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: We consider that the Local Plan is broadly sound and welcome the Council's ambition and approach to meeting its housing need.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
<p>The Land East of Upper Halliford Road has been allocated for removal from the Green Belt to deliver approximately 60 dwellings on the northern parcel and a sixth form college on the southern parcel.</p> <p>These representations have been prepared on behalf of Diocese of London in relation to the Land East of Upper Halliford Road, TW16 6LX. A site location plan of our client's holding is attached at Appendix A1. The land has been allocated in two separate allocations identified as the northern site and southern site.</p> <p>Policy HS1/012: Land East of Upper Halliford, Nursery (northern site)</p>	



4.17 Firstly, we would like to set out that we support the allocation. As part of the promotion of the site, we have previously indicated that this is a sustainable site, with good public transport links. Its only constraint is its Green Belt location and the release from this would only give rise to limited harm. The site can provide a range of housing types to meet the needs of the District. Further detail on the justification for the allocation and our commentary on this is provided below.

#### Green Belt

4.18 The site is currently situated in the Green Belt. As set out in the NPPF, Green Belt boundaries should be altered where “exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans” (para 140).

4.19 It is important to note that the Green Belt covers a significant portion of Spelthorne and there are limited greenfield options within the Borough which are not covered by a Green Belt designation. It is clear that without Green Belt release the Council can deliver enough land to meet its housing need. This is highlighted from a variety of sources.

4.20 As set out in the Statement of Five Year Housing Land Supply (April 2021), Spelthorne currently have a 4.5 year housing land supply which is a deficit of 403 dwellings over a 5 year period. Furthermore, Spelthorne achieved 69% in the Housing Delivery Test (2021) triggering the presumption in favour of sustainable development. Evidentially, Spelthorne has struggled to meet housing requirements in recent years when relying on land solely within the existing settlement boundary (and outside of the Green Belt). The Plan calls for the release of 0.7% of the existing Green Belt area and this is justified by well-established ‘exceptional circumstances’ In this instance, this is the provision of housing to meet an established need that cannot be met through the provision of brownfield land alone.

4.21 As set out above, the Green Belt Assessment (Stage 3) determined that the site was ‘moderately performing / partly less important’. It would therefore be reasonable and justifiable for this site to come forward as a Green Belt release.

#### Density

4.22 The allocation currently sets out that the site is capable of delivering approximately 60 dwellings.

4.23 Firstly, we would recommend avoiding using terms such as approximately. Policy allocations should be clear and justified.

4.24 Following extensive engagement with Spelthorne, we have demonstrated that the site is capable of comfortably delivering 66 units. We would therefore recommend amending this to state that is suitable to deliver up to 70 dwellings.

4.25 The number of homes delivered is likely to fluctuate significantly across the allocations and in particular across larger allocations. It is therefore important to account for this throughout policy. Furthermore, a higher density on the site is in line with paragraph 124 of the NPPF which requires development that makes efficient use of land.

#### Open Space

4.26 As it stands, the policy makes reference to open space provision on site. However, further clarity on this should be provided. The site is too small to provide a large area of open space and it would be unreasonable to require this in policy terms. It does not appear to have been requested on other sites of a similar size.

4.27 As such we consider that this part of the wording is unsound and should be removed.

#### Site Specific Requirements

##### Access

4.28 It is worth highlighting that the access has been through extensive engagement with the County Council's Highways Team and has been discussed in detail at pre-application stage. These discussions confirmed that the new road would deliver a safe and suitable access.

4.29 The allocation also provides the opportunity to deliver an improved vehicular and pedestrian access to Bishop Wand School. The policy allocation currently states "the provision of a new vehicular and pedestrian access road through the site from Upper Halliford Road to the Bishop Wand School". We fully support the inclusion of this access road as it will help to create a permeable and accessible public realm which will also encourage sustainable transport options for those attending Bishop Wand School. This is reinforced in the Sustainability Appraisal.

4.30 It is important that the deliverability of the road can stand up to scrutiny at public examination. The new access sits across two separate allocations that have been identified to come forward at separate time frames.

4.31 The northern site will deliver the access road up to the boundary when this is built out and this is a requirement of the contract with the housebuilder who will deliver the site. The land required for the remaining portion of the access road is on land controlled by the LDF and thus there is no barrier to its delivery.

##### Sixth Form Provision

4.32 The site allocation makes reference to the delivery of a sixth form development. We believe this text has been left in the allocation as an error as this allocation is for residential development and the sixth form college relates to the southern site. We therefore recommend that the following sentence is removed from the policy wording. "Surrey County Council as the education provider support additional sixth form development, subject to the supply of specific types of provision. This is to be agreed with the Council as part of the application process."

##### Landscape Buffers

4.33 The site now has a developer attached who has confirmed they are comfortable that a high quality proposal can come forward to deliver high quality landscaping and a suitable new Green Belt boundary.

A large document has been submitted, please refer to attached document for in depth rep.

**Question 6:** You can upload any modifications below.

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<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/617241/PDF/-/220912%20Halliford%20Reps%20Final%20Redacted%20%2D%20Diocese%20of%20London%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Diocese of London (42272161)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128617</b>	
<b>Policy / Evidence Base / Part of Plan: HS1/012b (Land East of Upper Halliford Road)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>Policy HS1/012b: Land East of Upper Halliford, Nursery Road (southern site)</p> <p>4.34 First, we wholly welcome this allocation. Spelthorne has very limited sixth form and further education capacity, which is some way short of meeting the needs of its residents. We calculate that there are around just 55 places across the district to service a total population of 100,000.</p> <p>4.35 The emerging Local Plan will seek to address significant housing growth, further increasing the demand for further education.</p> <p>4.36 While these proposals are not reliant on the delivery of draft allocation HS1/012 to the north and should be seen as separate proposals. It is in a sustainable location, close to an existing secondary school and would provide high quality teaching accommodation for an overlooked group within the District. The LDF have also engaged with Bishops Wand School to explore the potential to expand its facilities on the southern site. While the school has existing plans to expand in the short-term, they forecast a need to grow further in the medium term to accommodate additional school places</p> <p>4.37 Demand for places in London’s secondary schools has begun to rise in recent years as large cohorts of children move from primary into secondary and sixth form education. Demand is anticipated to rise significantly in the short-term with an additional 78 thousand secondary places required by 2024. Following the peak in 2024, demand will ease somewhat as the lower birth rates of recent years impact on secondary-age population. Projecting demand</p>	

for school places is a particularly challenging task. At the primary level, demand is closely tied to birth rates and sudden changes in patterns or breaks from historic trends require almost immediate assessment and response. At the secondary level, demand is complicated by high levels of cross-border movement – when a child moves across a ward or borough boundary to attend school. At secondary level, 81 per cent of children attended a school outside their ward of residence in 2017.

4.38 Data provided by the Office for National Statistics shows that births in Spelthorne have fluctuated for some years, reaching a low point in 2002. Since that time, births have consistently increased. In the calendar year of 2013, where births fell overall in Surrey, Spelthorne was one of the only boroughs to see a large increase in its birth numbers and have continued their upward trajectory since 2016.

4.39 As a consequence of the forecasted increase in birth rates, Spelthorne will continue to see a need for increase in primary provision, as highlighted above. This will have a resultant knock on effect through secondary and sixth form schooling.

4.40 By locating the new Sixth Form College within an existing educational cluster, the college could forge close links to the existing schools who may not be able to expand their sixth form provision independently.

4.41 The Bishop Wand School is located immediately to the east of and adjoining the subject site and is mainly held within the same ownership, namely The Diocese of London. The overall school demesne is actually split into two differing interests with the main school in the direct ownership of the London Diocesan Board of schools whereas the sports field is owned freehold by Surrey County Council and let to the LDBS on a 125-year ground lease granted in August 2012.

4.42 Given the above information and factors we conclude that a new sixth form college provision to create a Four Form Entry to cover each of the two years of sixth form education is eminently sensible and necessary to meet shortfall of places through the 2020-2030 timescale. This would provide 240 spaces.

4.43 As demonstrated above, there is a demonstrable need for education provision in Spelthorne. The opportunity to provide a new sixth form college with a sustainable new access to Bishop Wand and provides exceptional circumstances to justify removing the site from the Green Belt.

A large document has been submitted, please see attached documents for further in depth rep.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Jean Loveday (41434305)</b>
<b>Organisation:</b>

<b>Response ID: 1112253</b>
<b>Policy / Evidence Base / Part of Plan: Policy SP1: Staines-upon-Thames</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Having read the latest Council bulletin outlining the proposed development of Staines town centre, I have deep concerns about how 'respecting character' will be interpreted. If it is to build endless modern high rise flats 8-14 storeys, similar to the ones already installed at London Square, High Street then I, like a lot of local residents, fail to understand how this architectural style and height of build can contribute to any character for the town. The street-facing façade is ugly and too dominant. If this is a future template then it is a depressing prospect. The proposed level of new housing over the coming years is staggering. Where is the parking for all these new homes? It is naïve to think that residents will be giving up their cars in favour of public transport and most households average 2 cars. There is also no mention of how the town centre and local roads will cope with all the extra traffic? Staines Bridge/Bridge Street is already a bottle-neck and road widening at key entry points does not seem feasible. Also of concern is how a substantially increased number of residents will be supported by community infrastructure such as schools and health

care. It's not all about shops and restaurants! Whilst I appreciate the necessity to provide more housing, surely other areas in Spelthorne could be considered to reduce the impact on Staines?

The Thames is our greatest asset and it is imperative that the Riverside Protection zone is respected. No tall buildings should be visible from the towpath opposite and I would hope this has already been considered.

The zoning drawing does not help residents to visualise the scale of the plan and all the individual housing sites. A scaled 3-D model should be produced, available to view at the Council offices along with the supplementary Framework document, which clearly shows the layout and heights. Perhaps this is already on display?

I am a life-long Spelthorne resident and have seen much change over the years. Careful, considered modernisation can be refreshing but not at the expense of our heritage. It beggars belief that historically iconic buildings such as Spelthorne College (frontage) and the White House have been lost, only to be replaced by unattractive towering blocks of concrete. It is imperative that decisions taken in haste now are not regretted in years to come.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Anders Lundkvist (41641025)</b>
<b>Organisation:</b>

<b>Response ID: 1123788</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Regarding the green in Catherine Drive. I purchased the house here mainly because of the rather large green in the cul de sac. Our children have grown up here and it is a very safe area for them to play on. Their friends are also coming here from the surrounding areas as it is a much safer area to play on than any of the surrounding streets like e.g. Green Lane. Even though we are outgrowing our house. Finding a larger house with an equally safe area for our children is proving quite challenging. So in essence we very much appreciate the green in its current state and would love to see it protected from any kind of future development.
<b>Question 6:</b> You can upload any modifications below.
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Tom Lunn (42010817)</b>
<b>Organisation:</b>

<b>Response ID: 1124613</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Green Belts were created with the aim of halting the incessant encroachment of urbanisation onto our precious green open spaces and countryside (which are constantly under attack from developers, often in league with corrupt local and national politicians) and with aim of providing us with visual, auditory, sensory and physical relief from the urban and suburban environment. Accordingly, I call on Spelthorne Council not to steal our Green Belt land from us under the bogus and ridiculous claim that there are “exceptional circumstances” to justify its release, but to respect its boundaries, as other councils, such as Elmbridge, have done. I categorically refute the Council’s classification of certain Green belt areas as “weakly performing” as I do the bogus criteria invented to justify such classification.

I wish to express my great disappointment that Spelthorne Council has also (unsurprisingly) refused to designate 19 Green Belt areas that were proposed by residents as Local Green spaces and I demand that the Council reverse that refusal.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ray Mackenzie (41225473)</b>
<b>Organisation:</b>

<b>Response ID: 1111832</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
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Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
<p>LOCALGREEN SPACE: SUNBURY COMMON: CATHERINE DRIVE</p> <p>I understand recently the Green at the end of Catherine Drive was sold at auction .</p> <p>My concern is that this is the only piece of Green Space in our road</p> <p>In the thirty odd years this has always been a space used by residents for informal gatherings</p> <p>A regular safe space for children of residents to play</p> <p>Plus just a nice area to walk to with all the trees etc</p> <p>Therefore I feel the green should remain open for current residents and future residents to use and enjoy</p> <p>And not be spoilt for private gains</p>

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Donald MacRae (41904737)</b>
<b>Organisation:</b>

<b>Response ID: 1115652</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
The green space in Queens Walk is a welcome green space for children to play Walk your dog, which is a great for older people to take their pet as it's not far to walk. Also it is a ideal space to hold functions like the Queens Jubilee. To build houses on the green space would be a huge mistake, which I would fully object too.
<b>Question 6:</b> You can upload any modifications below.
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Paul Manning (41994209)</b>
<b>Organisation:</b>

<b>Response ID: 1117342</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Local Green Space Ashford Common Dingle Road Please bear in mind that this area of grass and trees contributes to our outlook and sense of tranquility within the road. Families with Young children are starting to move into this road and at times are seen to play within this area as opposed to on the road .
<b>Question 6:</b> You can upload any modifications below.
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ben Mansell (42097793)</b>
<b>Organisation:</b>

<b>Response ID: 1119407</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
LGS: Ashford Town: Brooklands site I would like to support the local green space plan in Ashford: Brooklands site. I live in one of the new build houses in Pike Crescent and would like to protect this area undoubtedly. My family moved into the house when the site opened and have been there 2 years now. We use the park and green space next to it everyday. My children play there on the way back from school everyday and we take them out for bike rides around the field most days also. This green area has been a great way of creating a community on the estate where we regularly meet with people from various flats and houses with our kids and come together which really makes all of the children become friends and gives them so much joy having friends they can meet up with so close to home. We have been to various birthdays and parties for the jubilee and even fitness sessions from the local gym on this green. This really makes so much enjoyment to so

many people having such a close space where all people from all corners of the Brooklands site can come together and make friendships and provide a community within which is great for everyone and especially all the kids, to build their confidence in so many ways. If this area was to be developed on it would completely ruin the community that has been building and growing and helping the future of our next generations. There would be nowhere to meet with people and enjoyment for anybody who actually lives there and a lot of people would look to move away from somewhere where they have decided to completely ignore the peoples lives that would be effected and feel lied to when the estate was made, just for a company to earn some quick money and overcrowd it. It would become overcrowded with people and cars with nowhere to walk dogs, meet up, play, walk and enjoy some peace of hood community events. When I chose to move to this site this was all a big part of the reason because there was this area provided for these reasons which it is being used for and everybody is gaining from. It would totally deflate living there and really ruin many peoples lives as everybody needs somewhere like this for the sake of their mental health.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Paul Marlow (19780897)</b>	
<b>Organisation:</b>	
<b>Response ID: 1124063</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>Kempton Park should not be repurposed for housing:-</p> <ul style="list-style-type: none"> <li>* This will destroy a vital section of Green Belt – to inhibit urban sprawl, prevent merging of Sunbury &amp; Hampton towns into one another.</li> <li>* Building will increase the traffic load on the A308 Staines Road East, especially the pinch points at Sunbury Cross, Hampton, and the Hampton Court roundabout. Traffic frequently backs up from Kenton Avenue Sunbury to St Mary’s Church Hampton on weekdays at peak times and later.</li> <li>* A housing development will impose an additional strain on the local Sunbury Health Centre which cannot cope in both its existing accommodation and offering of health services. The same goes for the local education establishments.</li> <li>* Within the local plan is to remove some of the Tesco Extra car park to repurpose for housing which will make parking difficult at times. Building on Kempton will dramatically increase the number of vehicles using Tesco.</li> <li>* It will permanently and negatively change the character of areas surrounding the estate.</li> </ul>	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: 1934 Kenneth Marshall (19657665)</b>
<b>Organisation:</b>

<b>Response ID: 1110235</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
HAVING READ THE CRITERION I BELIEVE THE COUNCIL HAS LEGALLY COMPLIED AND PRODUCED A SOUND PLAN. I AM NOT A LAWYER
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
SEE COMMENT IN 4 ABOVE
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: NOT APPLICABLE





<b>Respondent: Mrs Michelle Marshall (33734369)</b>	
<b>Organisation:</b>	
<b>Response ID: 1107727</b>	
<b>Policy / Evidence Base / Part of Plan:</b> General comment - consultation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: very unlikely. Explain why Staines has been chosen. who made these decisions.	Additional Comments: very unlikely. Explain why Staines has been chosen. who made these decisions.
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: * No * Have not considered the residents of Staines	Additional Comments: No Have not considered the residents of Staines
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No as have made these plans but have not consulted or considered the residents in Staines	Additional Comments: No as have made these plans but have not consulted or considered the residents in Staines
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No idea but not likely to be adequate. This is too complicated to follow Residents feel scammed by the Council	

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr and Mrs Niall Marshall (42037505)</b>	
<b>Organisation:</b>	
<b>Response ID: 1125961</b>	
<b>Policy / Evidence Base / Part of Plan: Policy SP4: Green Belt</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Also I believe this field is helping towards the eco system and keeping conservation in mind i feel the residents that back onto the field should be able to work with the local council on planting non invasive species, from shrubs, flowering plants, fruit trees and even a small vegetable patches to benefit the community, help children to connect with there surroundings and there food. But more so to invite more bees, insects, birds, hedgehogs and all things bright and beautiful. I feel all local green spaces should have some bio diversity including native plants, wild flower areas and places for food to grow instead of flat grass lands with no grazing animals and more effort for manual maintenance.	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr and Mrs Niall Marshall (42037505)</b>
<b>Organisation:</b>

<b>Response ID: 1125960</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I'm responding to a letter that we've recently received regarding "local green spaces" including the field at rear of our home. We would strongly disagree with any developers trying to turn our local green space into more properties for there portfolio. This area is used by many dog walkers including us. There is always some kids out there playing with the comfort of being safe in the community surrounding the field. Recently one of the residents made huge efforts to organise the queens jubilee party which brought so many locals together, and we all had a fantastic day.
<b>Question 6:</b> You can upload any modifications below.
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Sandra Marshall (41994113)</b>
<b>Organisation:</b>

<b>Response ID: 1124607</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I strongly object to the release of green belt in spelthorne. This area is already over populated and cannot take further strain on its infrastructure. We need green spaces for the environment and our mental health.
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Ms Hilary Matthews (33776545)</b>
<b>Organisation:</b>

<b>Response ID: 1124609</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I do not want the Council to reduce the Green belt in Spelthorne’s new Local Plan; I want to: (1) Call on the Council not to amend existing Green Belt boundaries but to respect them, (2) Call on the Council not to make a pro-active case for Green belt release in its draft Local Plan and not to declare that there are “exceptional circumstances” to justify Green Belt release. (3) State that I categorically reject the Council’s classification of certain Green belt areas as “weakly performing” as well as the criteria invented to justify such classification. All Green Belt sites perform one or more important function by merely existing including checking the unrestricted sprawl of large built up areas, preventing neighbouring towns from merging into one another, assisting in safeguarding the countryside from encroachment, preserving the setting and special character of historic towns; and – extremely importantly - assisting in urban regeneration, by encouraging the recycling of derelict

and other urban land (para.138 of the National Planning Policy Framework). All Green Belt is of considerable importance, is valued by residents and should remain protected.

(4) Express my disappointment that the Council has also refused to designate 19 Green Belt areas (that were proposed by residents) as Local Green spaces and ask the Council to reverse this refusal.

STOP TRYING TO RUIN OUR TOWN AND SURROUNDING AREAS ...

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: John Maxen (19721985)</b>	
<b>Organisation:</b>	
<b>Response ID: 1124636</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
We are writing to strongly support Spelthorne’s position that the lands mentioned below should remain Green Belt and that NO development whatsoever should be allowed on them.	
1.Stratton Road Green Belt Reasons: Stratton Road piece of land is a major part of the Green Belt separating the communities of Sunbury and Halliford. This role of separating communities to stop them merging is a prime Green Belt function. The land has a rural feel appreciated by the surrounding houses and acts as a ‘green lung’ for the community.	
2. Running Horse (Groveley Road)	

It is a major part of Green Belt separating the communities of Sunbury and Feltham. This role of separating communities to stop them merging is a prime Green Belt function. The site is contiguous and unbroken with no boundaries between Sunbury and Feltham. As such, it strongly performs this prime function.

The land has often been used for crops, and when not cropped produces a great display of wildflowers in the summer. Sunbury Common is the most densely developed part of Sunbury, and this display is a welcome contribution to the environment. In addition, it is widely understood that the land is contaminated. The site has been secured, but any disturbance could put the whole site and possibly the greater community at risk. I cannot believe that anyone would want to risk this.

Protecting Green Belt is partly to encourage better use of Brown field sites. Sunbury is really doing its share on supplying brownfield sites especially around the Cross. In addition, Spelthorne has been forced to recommend release of some smaller Green belt sites, to meet housing numbers, but the effect of that is to save us from having to release larger sites like this.

Again, Sunbury is making a major contribution to this release. Most crucially of all, Spelthorne has met its housing target without the release of this site, so the case to say it must be released does not stack up. Spelthorne is absolutely right not to recommend release this site and I fully support that.

### 3.Kempton

Reasons:

The land fulfils many of the purposes of Green Belt separating the settlements of Sunbury and Hampton.

Both are historic Domesday settlements, except Kempton (Kenyngton or Chennestone) was then separate from Sunbury. Due west of the site, the settlement is heavily urbanised culminating in the high densities of Sunbury Cross. Hampton lacks the same urban heart but is otherwise very heavily urbanised. They are distinctly separate settlements with the border between them originally being part of the border between two 'Hundreds' Hampton being in the (then) the Hundreds of Hounslow rather than in Spelthorne. Currently, the border between the two is the border between London and Surrey, a very major boundary. So, Kempton Park Green Belt separates not just two communities but two regions.

On the Northern Boundary is a heronry that is part of the 'Southwest London Water Bodies' Ramsar site. As such it has world recognition for its contribution to waterfowl preservation. Even if this part of the site was not built on, any urban intensification in the area can only be very harmful.

As part of its proposal to meet housing needs, Spelthorne is proposing the release of a few smaller Green Belt sites for housing. A third of all those sites are in Sunbury, add to that the further proposed intensification of development around Sunbury Cross and the area is already making a significant contribution to meeting housing needs. But those proposals mean we do not have to even contemplate releasing such significant sites as this either in whole or in part.

Please find the attached detailed submission(s) for the submission contains location, reasons and contact details.

I would also like to take the opportunity to thank you for all your hard work on the local plan, this is appreciated by the residents of Spelthorne.

**Question 6:** You can upload any modifications below.

Local Plan Green Belt -Submission Kempton Park.docx

<https://spelthorne.inconsult.uk/gf2.ti/af/1409506/618962/DOCX/-/Local%20Plan%20Green%20Belt%20Submission%20Kempton%20Park%20-%20Redact.docx>

Local Plan Green Belt -Submission Running Horse *Groveley Road.docx*

[https://spelthorne.inconsult.uk/gf2.ti/af/1409506/618963/DOCX/-/Local%20Plan%20Green%20Belt%20Submission%20Running%20Horse%20\\_Groveley%20Road%20-%20Redacted.docx](https://spelthorne.inconsult.uk/gf2.ti/af/1409506/618963/DOCX/-/Local%20Plan%20Green%20Belt%20Submission%20Running%20Horse%20_Groveley%20Road%20-%20Redacted.docx)

Local Plan Green Belt -Submission Stratton Road.docx

<https://spelthorne.inconsult.uk/gf2.ti/af/1409506/618964/DOCX/-/Local%20Plan%20Green%20Belt%20Submission%20Stratton%20Road%20-%20reacted.docx>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: John Maxen (19721985)</b>	
<b>Organisation:</b>	
<b>Response ID: 1119412</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Please find the attached detailed submission for Local Green Space, the submission contains location map, photo, reason and contact details. This location is critical to be protected, and is highly valued by local residents. I would also like to take the opportunity to thank you for all your hard work on the local plan, this is appreciated by the residents of Spelthorne.	
<b>Question 6:</b> You can upload any modifications below.	
LGS- HSW - Upper Halli Rd TW17 2209p_Redacted.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619738/PDF/-/LGS%2D%20HSW%20%2D%20Upper%20Halli%20Rd%20TW17%202209p%5FRedacted%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619738/PDF/-/LGS%2D%20HSW%20%2D%20Upper%20Halli%20Rd%20TW17%202209p%5FRedacted%2Epdf</a>	

LGS - HSW - Falcon TW16 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619739/PDF/-/LGS%20%2D%20HSW%20%2D%20Falcon%20TW16%202209p%5FRedacted%2Epdf>

LGS - SunE - Kenton Avenue TW16 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619740/PDF/-/LGS%20%2D%20SunE%20%2D%20Kenton%20Avenue%20TW16%202209p%5FRedacted%2Epdf>

LGS HSW Upper Halliford Green 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619741/PDF/-/LGS%20HSW%20Upper%20Halliford%20Green%202209p%5FRedacted%2Epdf>

LGS - SunE - Hamilton Place TW16 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619742/PDF/-/LGS%20%2D%20SunE%20%2D%20Hamilton%20Place%20TW16%202209p%5FRedacted%2Epdf>

LGS - SunE - Montford Rd TW16 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619743/PDF/-/LGS%20%2D%20SunE%20%2D%20Montford%20Rd%20TW16%202209p%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Karen Mazzon (42010689)</b>
<b>Organisation:</b>

<b>Response ID: 1124612</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
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No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I strongly object to anymore loss of our vital green belt land. Spelthorne is already in a very high polluted area surrounded by M25, M3, Heathrow Airport, Walton Bridge Road Bridge it would appear Spelthorne is becoming the dumping ground for mass infrastructure (the dump in Shepperton massive chimney for one example). Green Belt is a Lung and any erosion of this for monetary gain over health should not be entertained.
<b>Question 6:</b> You can upload any modifications below.
No Response



**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr James McConnell (41898145)</b>
<b>Organisation:</b>

<b>Response ID: 1122460</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
These representations to the Pre-Submission Spelthorne Local Plan 2022-2037 (The Plan) have been prepared on behalf of Bellway Homes who have an interest in Land East of Upper Halliford Road, TW16 6JW. This land is identified in The Plan as site HS1/012 and has been allocated for a residential development of approximately 60 units together with open space provision. To facilitate the site’s allocation for residential development within the emerging Local Plan, the site is proposed for removal from the Green Belt. 2. Commentary on The Plan Policy ST2/Para 3.2 Bellway supports the housing target of 9,270 homes that are to be delivered over the plan period at an annual rate of 618 homes and that this is implied as a minimum target by reference in Policy ST2 to ‘at least 9,270 new homes’. Para 3.3

Bellway supports the recognition that meeting housing target of 9,270 homes will require the release of Green Belt land. This approach is consistent with para 140 of the National Planning Policy Framework (NPPF), which states that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully justified, through the preparation or updating of plans.

Bellway believes that the spatial strategy of the Plan has the correct balance of focusing upon development opportunities in Staines-Upon-Thames supported by a small loss of Green Belt and that this small loss of Green Belt will not cause significant harm to the integrity of the Green Belt. This will also ensure that there will be a balanced supply of new housing stock, allowing for a more even supply of flats and houses, whilst also facilitating a more consistent supply in housing delivery as a number of sites proposed for removal from the Green Belt can be delivered early on in the Plan period.

Table A1/7 of the 2021 Annual Monitoring Report identifies that housing delivery in Spelthorne has averaged 331 units from 2012/13 – 2020/21, albeit against a much lower housing target set in the Spelthorne Core Strategy and Policies DPD (2009), whilst the 2021 Housing Delivery Test shows a delivery rate of 69% with housing target figures at a lower level than those prescribed in the Plan.

The housing target prescribed in the Plan will therefore require a step change in housing delivery in Spelthorne that will need to be maintained in the long-term. This also emphasises the importance of the Plan being adopted at the earliest opportunity, to enable those sites allocated within the first phase of the plan period to come forward for development quickly so that the annual housing target can be met from the beginning of the plan period.

The previous Site Allocations DPD dates back to 2009 and it is notable that of the 11 sites allocated in that DPD only 3 have been delivered, providing 205 units with 419 outstanding units not delivered on the 8 remaining sites. This emphasises that even allowing for a 5% under delivery is very challenging and supports the rationale for all of those sites allocated in the Plan to be retained to ensure that the required housing numbers are delivered.

Caution is also expressed on the potential supply of windfall housing from office conversions. The new Class MA of the Town and Country Planning (General Permitted Development) Order 2021 has introduced additional restrictions to the circumstances where this would have previously been permitted development, for example the restriction on size to 1500 square metres, and this will have an impact upon the viability of such conversions, in particular through the need to provide affordable housing as part of a proposed conversion.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr James McConnell (41898145)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122461</b>	
<b>Policy / Evidence Base / Part of Plan: HS1/009 (Bugle Nurseries, Upper Halliford Road)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
<p>Policy HS1/012: Land East of Upper Halliford, Nursery (northern site)</p> <p>Bellway support this site allocation in full.</p> <p>This site allocation concerns land that is currently in the Green Belt. The table on page 10 of The Plan identifies that 829 homes will be delivered from sites that are currently within the Green Belt.</p> <p>It is noted that the Council has undertaken a Green Belt Assessment Stage 3 Report (GBA) to determine which areas are weakly performing and could be released from the Green Belt in order to ensure that sufficient land can come forward to deliver the prescribed housing target.</p> <p>The GBA included a 3 stage process. Stage 1 was published by Arup in February 2018, Stage 2 published in December 2018 with the GBA Stage 3 Report being the current assessment that was published by the Council in July 2022.</p>	

The individual site assessment within the GBA is based upon four of the five purposes identified in para 138 of the NPPF that the Green Belt serves:

- To check the unrestricted sprawl of large built-up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns

The Stage 3 report lists the outcome of each stage of the site assessment as either weakly performing, moderately performing or strongly performing against these four purposes.

A final rating provided within a header entitled 'Role in strategic function', which is an additional qualitative assessment undertaken to identify the role the individual parcels play in the overall performance of the wider Green Belt, classified as either important, partly less important or less important.

The GBA identifies site HS1/012 as having a Moderately Performing rating for the Overall Performance against the four purposes and a Partly Less Important rating for the Strategic Importance.

The Role in Strategic Function for site HS1/012 (GBA p8-9) is set out below:

"It is considered that if the parcel was released in isolation it would have a very (?) impact on the performance of the wider Green Belt (there appears to be some text missing from this sentence). It is noted however, that while this parcel, as a result of its position towards the north of the strategic gap and sense of enclosure plays only a limited role in relation to the merging of settlements, if the parcel is released in combination with parcel HS1/012b to the south and HS1/009 to the east. As such, there would be both a reduction in both physical and perceptual separation between Ashford/Sunbury-on-Thames/ Stanwell and Upper Halliford. Overall, it is considered that while the release of this parcel would not harm performance of the wider Green Belt, release in combination with HS1/12b and HS1/009 would result in a degree of harm to wider Green Belt function".

Bellway consider that this conclusion is overstating the strategic importance of this site in terms of delivering the purposes of the Green Belt with regards to preventing neighbouring towns merging into one another. In particular the reference to this site and the site allocations immediately adjacent (Ref HS1/009 Bugle Nurseries and HS1/013 Land east of Upper Halliford Road (site B)) leading to a reduction in both physical and perceptual separation between Ashford/Sunbury-on-Thames/ Stanwell and Upper Halliford is contested.

These four settlements listed are not considered to be clearly identifiable urban settlements with distinctive boundaries, so it is not clear in the first instance, which settlements would have a reduced physical and perceptual separation as a result of the development of this land. Furthermore, the land is not considered to be of sufficient scale to have a significant impact in terms of urban containment.

The development of this land would fit neatly into the centre of a wider, albeit modest sized area that is in itself well -contained, being bound by land to the west of the A244 Upper Halliford Road, Nursery Road to the north, residential development and The Bishop Wand School to the east and open space to the south. There are some more distinctive features nearby that can be seen to serve a greater function in terms of urban containment/separation, such as the railway line to the west of Upper Halliford Road and land further south including the London Irish Rugby Club whilst the M3 is likely to have a greater role in the perception of defining urban areas.

The development of this site (and the adjoining sites) will not have any impact upon urban sprawl as the site sits within a wider built-up urban area and will not result in encroachment into the countryside.

On this basis, it is considered that the site can be brought forward for residential development whilst having very little impact on the purposes of the Green Belt so that the proposed site allocation is fully justified.

Notwithstanding the prevailing Green Belt status of the land, it is worth emphasising that the site benefits from a very sustainable location with Upper Halliford railway station within 5 minutes walking distance to the north of the site where there are regular trains connecting into London in 50 minutes, primary and secondary schools are within 5 minutes walking distance of the site, Sunbury Leisure Centre is within 10 minutes walking distance of the site and there are an array of facilities in the surrounding urban area to meet every day needs, many of which can be accessed by foot or bicycle. This connectivity also emphasises the built-up nature of the immediate area.

The site is currently vacant and whilst predominantly a green field site, it is not used for agricultural purposes and has no Agricultural Land Classification. The site has no heritage or archaeological constraints and it does not have any nature conservation designations. The site is within Flood Zone 1 with a low probability of flooding. The land is essentially flat so that the topography poses no constraint to residential development. Trees/ are present around the perimeter of the site and the layout has been designed to work with this situation. It is understood that Surrey County Council highways are supportive of the access arrangements into the site.

Bellway Homes have now entered into an option agreement to acquire the land for residential development and so have a legal interest in the site. This option agreement covers the first five years of The Plan (even if the plan period slips a year or two). There are no known legal or ownership impediments that would impinge on the residential development of this land and there are no ransom strips or unresolved ownerships.

The delivery timeframe of 2023-2027 is therefore fully supported. Once the site has been confirmed as a housing development site then a planning application can be prepared and submitted immediately. Bellway has recently sought pre-application planning advice from the Council for the residential development of this site and the advice. The Council, whilst emphasising that the adoption of The Plan would instigate the release of the land from the Green Belt, was generally supportive of the proposed layout. This advice was sought to ensure that Bellway is in a position to submit a planning application at the earliest opportunity.

The reference in the site allocation to an allocation of approximately 60 units is noted. It should be made clear in the Plan that these site capacity figures are estimates and that there is a degree of flexibility around the number of units that will be delivered from each site allocation. Furthermore, the site layout submitted with the request for pre-application advice included both family homes as well as flats, despite the location of the site within an urban area.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Lucy McGovern (42025249)</b>
<b>Organisation:</b>

<b>Response ID: 1117827</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
LGS : Ashford Town: Brooklands site My name is Lucy McGovern I'm writing concerning the strategic planning, spelthorne council, knowle green staines tw181xb. This land is what brings the community together, we play games with our children here like football and other games. People also walk their dogs on this land. When we have jubilee party's we hold them here. My children have not got a garden so they use this land to get some exercise and run about. There is lots of uses of this land by the whole community it's a really nice place to live with this land to play on.
<b>Question 6:</b> You can upload any modifications below.
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Louise Mcjannet (41905281)</b>
<b>Organisation:</b>

<b>Response ID: 1115667</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
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<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I would like it noted that as a family living in The Wickets for over 17 years. We always use the local green space in The Wickets. It was a big reason for buying a house here. The safe green area has given us the following: The children's play area for a safe space for children to play in. A quiet and peaceful space to sit in. The green space for family sports games. Brief run for the dog.

We had a fantastic jubilee party for the residents here too. Plus meetings for residents are held on the green area too.  
I want to support protecting this Local Green Space.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Rev Andrew McLuskey (33561025)</b>	
<b>Organisation:</b>	
<b>Response ID: 1112331</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy H1: Homes for All	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>MITIGATING FACTORS?</p> <p>I realise that in terms of its Local Plan Spelthorne is caught between the devil and the deep blue sea. As has been acknowledged if we don't accept what seems an unreasonably high level of new dwellings we will risk being swamped with even more skyscrapers. However, can we at least mitigate the effect of having to accept more houses than we really want? We need to make sure that in the final plan -</p> <ol style="list-style-type: none"> <li>1. Conditions are set on those who can buy the new homes . (Many flats already built have been sold overseas for speculators and remain empty.)</li> <li>2. There is a focus on family occupancy, rather than the building of rabbit hutches for workers.</li> <li>3. There will be regeneration of the ecology and environment after the build and during occupation.</li> </ol>	

Also we need to know when the Council will, in addition to the Staines Development Framework, be issuing similar proposals for the other, equally important parts of the borough!

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Ms Patricia Meek (40363393)</b>	
<b>Organisation:</b>	
<b>Response ID: 1112333</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy SP2: Ashford, Shepperton and Sunbury Cross	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>My apologies if this is not the right address, but I don't know where I can protest about all the proposed new flats being built all over Ashford Flats are being built on what I understand to be green belt land and also every other available plot of land. The big estate in Church Road Ashford, the Dobles building and now the land by the tennis courts in Woodthorpe Road are just three examples. I understand that the multi-storey car park is now targeted as well!</p> <p>Ashford cannot deal with any more flats without any of the infrastructure that should accompany them i.e. doctors surgeries, schools etc. it is nigh impossible to see a doctor as it is without many more people in the area. Are there going to be more facilities for all this new housing? I appreciate that people need homes, but Ashford is becoming saturated. Soon we shall have no green spaces left!</p>	

The High St. has become a run down road full of nail bars, hairdressers, charity shops and fast food shops ( with the accompanying rubbish from them). We don't even have a bank now.  
Following on from that, why is it allowed for some shops in the High St. to have their goods strewn across the front of their premises? It is unsightly and adds to the general run down appearance. Cannot the pavements be kept clear?  
Lastly I would complain about the glass shop in the small road where Dobles used to be. Their vans are often parked on the yellow lines there and It is awkward at times for drivers going in or out at that junction. You cannot see the traffic lights without going around the vans, which is hazardous with drivers turning into the road.  
I would be interested in your reply, hoping that there will be very little green (or brown) space used for planned building in the future.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Joe Miller (40150113)</b>	
<b>Organisation:</b>	
<b>Response ID: 1112563</b>	
<b>Policy / Evidence Base / Part of Plan: AT3/016 (23-31 (not 11-19) Woodthorpe Road)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: The proposed development of AT3/016 fails to meet any degree of soundness when proposing a yield of 120 dwelling on an extremely small site surrounded by pre-existing residential properties and a complete lack of high rise properties in the local area. T
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No	Additional Comments: The current proposal fails to meet it's duty to co-operate with respect to provision of homes, infrastructure and health. This is in addition to a complete failure to co-operate with local residents on the intolerable burden of overwhelming development.
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Soundness The proposed development of AT3/016 fails to meet any degree of soundness when proposing a yield of 120 dwelling on an extremely small site surrounded by pre-existing residential properties and a complete lack of high rise properties in the local area. The principles of the Designing Places and Spaces content clearly set out that "Proposals for new development should demonstrate that they will achieve a satisfactory relationship to adjoining properties avoiding adverse and un-neighbourly impacts in terms of loss of privacy, daylight or sunlight, or	

overbearing effect due to bulk and proximity or outlook.”. The proposal for this site fails in its entirety to seek to adverse impacts on all the above elements.

In order to meet the proposal, any development above 2/3 storeys would impose an intolerable detriment to my own property’s privacy, access to light and the impact of overbearing bulk and proximity. This would be the case for all at The Foundry. In addition there is no provision to understand how traffic and parking measures would ensure that the local area becomes immovable due to the significant increase in traffic.

Moreover, the impact on travel, medical access and other services already under strain from other significant local development is unaddressed.

Furthermore, the proposal would require development of significant size and scale that would be completely out of keeping with the local area and immediate surroundings.

I fail to see how the proposal in it’s current form could meet the test necessary for satisfactory and sound local outcomes.

Should legitimate consultation take place, some development may be possible that reduces the scope to a vastly decreased number of dwellings, limits the height of the building to maximum 3 storeys, as well as considers the impact on privacy of any proposed frontage. I would be supportive of some developers but limited far below the current suggestions of 120 dwellings. For reference, the Foundry occupies a directly comparable land size and contains 26 dwellings, not 120.

The above points demonstrate that the proposal fails to adhere to the tests; of effectiveness, both in terms of development numbers and impact; justification on the reasonable alternatives of scale, design and proportionality; and policy whereby the proposal would be incompatible with National Policy on sustainable development and urban areas.

Duty to Co-operate

The current proposal fails to meet it’s duty to co-operate with respect to provision of homes, infrastructure and health. This is in addition to a complete failure to co-operate with local residents on the intolerable burden of overwhelming development.

While the proposal makes a suggest of a 120 dwelling yield, it fails to demonstrate how the provision of housing is in keeping with the duty to provide quality new housing but also maintain the quality if existing development, especially that which is already relatively recent. Moreover, given the scale of the proposal, there would be a significant impact on infrastructure and healthcare provision which is already stretched and would face further decline which this development along other mass developments locally along Ashford High Street.

As in my soundness representation, in presenting such an enormous figure for planned development, the plan directly imposes sizeable impacts on cross cutting areas that are not addressed.

In keeping with my view, residential development of a limited scope would not be objectionable and place a lower burden on the above issues. The proposal would also be significantly better served with impact statements on parking, pollution, light and even more importantly digital infrastructure where the nearby area already faces an appalling lack of mobile signal which would be further eroded by large development.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

The single modification that would resolve issues of soundness and co-operation relates to the scale and yield of proposed development. Current yield suggests 120 dwellings when a realistic figure of 50 maximum dwellings with an even more reduced figure when taking into account green space, parking and impact on light and privacy is taken into account. Alongside yield reductions, imposition of limits with regards to scale of development i.e max three storeys, green space and onsite parking would be positive changes.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: The current proposal would have an intolerable burden on my own residence, health and wellbeing alongside those of my fellow Foundry residents. In the absence of a voice of directly impacted individuals the case at hearing would be completely missing direct impact statements.

<b>Respondent: Mr Robert Miller (41829121)</b>
<b>Organisation: O'Connor Properties Ltd</b>

<b>Response ID: 1124649</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Our Consultation Representation (August 2022), fully sets out how the Draft Local Plan is considered to be unsound. The continued inclusion of the site within the Green Belt is considered to be unsound in respect of the plan being unjustified and inconsistent with national planning policy, due to the failure of the Council to consider this site as a reasonable alternative to deliver future employment floorspace through removal of the Green Belt designation. In addition, by promoting similarly poor performing greenfield sites in the vicinity of Stanwell Farm, whilst failing to consider Stanwell Farm, which is previously developed land, the Draft Local Plan would not be consistent with NPPF Paragraph 142 I refer to our detailed consultation response dated August 2022 for more information.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Our consultation representation dated August 2022, sets out how an amendment to the Council's Draft Policies Map to removal Stanwell Farm from the Metropolitan Green Belt would remedy the soundness of the Draft Local Plan in this respect. Stanwell Farm's release would also unlock the most

optimum long term planning use for the Site, with additional employment floorspace contributing to the ascribed employment floorspace demands set out in Draft Local Plan Policy EC1 'Meeting Employment Needs'.  
Please refer to our detailed consultation response dated August 2022 for more information.

**Question 6:** You can upload any modifications below.

FINAL.StanwellFarmRep.RM.230822.pdf

[https://spelthorne.inconsult.uk/gf2.ti/af/1409506/619242/PDF/-/FINAL\\_%20Redacted%20-%20StanwellFarmRep.RM.230822%20-%20Connor%20Properties%20Ltd..pdf](https://spelthorne.inconsult.uk/gf2.ti/af/1409506/619242/PDF/-/FINAL_%20Redacted%20-%20StanwellFarmRep.RM.230822%20-%20Connor%20Properties%20Ltd..pdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: We consider it will be necessary to participate in the hearing sessions to outline the benefits of taking the site out of the Green Belt designation and why it would deliver the key objectives set out by the Council in the Draft Local Plan within the plan period by our client.

<b>Respondent: Councillor Tony Mitchell (19532257)</b>
<b>Organisation: Spelthorne BC Councillor</b>

<b>Response ID: 1117443</b>	
<b>Policy / Evidence Base / Part of Plan: Policy E5: Open Space and Recreation</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Submissions attached for:	
<ul style="list-style-type: none"> <li>• Convent Road</li> <li>• Muncaster Close</li> <li>• Chatten Road</li> <li>• Clockhouse Lane</li> <li>• Clockhouse Roundabout</li> <li>• Feltham Hill Road</li> <li>• Fernhurst Road</li> </ul>	

Please find the attached detailed submissions for Local Green Spaces, each submission contains location map, photo, reason and contact details. These locations are critical to be protected, and are highly valued by local residents. I would also like to take the opportunity to thank you for all your hard work on the local plan, this is appreciated by the residents of Spelthorne.

**Question 6:** You can upload any modifications below.

LDF Convent Road AshE 2209x\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619781/PDF/-/LDF%20Convent%20Road%20AshE%202209x%5FRedacted%2Epdf>

LGS AshE Clockhouse Lane 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619782/PDF/-/LGS%20AshE%20Clockhouse%20Lane%202209p%5FRedacted%2Epdf>

LGS AshE Fernhurst Road 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619783/PDF/-/LGS%20AshE%20Fernhurst%20Road%202209p%5FRedacted%2Epdf>

LGS AshE Clockhouse Roundabout 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619784/PDF/-/LGS%20AshE%20Clockhouse%20Roundabout%202209p%5FRedacted%2Epdf>

LGS AshE Muncaster Close 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619785/PDF/-/LGS%20AshE%20Muncaster%20Close%202209p%5FRedacted%2Epdf>

LGS AshE Chatten Rd 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619786/PDF/-/LGS%20AshE%20Chatten%20Rd%202209p%5FRedacted%2Epdf>

LDF Manor Road AshE 2209x\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619787/PDF/-/LDF%20Manor%20Road%20AshE%202209x%5FRedacted%2Epdf>

LGS AshE Feltham Hill Road 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619788/PDF/-/LGS%20AshE%20Feltham%20Hill%20Road%202209p%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Alan Mockford (25050241)</b>	
<b>Organisation:</b>	
<b>Response ID: 1112054</b>	
<b>Policy / Evidence Base / Part of Plan:</b> General comment - consultation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>This is not a realistic consultation. How on earth are residents expected to respond to this document? Firstly you would need to be highly educated &amp; spend several weeks studying the mass of documentation. Secondly the decision has already been made by the secretary of state. Spelthorne Council has no say in the matter.</p> <p>The Green Belt was designed to prevent urban sprawl. The only realistic consultation would be to ask residents if they wish to maintain the Green Belt or to build on it. However it will make no difference as the decision has already been made by the secretary of state.</p> <p>For what it's worth I am totally opposed to any inappropriate building on the Green Belt &amp; in particular, the prime Green Belt land off Groveley Road &amp; Vicarage Road in Sunbury Common, which marks the boundary of Greater London.</p>	
<b>Question 6:</b> You can upload any modifications below.	

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1125649	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No. Not Justified Not Effective Not Consistent with National Policy
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Chapter 10 -Allocations Point of soundness The 55 site allocations spread across three delivery periods/phases as presented in this chapter have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. We have concerns and therefore consider this plan unsound.	

To overcome this soundness issue, the sites should be re-screened taking into consideration listed constraints and opportunities for each site which we have provided on a spreadsheet. We have provided Spelthorne Borough Council with this spreadsheet, and it contains details regarding the site constraints, requirements, and opportunities to ensure the sustainable deliverability of each site. These details should assist with the re-screening exercise.

We consider the current arrangement does not adequately highlight environmental constraints and address how they can be mitigated to ensure a sustainable delivery of developments in the Borough.

For example, there are a few sites which are near watercourses or has a watercourse running within it, however no information has been provided stating how these watercourses will be protected (such as provision of a buffer zone as a requirement) or enhanced. We have reviewed all sites and provided this information.

About protecting and enhancing water resources, we refer the Local Planning Authority to our response on the Regulation 18 consultation, Local Plan preferred options consultation, (page 6) for the list of waterbodies within the Borough with a summary of the Water Framework Directive issues affecting quality. For sites which have watercourses running within or near them the plan could identify measures that will support improvements to watercourse below good status.

As well, a large amount of the site allocations is located upon Superficial Deposits classed as Principal Aquifers defined as an aquifer that can provide significant quantities of water (both potable and for business needs) and can support water supply and/or baseflow to rivers, lakes, and wetlands on a strategic scale. However, no information has been provided on the previous use of the site which may be a contaminative use and therefore further investigation and remediation of contamination will be required and no information has been provided regarding how these will be protected for certain kinds of development.

Site-specific geology will need to be considered for developments where deep piled foundations are proposed. Should deep foundations penetrate through the London Clay to deeper, more sensitive aquifers, then it is likely that a Foundation Works Risk Assessment (FWRA) would be required to ensure that the risks to groundwater are minimised. It is useful to refer to the Environment Agency's Approach to Groundwater Protection for the types of development proposals that we would object to within a Principal Aquifer. Also, developers can use DEFRA Magic Map to screen site-specific aquifer designations. We have reviewed all sites and provided this information.

Information on how wastewater/effluent/foul water will be sustainably discharged from developments within these sites have also not been provided.

As stated previously (our comments under policy ID1) Spelthorne Borough's 2019 Water Cycle Study shows that all the wastewater flows from the Borough will be going to Mogden Sewage Treatment Works. If this is the case, i.e., based on the most up to date evidence, then this should be mentioned.

Also, information on flood risk has not been provided. For example, the following allocated sites ST1/029, ST1/030, ST4/011 and ST4/002 are confirmed as being in 1 in 20 extent in Appendix B of the Strategic Flood Risk Assessment. The proposed sites are being used for as residential development which is contrary to National Planning Policy Framework and we would object to the proposed development.

In section 2.15, it is stated that to achieve a cleaner and greener lifestyle and tackle the effects of climate change one way is 'Working with the Environment Agency and through the Strategic Flood Risk Assessment, ensure that new development is directed to areas of lowest flood risk. Incorporating the River Thames (Flood Relief) Scheme and other flood mitigation initiatives withing the Plan.' [please note the typo – 'to' has been omitted].

We are pleased Spelthorne Borough Council, acknowledge the need to work with us and we would like to highlight the following.

The current Thames (Hurley to Teddington) 2019 model is undergoing some revisions and amendments. This may have an impact on the representation of flood risk for the borough of Spelthorne. It may affect some of the 55 sites identified within Chapter 10 of the Pre-submission Spelthorne Local Plan, 2022 – 2037: Allocations. The sites which are currently near to or within the Thames (Hurley to Teddington) 2019 modelled extents are:

\* Years 1-5 sites: AT1/002, AT1/012, ST1/037, ST3/004, ST4/002, ST4/019, ST4/025, ST4/026 and ST4/028

\* Years 6-10 sites: RL1/011, SH1/010, ST1/028, ST1/029, ST1/030, ST3/014, ST4/004, ST4/010, ST4/011, ST4/023 and ST4/024

\* Years 11-15 sites: SH1/015, SH2/003, ST1/031, ST2/006, ST3/012 and ST4/009

The River Ash is also being reviewed and there are some sites where there is likely to be some interaction between the two rivers – the Thames and the Ash and hence will impact on some of the allocated sites.

We have assessed the site allocations in chapter 10 based on current data we hold for these sites. Please note any potential changes to the modelling will result in the need to update the Flood Map for Planning. Therefore, Spelthorne Borough Council may also need to review and potentially amend any other supporting documents e.g., Strategic Flood Risk Assessment (SFRA).

The Staines Upon Thames Town Centre Development Framework (Document ref STC001) needs to reflect those amended models which will soon be released (Thames and Ash) and that this may influence the proposed development opportunities referenced in section 7.0 of the document.

Please note that we have not commented on sites within Flood Zone 1 (as shown currently), but Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK ([www.gov.uk](http://www.gov.uk)).

The peak river flow climate change allowances were updated in May 2022. All developments in FZ2 and 3 should assess and design to the central allowance apart from essential infrastructure, which should use the higher central allowance. The most up-to-date climate change allowances should be used in the Local Plan and SFRA. More details available here: Flood risk assessments: climate change allowances - GOV.UK ([www.gov.uk](http://www.gov.uk)).

**Question 6:** You can upload any modifications below.

Representation\_Form\_Pre-submission\_Spelthorne\_Local\_Plan -Chapter 10 SITES.docx

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/606409/DOCX/->

[/Representation%5FForm%5FPre%2Dsubmission%5FSpelthorne%5FLocal%5FPlan%20%2DChapter%2010%20SITES%2Edocx](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/606409/DOCX/-/Representation%5FForm%5FPre%2Dsubmission%5FSpelthorne%5FLocal%5FPlan%20%2DChapter%2010%20SITES%2Edocx)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Yes. We wish to participate in the hearing(s). To further elaborate on the points provided in box 6 above (box 7 below on the online form). Ensuring that sites are deliverable is useful in avoiding objections and subsequently appeals against refusal at the planning stage.

<b>Respondent: Judith Montford (19771841)</b>	
<b>Organisation:</b> Environment Agency	
<b>Response ID:</b> 1118338	
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Not effective - was also selected. Policy PS1 - Responding to the climate emergency It is noted in policy PS1 that in responding to the climate emergency only residential development is mentioned as achieving water efficiency of 110 litres per person. This requirement should be applied to all buildings where possible using a fittings approach. Water usage is not limited to households and therefore the Local Plan should be ensuring all new developments take a fittings approach in ensuring water efficiency measures are in place once occupied. We have concerns with this policy PS1 and therefore find this Plan to be unsound.	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
To overcome this point of soundness, reference should be made to all development which should achieve water efficiency of 110 litres per person.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Spelthorne Borough is within an area of water stress i.e., the area is affected by significant water shortages. Water is not always sufficient to meet the needs of the population or is of poor quality. The issue of water quality and quantity to meet the needs of the population in this area must be addressed hence implementing this policy will ensure this problem is addressed. Therefore, all development should achieve water efficiency of 110 litres per person and we would like to explain the importance.



<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1118355
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS2: Designing places and spaces
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not effective, Not consistent with national policy - were also selected PS2 - Designing Places and Spaces  Point of soundness Within section 7 - of policy PS2 ‘Major developments and allocated site’, it should be included that when designing development, tall buildings would be inappropriate on sites that are next to or near rivers as this has the potential to impact negatively on ecology and the status of watercourses. The Water Framework Directive (WFD) seeks to improve water quality in all our waterbodies (including lakes, rivers and estuaries and groundwater) and it has the objective of ensuring all waterbodies to achieve “good ecological status” by 2027. It is therefore important to prevent the deterioration of waterbodies (and seek enhancements where rivers, lakes and estuaries are not achieving good ecological status or potential). This requirement is supported by NPPF Paragraph 174 states that planning policies should contribute to enhancing the natural and local environment. We therefore We have concerns with this policy PS2 and therefore find this Plan to be unsound.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

To overcome this point of soundness policy PS2 should mention that 'tall buildings' would be inappropriate when near rivers due to the impact to the particular watercourse from overshadowing and would not be permitted.

**Question 6:** You can upload any modifications below.

Yes, I wish to participate in hearing session(s)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: We would like to further explain that as mentioned earlier, the Water Framework Directive (WFD) seeks to improve water quality in all our waterbodies (including lakes, rivers and estuaries and groundwater) and it has the objective of ensuring all waterbodies to achieve "good ecological status" by 2027. Tall buildings would be inappropriate on sites that are next to or near rivers as this has the potential to impact negatively on ecology and the status of watercourses. Tall buildings near watercourse could cause issues such as shading of the riparian buffer zone as well as of the watercourse.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1118357
<b>Policy / Evidence Base / Part of Plan:</b> Policy SP1: Staines-upon-Thames
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not effective, Not consistent with national policy - were also selected SP1 - Staines-upon-Thames Point of soundness 1 The policy SP1 fails to highlight the pressures facing the waterbodies running through Staines-upon-Thames. There are six Water Framework Directive main waterbodies (Colne Brook (GB106039023010), Horton Brook (GB106039023040), Colne (Confluence with Chess to River Thames) (GB106039023090), Surrey Ash (GB106039023480), Thames (Cookham to Egham) (GB106039023231) and Thames (Egham to Teddington) (GB106039023232). All these waterbodies have the Urban and Transport sector as Reasons for Not Achieving Good Status (RNAGs). All developments in the Staines-Upon-Thames area must consider the water quantity and water quality impacts they will have on the surrounding waterbodies. Currently policy SP1 only addresses flood risk to new development areas and fails to recognise the impacts new developments will have on surface water networks. We have concerns with this policy SP1 and therefore find this Plan to be unsound.

To overcome this point of soundness the pressures facing the waterbodies running through Staines-upon-Thames should be highlighted under the 'Infrastructure' section in policy SP1 when considering new development in the area. SP1 needs to recognise that current developments in Staines-upon-Thames are having a direct impact on their receiving waterbodies and action is needed to address these issues. Subsequently more, any new developments could be opportunities to address current water quality issues, such as fixing misconnected buildings, landscaping for SuDS, removing unnecessary physical structures, restoring floodplains.

#### Point of soundness 2

Section 1 (Strategy) of policy - SP1 highlight's due to Staines-Upon -Thames's size, location and significant opportunity for further regeneration it will be a key focus for housing, employment and retail development in the Borough. We note that further guidance for how the town grows sustainably and coherently will be provided within a new Staines Development Framework (the Framework).

Whilst we acknowledge that the Framework provides robust details about development proposals and objectives for this area, and also appears supportive of the inclusion of green and blue infrastructure throughout developments, the concept of blue green infrastructure has not been actively promoted within the Framework and hence the policy -SP1. We have concerns with this policy SP1 and therefore find this Plan to be unsound.

To overcome this point of soundness, firstly; it would be beneficial to have the concept of blue green infrastructure reflected within the 'Infrastructure' section of policy SP1. The Sustainability Appraisal indicators (see table on page 39) show that policy SP1 will have a positive impact on biodiversity the area and hence it should be reflected in the Policy SP1. We have also provided further comments on 'the Framework' (please see the representation made for the SDF) linked to this policy and have provided information on how to overcome the soundness points raised.

Secondly, section 9 of this policy 'Opportunities', should also include or refer to policy PS2 (when revised) about, tall buildings being inappropriate when located near rivers as this has the potential to impact negatively on ecology and the status of watercourses from overshadowing.

#### Point of soundness 3

Section 3 of Policy SP1 – 'Infrastructure' states; "Flood risk management infrastructure should be incorporated into proposals where appropriate. Current and expected flood risk from all sources should be managed in a sustainable and cost-effective way". It is not clear what is meant by this statement. It has been acknowledged that flood risk is present in this area. Large areas of Staines are in Flood Zones 2 and 3 and Policy SP1 is classed as having a negative impact on flooding as highlighted in the SP1 sustainability appraisal indicators. The Staines Development Framework however is classed as having zero impact on flooding. This discrepancy and the suggestion that the proposed policy could worsen flood risk is of concern. However, flood risk has not been comprehensively discussed and addressed in the framework and policy. Paragraph 5.6 states "Flood Risk is a notable constraint within Staines Town Centre." We agree with this statement and with the point made those efforts should be made to ensure that the impacts are minimised as much as possible for current and future generations. We have concerns with this policy SP1 and therefore find this Plan to be unsound.

To overcome this point of soundness, The Development Framework and Policy SP1 should discuss how flood risk will be mitigated or reduced overall where possible. This should include the application of the Sequential and Exception Tests as advised in NPPF paragraph 161, and provision of natural buffer zones where necessary.

We are pleased to see the suggestion of river restoration on the River Colne, given the multiple benefits this can provide.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

Overcoming point of soundness 1

SP1 needs to recognise that current developments in Staines-upon-Thames are having a direct impact on their receiving waterbodies and action is needed to address these issues. Subsequently more, any new developments could be opportunities to address current water quality issues, such as fixing misconnected buildings, landscaping for SuDS, removing unnecessary physical structures, restoring floodplains.

Overcoming point of soundness 2

As stated previously, firstly; it would be beneficial to have the concept of blue green infrastructure reflected within the 'Infrastructure' section of policy SP1. The Sustainability Appraisal indicators (see table on page 39) show that policy SP1 will have a positive impact on biodiversity the area and hence it should be reflected in the Policy SP1. We have also provided further comments on 'the Framework' (please see the representation made for the SDF) linked to this policy and have provided information on how to overcome the soundness points raised. Secondly, section 9 of this policy 'Opportunities', should also include or refer to policy PS2 (when revised) about, tall buildings being inappropriate when located near rivers as this has the potential to impact negatively on ecology and the status of watercourses from overshadowing

Overcoming point of soundness 3

The Framework and Policy SP1 should discuss how flood risk will be mitigated or reduced overall where possible. This should include the application of the Sequential and Exception Tests as advised in NPPF paragraph 161, and natural buffer zones where necessary.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Please refer to the details provided for each soundness reason provided.

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1118361
<b>Policy / Evidence Base / Part of Plan:</b> Policy SP2: Ashford, Shepperton and Sunbury Cross
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not effective - was also selected. SP2 - Ashford, Shepperton and Sunbury Cross Point of soundness Policy SP2 shows a negative impact on flooding from the plan policy (i.e. Flooding is classed as negative long term in the Sustainability Appraisal for Policy SP2) but there is no discussion of this in the policy nor is there a reference to flood risk for these locations. In Shepperton, there is flood risk from the River Ash and Thames and in Ashford there is flood risk from the Thames also. We are concerned about this as we do not consider a worsening of flood risk to be acceptable as is implied in this policy. We therefore consider this plan to be unsound. To overcome this point of soundness further details should be provided to justify why there is no discussion about flood risk for these locations considering there is a known risk of flooding in this area, or the policy should address flood risk and provide details regarding how flood risk will be avoided and mitigated.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

As stated above details should be provided in policy SP2 to justify why there is no discussion about flood risk for these locations considering there is a known risk of flooding in this area, or the policy should address flood risk and provide details regarding how flood risk will be avoided and mitigated.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: In Shepperton, there is flood risk from the River Ash and Thames and in Ashford there is flood risk from the Thames also therefore we would like to emphasise why it is important for this policy to acknowledge this issue and the need to address it.

<b>Respondent: Judith Montford (19771841)</b>	
<b>Organisation:</b> Environment Agency	
<b>Response ID:</b> 1118364	
<b>Policy / Evidence Base / Part of Plan:</b> Policy SP6: River Thames and its Tributaries	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>Not effective - was also selected.</p> <p>SP6 - River Thames and its Tributaries</p> <p>Point of soundness</p> <p>Point 9d specifies that an 8m natural buffer zone is required for main rivers and that the 5m buffer applies to ordinary watercourses. It is not clear why this policy for a natural buffer zone provision of the dimensions mentioned above only apply to the tributaries of the River Thames and not the River Thames itself. We highlighted this in our response to the Regulation 18 consultation however this has not been addressed neither has any justification provided. There is no other policy requirement for the River Thames in the local plan but only in policy SP6. We therefore have concerns in regard to policy SP6 which highlights how the River Thames should be protected. We therefore consider the Plan unsound</p>	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	



To overcome this point of soundness, a policy requirement ensuring an 8-metre undeveloped buffer zone is provided along the River Thames should be included in this section. We suggest this policy wording below.

Development proposals near the River Thames should retain or provide an undeveloped 8 metre buffer zone alongside it. This buffer zone should be on both sides of the watercourse and be measured from the top of the riverbank at the point at which the bank meets the level of the surrounding land.

Section 9, point d of Policy SP6 should also be re-worded to read:

(d) Provide undeveloped buffer zones of 8m minimum for main rivers and 5m minimum for other water courses. This is also applicable to culverted rivers. A scheme to provide a buffer zone will need to include a working method statement detailing how the buffer zone will be protected during construction and long-term ecological plan.

We are pleased to see the commitment in Point 9 to de-culverting/ preventing culverting, re-naturalising banks, and retaining natural banks. It is important to also include in the justification text that works to main river will require a Flood Risk Activity Permit under the Environmental Permitting (England and Wales) Regulations 2016.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To further explain the point made in box 5 and box 6 (4 and 5 here online) regarding the impotence of providing and protecting a buffer zone next to watercourses.

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1118333
<b>Policy / Evidence Base / Part of Plan:</b> Policy H1: Homes for All
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
<p>Not effective, Not consistent with national policy - were also selected.</p> <p>H1: Homes for All and H2: Affordable Housing</p> <p>Point of soundness</p> <p>Policy H1 and H2 does not to mention steering development away from flood risk and where a development is in flood risk, steer development to the lowest risk.</p> <p>Although reference is made in policy H1, point 9 and paragraph 6.19 about flood risk consideration, this is limited. We are therefore concerned that these polices include only limited discussion about flood risk despite parts of the Borough being in Flood Zones 2 and 3. Most of the discussion relates to how flood risk may impact other development aims, with no discussion about how to reduce the flood risk to new properties and people. We therefore consider this plan to be unsound. All new developments will need to adhere to Chapter 14 of the National Planning Policy Framework regarding flood risk, the 'Flood risk and coastal change' Planning Practice Guidance (updated August 2022) for flood risk and coastal change, and the Strategic Flood Risk Assessment.</p>

We have concerns with these policies H1 and H2 and therefore find this Plan to be unsound.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

To overcome this point of soundness for both policy H1 and H2, it should be included in these policies that the sequential test and approach will have to be applied as advised in National Planning Policy Framework paragraph 161. (Reference should be made to the policy E3 (when revised) within these policies – H1 and H2). Flood risk should also be discussed in relation to Point 10, to emphasise that any developments housing vulnerable people must be safe for the lifetime of the development and have safe access and egress.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To further explain the reasons provided in box 5 and 6 above. (4 and 5 here via system)

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1118334
<b>Policy / Evidence Base / Part of Plan:</b> Policy H3: Meeting the needs of Gypsy, Traveller and Travelling Showpeople
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not consistent with national policy
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
H3: Meeting the needs of Gypsy, Traveller and Travelling Showpeople Point of soundness According to National Planning Policy Framework Annex 3: Flood risk vulnerability classification, Caravans, mobile homes and park homes intended for permanent residential use are classified as vulnerable development. Table 2 of 'Flood risk and coastal change' Planning Practice Guidance (updated August 2022) for flood risk and coastal change, also shows that these types of developments will not be suitable in Flood Zone 3 and only when the exception test is passed will it be allowed in Flood Zone 2. Policy H3, does not include this detail and therefore we have concerns with this policy H3 and consider the plan to be unsound.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.

To overcome this point of soundness, Policy H3 should mention that “Caravans, mobile homes and park homes intended for permanent residential use” are considered “highly vulnerable” under the planning practice guidance and therefore not allowed in Flood Zone 3 and only allowed in Flood Zone 2 if the Exception Test is passed.

Also, Policy H3 it states under 4(e) “the location of the site provides a safe living environment free from the risk of flooding”, it is not clear what this means. For example, does this mean all future site allocations will be located only in Flood Zone 1? This should be clarified and whilst doing this there should be a cross reference to chapter 10 and chapter 7 (the revised) policy E3.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To further explain the point made in box 5 and box 6. ( 4 and 5 here)

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1118340
<b>Policy / Evidence Base / Part of Plan:</b> Policy E1: Green and Blue Infrastructure
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not consistent with national policy
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
E1: Green and Blue Infrastructure Point of soundness It is essential that in areas where developments will be located adjacent to watercourse developments are required to maintain a minimum of 8m buffer zone for main rivers and a minimum of 5 metres for ordinary watercourses. A buffer zone is natural infrastructure which is important for the following reasons (as listed). * To ensure water quality which is a primary objective of the Water Framework Directive. Any development adjacent and or in close vicinity to a watercourse will be required to ensure they do not prevent any watercourse from achieving future Good Status * To provide a wildlife corridor that links several habitats and affording species a wider and therefore more robust and sustainable range of linked habitats. * To allow the watercourse to undergo natural processes of erosion and deposition, and associated changes in alignment and bank profile, without the need for artificial bank protection works and the associated destruction of natural bank habitat.

- \* To provide for the terrestrial life stages of aquatic insects, for nesting of water related bird species, and for bank dwelling small mammals.
- \* To allow for the maintenance of a zone of natural character with vegetation that gives rise to a range of conditions of light and shade in the watercourse itself.
- \* To allow, where appropriate, for the regrading of banks to a lower and safer profile, in areas where there is public access.
- \* To prevent overshadowing of watercourses by buildings.
- \* To reduce the risk of accidental pollution from run-off
- \* To provide open space for public realm

Policy E1 fails to recognise this important requirement (which is supported by section 15 of the National Planning Policy Framework) and therefore we consider the plan to be unsound

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

Overcoming point of soundness 1

To overcome this point of soundness a minimum of 8 metres for main Rivers and 5 metres for watercourses is required in point 3 of policy E1. However, depending on the width of a watercourse a wider buffer zone would be more appropriate.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To further explain the points made in box 5 and box 6 (4 and 5 here online) about the importance of buffer zones next to watercourses and the requirement to protect and waterbodies from the impacts of development within the Borough.

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1118345
<b>Policy / Evidence Base / Part of Plan:</b> Policy E2: Biodiversity
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not consistent with national policy
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
E2: Biodiversity Point of soundness 1 Points 10 of this policy states "...If significant adverse effects remain even with the implementation of suitable avoidance and/or mitigation, development proposals will need to demonstrate that alternatives to the proposal have been fully explored". This statement is not acceptable, any development that continues to have a significant adverse effect despite alternative solutions and mitigation measures in place, then they are not sustainable developments and should therefore not be considered. This statement sets a precedent for continued unsustainable developments during a climate crisis. Furthermore, any deterioration of a waterbody is prohibited under Water Framework Directive. A significant adverse impact would equate to a deterioration. We have concerns with this policy E2 and therefore consider the plan to be unsound. To overcome this point of soundness, this sentence should be removed from point 10. Point of soundness 2



In the Section under 'Waterbodies in the Borough' we note that the policy does not cover or mention rivers and wetlands when considering the impacts of proposals on or adjacent to any waterbodies and associated habitat receptors and the likely significant effects. It is important to understand that rivers and wetlands are also by themselves important places for a good range of wildlife and should be included. We have concerns with this policy E2 and therefore consider the plan to be unsound.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

Overcoming point of soundness 1

To overcome this point of soundness, the sentence - "If significant adverse effects remain even with the implementation of suitable avoidance and/or mitigation, development proposals will need to demonstrate that alternatives to the proposal have been fully explored" should be removed from point 10.

Overcoming point of soundness 2

To overcome this point of soundness, section 10 of policy E2, should include rivers and wetlands not just SPA/Ramsar sites.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To further explain the points made in box 5 and box 6 (4 and 5 here online) about the protection and waterbodies from development within the Borough

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1118347
<b>Policy / Evidence Base / Part of Plan:</b> Policy E3: Managing Flood Risk
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not effective, Not consistent with national policy - were also selected. Policy E3: Managing Flood Risk Point of soundness We would like to see stronger wording in the Local Plan to demonstrate the Council’s commitment to managing flood risk, to ensure that the requirements of the National Planning Policy Framework and planning practice guidance are adhered to, so that development remains safe for its lifetime and does not increase flood risk elsewhere. We would also like to see a stronger commitment to exploring and taking advantage of opportunities to achieve betterment and reduce flood risk overall, including discussion of this in other policies throughout the Plan. In addition, the Local Plan appears to focus on how flood risk might impact other development aims but does not include enough emphasis on how development can exacerbate flood risk or about the importance of considering risk to property and life when planning new developments. We are also concerned about the fact that flood risk has been classed as a negative Sustainability Appraisal Indicator for some policies, as we do not consider a worsening of flood risk or reduction in resilience to be an acceptable outcome.

This Pre-submission Local Plan has not addressed all the concerns raised in our response to the Regulation 18 consultation, and this is discussed further below. We would also like to highlight that it is not clear whether the sequential test and exception test (where applicable) have been applied to the site allocations, and this is a cause for concern. We have concerns with this policy E3 and therefore find this Plan to be unsound.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

To overcome this point of soundness, we suggest the following amendments to several of the policy wording in policy E3 and some sections of the justification text as well.

We suggest this amended wording for Point 3

“New development must be guided to areas of lowest flood risk from all sources of flooding through the application of the sequential test. Where individual sites contain different flood zones, a site-specific sequential test should be applied to locate the most vulnerable uses in the areas of lowest risk. The exception test must be applied where national planning policy states that it is necessary.”

Point 5 refers to the Strategic Flood Risk Assessment in the footnote as where dry island is defined. The actual definition should be referenced in the footnotes.

Point 5c) should be amended to read;

c) a site-specific flood risk assessment demonstrates that the development, including will be safe for its lifetime (taking into account the appropriate climate change allowance) without increasing flooding elsewhere, and will, where possible, reduce flood risk overall;

There appears to be a missing word after ‘including’?

Whilst we are aware that the Local Planning Authority assess the matter of access and egress, point 5d) should be amended to ensure safe access and egress is provided for all developments, not just residential developments that increase the net number of units. This should be to an area outside the floodplain. Point 5d) should be amended to read;

d) safe access and egress is demonstrated for all developments of one or more net additional units;

As stated in other places, please note that the modelling is being updated so it may have an effect on safe access and egress of the sites.

Point 7a) states; ‘Within the 1 in 20 year (5% AEP) extent; (a) the provision of essential infrastructure will be supported but in principle the land should remain undeveloped to maintain flood storage capacity and not impede the flow of flood water.’ However no detail has been provided regarding the safety of developments. We would like to see a change of wording here to state that essential infrastructure should be avoided in Flood Zone 3b but will be considered if demonstrated to pass the exception test. For essential infrastructure to be permitted in FZ3b it should also be designed and constructed to:

- Remain operational and safe for users in times of flood
- Result in no net loss of floodplain storage
- Not impede water flows and not increase flood risk elsewhere

Point 7 c (ii) states that that extensions or re-development of buildings may be considered, subject to “Finished Floor Levels being raised where possible”. This statement requires further clarity. Further detail should be provided here whereby the applicant justifies why their extension/redevelopment cannot raise Finished Floor Level.

Point 7 c (iv) should provide further details. For instance, it is unclear whether increase floodplain storage capacity can be achieved if extension or re-development is located within the 1 in 20 extents.

Point 7 c (v) states that extensions or re-development of buildings may be considered, subject to impedance of floodwater flow being reduced. The policy should be clear on what is appropriate. For example, will this be via Voids and if this is the case, what is the Local Planning Authority’s stance on them?

Point 9) states ‘Within the 1 in 20-year (5% AEP) extent basements, basement extensions, conversions of basements to a higher vulnerability classification are not permitted. Basement car parks (or similar development) which are designed to allow the inflow and egress of flood water may be permitted’. This point should also mention that ‘basement car parks’ should only be allowed if safe access and egress is possible and there is no risk to life from “floating vehicles”.

In paragraph 7.28 there are discussions about the definition of flood zone 3b.

In our response to the Regulation 18 consultation, Local Plan preferred options consultation, we requested that the Local Plan included a definition of the functional floodplain for areas where detailed modelling of the 1 in 20 flood extent is not available. This has still not been included. Many authorities take a conservative approach in these circumstances and use Flood Zone 3 as shown on the flood map for planning.

The following allocated sites ST1/029, ST1/030, ST4/011 and ST4/002 are confirmed as being in 1 in 20 extent in Appendix B of the SFRA. The proposed sites being used as residential would be a policy objection. We note paragraphs 7.29 and 7.30 which appears to explain why these sites are still being allocated. However, we do not consider this to be acceptable.

We would like to see the inclusion of more monitoring indicators for policy E3 to better evaluate how well flood risk is being mitigated for and reduced. This section – Monitoring Indicators currently refers, incorrectly, to policy E2.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To further explain the point made in box 5 and box 6 (4 and 5 here online) and the reasons for the changes we have asked for. We would like to see stronger wording in the Local Plan to demonstrate the Council’s commitment to managing flood risk, to ensure that the requirements of the National Planning Policy Framework and the ‘Flood risk and

coastal change' Planning Practice Guidance (updated August 2022) for flood risk and coastal change are adhered to, so that development remains safe for its lifetime and does not increase flood risk elsewhere.

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1118350
<b>Policy / Evidence Base / Part of Plan:</b> Policy E4: Environmental Protection
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not effective, Not consistent with national policy - were also selected E4 - Environmental Protection Point of soundness Whilst we agree with the core principles of policy E4, some amendment is required to ensure the protection of ground water resources and ensure that contaminated land remediation issues are properly addressed. We have concerns with this policy E4 and therefore find this Plan to be unsound.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
To overcome this point of soundness the following is required. In point 5 of policy E4, we agree that development should not have any adverse impact on groundwater quality. However, this should be expanded to groundwater quantity as well – development should not have any adverse impact on groundwater flow or quantity, nor should there be any adverse impact on groundwater quality. The policy should include or be amended to include and reflect the need to protect and ensure ground water quantity.

In point 8 of policy E4, wording should be added to the policy to ensure that any risk assessment and subsequent remediation strategy at sites with land affected by contamination should be undertaken by a competent person as directed in the National Planning Policy Framework (NPPF) paragraph 183c). NPPF defines a Competent Person (to prepare site investigation): "A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation".

The use of receptors in point 8 should be defined and should include groundwater. The lack of definition of receptors was raised in our previous response but we note this has still not been added.

As stated in point 9ii and iii, we agree with the need for planning conditions at sites affected by land contamination. Discussion of planning conditions in 9ii should be expanded to include the requirements outlined in 9iii. A planning condition should be in place at sites affected by land contamination to ensure verification of remediation is completed to a sufficient standard.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To further explain the point made in box 5 and box 6 (4 and 5 here online) regarding the impotence of protecting ground water resources in term of quality and quantity. The policy as it stands does not fully ensure this.

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1118353
<b>Policy / Evidence Base / Part of Plan:</b> Policy ID1: Infrastructure and Delivery
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not justified, Not effective, Not consistent with national policy - were all selected ID1- Infrastructure and Delivery Point of soundness 1 Policy ID1 is classed as having a very positive (++) impact on the plan in terms of flooding in the long term (SAIs) but there is almost no discussion of flood risk in the policy to justify how this will be achieved and to promote opportunities for betterment. We have concerns with this policy ID1 and therefore find this Plan to be unsound. Point of soundness 2 It is stated in point 1 of policy ID1 that 'The Council will work with infrastructure providers, developers and other key stakeholders to support the delivery of the infrastructure necessary to enable the development set out in the Local Plan.' In our previous response we requested that recommendations from a Water Cycle Study be incorporated into the policy. Although a 2019 Water Cycle Study is referenced in the list of evidence for the Local Plan, the results have not been discussed explicitly in the Plan and policy. It is therefore not clear whether the results of this study have been incorporated.



A water cycle study is a useful source of evidence to inform wastewater drainage proposals. We note that no information has been provided in the plan regarding wastewater drainage proposals or how wastewater/effluent/foul water will be sustainably discharged from developments within the borough. The most sustainable method of disposing off wastewater/effluent/foul water is via the public sewer and whilst Spelthorne Borough's 2019 Water Cycle Study shows that all the wastewater flows from the borough will be going to Mogden Sewage Treatment Works, we find this has not been mentioned in the plan neither is there a specific policy to support this point. Paragraph 9.9 does not particularly support this point in the Water Cycle Study. We have concerns with this policy ID1 and therefore find this Plan to be unsound.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

Overcoming point of soundness 1

It should be mentioned in policy ID1 that infrastructure development will need to pass the sequential and exception tests where necessary and should be in an appropriate flood zone considering the development's vulnerability. We refer the council to NPPF Paragraphs 161 to 167 and Annex 3 and 'Flood risk and coastal change' Planning Practice Guidance (updated August 2022) Table 2 Developers will need to demonstrate that any new developments/infrastructure will be safe for their lifetime without increasing flood risk elsewhere, by assessing flood risk, residual risk, and safe access and egress.

Overcoming point of soundness 2

If an updated or current Water Cycle Study has been published as we stated in our response to the Regulation 18 consultation, this is an important baseline evidence document which should be considered, and any recommendations promoted by the study are incorporated within this policy. We would like to see evidence of this in the plan and this policy as advised in paragraph 31 of NPPF.

From this, a policy which discusses and instructs how wastewater/effluent/foul water will be sustainably discharged from developments within the borough is required in this plan. It could be a standalone policy or incorporated within policy PS1: Responding to the climate emergency.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: It is stated in the plan that 'The Council will work with key stakeholders to support the delivery of the infrastructure necessary to enable the development set out in the Local Plan.' Based on the details provided above, we would like to explain how evidence is useful in supporting policy decisions regarding infrastructure which is vital in supporting the delivery of the emerging plan.



<b>Respondent: Judith Montford (19771841)</b>	
<b>Organisation:</b> Environment Agency	
<b>Response ID:</b> 1128344	
<b>Policy / Evidence Base / Part of Plan:</b> AS1/011 (Land at Former Bulldog Nurseries, Town Lane)	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land]  FZ1 Within 8m of Stanwell Brook (culvert) -FR/17/S104 15146  Adjacent to Staines Moor SSSI, Southwest Waterbodies SPA and RAMSAR Stanwell Brook is adjacent and on site (in culvert) Principal superficial aquifer  Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK (<a href="http://www.gov.uk">www.gov.uk</a>).  An 8m buffer zone should be provided between the edge of the culvert and any built development.  The proposal needs to demonstrate that structural stability of the culvert will not be compromised, and that unrestricted access will be maintained.  Requires a WFD assessment.  A FRAP will be required for any works with 8m of a culvert.  See Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.</p>	

<p>Opportunities</p> <p>Deculverting options should be explored- potential for blue infrastructure.</p> <p>Deculverting also has multiple benefits including potential to reduce flood risk.</p>
<p><b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</p>
<p>No Response</p>
<p><b>Question 6:</b> You can upload any modifications below.</p>
<p>No Response</p>

<p><b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p>
<p>Yes/No/Not answered: No Response</p>
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response</p>

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128345
<b>Policy / Evidence Base / Part of Plan:</b> AS2/006 (Land East of Desford Way)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
FZ1 , Historic landfill on site and COMAH opposite site, Principal superficial aquifer Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK ( <a href="http://www.gov.uk">www.gov.uk</a> ). This site is partly located atop a historic landfill which means that any significant foundations or ground excavations at the site may lead to creation of a pathway for pollutants within the landfill to reach groundwater. We refer the LPA to the Environment Agency’s Approach to Groundwater Protection guidance which highlights our requirements for developments on landfill sites. Developers at any allocated sites located on a historic landfill would need to make enquiries regarding potential requirements under the Environmental Permitting Regulations 2016. The site lies upon a Principal Aquifer for public water supply and therefore this must be considered and assessed.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>	
<b>Organisation:</b> Environment Agency	
<b>Response ID:</b> 1128347	
<b>Policy / Evidence Base / Part of Plan:</b> AT1/002 (Land East of Ashford Sports Club, Woodthorpe Road)	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
FZ1 modelling may change , Over 20m from Stanwell Brook. Stanwell Brook culvert FR/17/S104 15146, Principal superficial aquifer	
Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK ( <a href="http://www.gov.uk">www.gov.uk</a> ).	
Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128354
<b>Policy / Evidence Base / Part of Plan:</b> AT1/012 (Ashford Community Centre, Woodthorpe Road) - Pre-submission Spelthorne Local Plan (Reg 19) consultation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
FZ2+3, partially an area benefitting from flood defences Modelling may change. Within 20m of River Ash. River Ash (GB106039023480) protected WFD main water body. Protected species in river. Secondary A superficial aquifer FRA required that demonstrates requirements of NPPF and PPG. Safe access and egress must be provided. New development must restore buffer zone between water body and property. Site specific requirements listed do not mention once the importance of the WFD water body adjacent to site and what that therefore entails legally. New development must ensure it does not cause deterioration or prevention of achieving good status. Policy SP6 River Thames and Tributaries. Minimum 8m buffer. Opportunities River Ash improvements -Enhancements to the water body along the stretch of the river the developments backs onto.

Enhancing floodplain, riverbanks, and beds. Provide public access to the river as recreational footpath and/or park.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
No Response
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>	
<b>Organisation:</b> Environment Agency	
<b>Response ID:</b> 1128367	
<b>Policy / Evidence Base / Part of Plan:</b> AT3/007 (Ashford multi-storey car park, Church Road)	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ1 Principal superficial aquifer Requirements Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK ( <a href="http://www.gov.uk">www.gov.uk</a> ). Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128369
<b>Policy / Evidence Base / Part of Plan:</b> AT3/016 (23-31 (not 11-19) Woodthorpe Road)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ1 Principal superficial aquifer Requirements Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK ( <a href="http://www.gov.uk">www.gov.uk</a> ). Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128370
<b>Policy / Evidence Base / Part of Plan:</b> HS1/002 (Land at Croysdale Avenue/ Hazelwood Drive)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ1 Principal superficial aquifer and historic landfill adjacent to site Requirements Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK ( <a href="http://www.gov.uk">www.gov.uk</a> ). There is a historic landfill next to (and some on) site which means that any significant foundations or ground excavations at the site may lead to creation of a pathway for pollutants within the landfill to reach groundwater. We refer the LPA to the Environment Agency's Approach to Groundwater Protection guidance Which highlights our requirements for developments on landfill sites. Developers at any allocated sites located on a historic landfill would need to make enquiries regarding potential requirements under the Environmental Permitting Regulations 2016.

The site lies upon a Principal Aquifer for public water supply and therefore this must be considered and assessed. Development at this site may also require an Environmental Permit.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128371
<b>Policy / Evidence Base / Part of Plan:</b> HS1/009 (Bugle Nurseries, Upper Halliford Road)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ1 Historic landfill adjacent to site (the historic landfill is on principal superficial aquifer, but the site is not) Requirements Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK ( <a href="http://www.gov.uk">www.gov.uk</a> ). This site is located next to a historic landfill which means that any significant foundations or ground excavations at the site may lead to creation of a pathway for pollutants within the landfill to reach groundwater. We refer the LPA to the Environment Agency's Approach to Groundwater Protection guidance Which highlights our requirements for developments on landfill sites. Developers at any allocated sites located on a historic landfill would need to make enquiries regarding potential requirements under the Environmental Permitting Regulations 2016.

The site lies upon a Principal Aquifer for public water supply and therefore this must be considered and assessed. Development at this site may also require an Environmental Permit.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128373
<b>Policy / Evidence Base / Part of Plan:</b> HS1/012 (Land East of Upper Halliford, Nursery Road)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ1 Principal superficial aquifer Requirements Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK ( <a href="http://www.gov.uk">www.gov.uk</a> ). Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>	
<b>Organisation:</b> Environment Agency	
<b>Response ID:</b> 1128374	
<b>Policy / Evidence Base / Part of Plan:</b> HS2/004 (Land south of Nursery Road)	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ1 Principal superficial aquifer Requirements Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK ( <a href="http://www.gov.uk">www.gov.uk</a> ). Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128375
<b>Policy / Evidence Base / Part of Plan:</b> LS1/024 (Land at Staines Road West and Cedar Way)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ1 Principal superficial aquifer Requirements Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK ( <a href="http://www.gov.uk">www.gov.uk</a> ). This site is in close proximity to two potable groundwater abstractions. the abstraction licence holder should be consulted with respect to any proposals for deep foundation / piling works at the site. Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128376
<b>Policy / Evidence Base / Part of Plan:</b> SE1/005 (Benwell House, Green Street)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ1 Principal superficial aquifer Requirements Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK ( <a href="http://www.gov.uk">www.gov.uk</a> ). Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128377
<b>Policy / Evidence Base / Part of Plan:</b> SE1/024 (Annandale House, Hanworth Road)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] F22 on site Principal superficial aquifer Requirements FRA required that demonstrates requirements of NPPF and PPG. Safe access and egress must be provided. Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128378
<b>Policy / Evidence Base / Part of Plan:</b> SN1/006 (Land to west of Long Lane and south of Blackburn Trading Estate)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ1 Site entrance within 8m of main river - West Bedfont Ditches- culvert FR/17/S104 15098 Principal superficial aquifer Requirements Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK ( <a href="http://www.gov.uk">www.gov.uk</a> ). An 8m buffer zone is required between the edge of the culvert and any built development. FRAP will be required for works within 8m of a culvert. Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128379
<b>Policy / Evidence Base / Part of Plan:</b> ST1/037 (Thameside House, South Street)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] F22+3 Approx 20m from Thames with protected species 2 protected species in nearby river SPZ 3, principal superficial aquifer Requirements Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer Notes to Planners There is a live application 20/00344/FUL. We have been consulted and provided comments 28 October 2020, WA/2020/127811/03 on Flood Risk and Contaminated Land

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Judith Montford (19771841)</b>	
<b>Organisation:</b> Environment Agency	
<b>Response ID:</b> 1128380	
<b>Policy / Evidence Base / Part of Plan:</b> ST1/043 (Land East of 355 London Road)	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ1 Adjacent to Staines Moor SSSI and Ramsar site Authorised landfill site opposite site. Only unproductive strata on site. Requirements Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK ( <a href="http://www.gov.uk">www.gov.uk</a> ).	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128381
<b>Policy / Evidence Base / Part of Plan:</b> ST3/004 (Oast House, Kingston Road)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ2 on site SPZ 3, small section of superficial aquifer on site Requirements Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK ( <a href="http://www.gov.uk">www.gov.uk</a> ). Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128382
<b>Policy / Evidence Base / Part of Plan:</b> ST4/002 (Bridge Street Car Park, Hanover House & Sea Cadet Building, Bridge Street, Staines)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ2+3, partially an area benefitting from flood defences [lies within the 1 in 20 extent]. Modelling may change. It should be noted that as it stands to allow development in this site is contrary to national policy. Within 8m of main river Thames (Lower). (Egham to Teddington) (GB106039023232) protected WFD main water body. Protects species in river adjacent to site SPZ 3, secondary A and principle superficial aquifer Requirements FRAP will be required for works within 8m of a main river and flood defence. This is near the flood defence so the proposals will need to prove that the stability of the defence will not be compromised and that unrestricted access to the river and defences will be maintained. FRA required that demonstrates the requirements of the NPPF and PPG. An 8m buffer zone between the river wall and built development should be implemented.

<p>Site specific requirements listed do not mention once the importance of the WFD water body adjacent to site and what that therefore entails legally. New development must ensure it does not cause deterioration or prevention of achieving Good status. Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.</p> <p>Opportunities Restoration of flood plain, provide buffer zone of 8 m biodiversity enhancements to banks of river/or provision of wildlife corridor. Opportunities for raising defences or improving the riverside to provide multiple benefits and reduce flood risk.</p> <p>Notes to Planners As stated, to allow residential development on this site is contrary to NPPF. If the update to the flood models/map still puts the site in the 1 in 20 extent, then the LPA will have to amend the proposed allocation. The requirements and opportunities will then apply.</p>
<p><b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</p>
<p>No Response</p>
<p><b>Question 6:</b> You can upload any modifications below.</p>
<p>No Response</p>

<p><b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</p>
<p>Yes/No/Not answered: No Response</p>
<p>If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response</p>

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128383
<b>Policy / Evidence Base / Part of Plan:</b> ST4/019 (Former Debenhams Site, High Street)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] Partially FZ2. Modelling may change. Adjacent to Staines Moor SSSI and Ramsar site SPZ 3, secondary A and principal superficial aquifer Requirements FRA required that demonstrates requirements of NPPF and PPG. Safe access and egress must be provided. Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128384
<b>Policy / Evidence Base / Part of Plan:</b> ST4/025 (Coppermill Road)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] Partially FZ2. Modelling may change Within 8m of main river - County Ditch Staines. Channel may be or culverted FR/17/S001 359738 Near to Staines Moor SSSI and Ramsar site Secondary A superficial aquifer Requirements 8m buffer zone required between edge of culvert/river and built development. Needs to demonstrate that structural stability of the culvert will not be compromised, and that unrestricted access will be maintained. A FRAP will be required for works with 8m of a culvert. FRA required that demonstrates the requirements of the NPPF and PPG. Safe access and egress must be provided.

Opportunities Deculverting has multiple benefits including potential to reduce flood risk.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
No Response
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>	
<b>Organisation:</b> Environment Agency	
<b>Response ID:</b> 1128397	
<b>Policy / Evidence Base / Part of Plan:</b> ST4/026 (Communications House, South Street, Staines)	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ2+3 SPZ3, principal superficial aquifer, within 100m of historic landfill Requirements Flood Risk Assessments will be required. Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128398
<b>Policy / Evidence Base / Part of Plan:</b> ST4/028 (William Hill / Vodafone/ Monsoon, High Street)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ2+3 Modelling may change SPZ3, principal superficial aquifer Requirements FRA required that demonstrates requirements of NPPF and PPG. Safe access and egress must be provided. Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>	
<b>Organisation:</b> Environment Agency	
<b>Response ID:</b> 1128399	
<b>Policy / Evidence Base / Part of Plan:</b> AE3/006 (158-166 Feltham Road)	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ1 Requirements Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK ( <a href="http://www.gov.uk">www.gov.uk</a> ).	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128403
<b>Policy / Evidence Base / Part of Plan:</b> AS1/001 (Tesco Extra, Town Lane)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ1 Main river Stanwell Brook on site. Stanwell Brook culvert FR/17/S104 15146 Near to Staines Moor SSSI and ramsar site Principal superficial aquifer Requirements Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK ( <a href="http://www.gov.uk">www.gov.uk</a> ). 8m buffer zone required between edge of culvert and built development. Needs to demonstrate that structural stability of the culvert will not be compromised, and that unrestricted access will be maintained. A FRAP will be required for works with 8m of a culvert.

Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128404
<b>Policy / Evidence Base / Part of Plan:</b> AS1/003 (Former Staines Fire Station, Town Lane)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ1 Within 20m of main river - Stanwell Brook culvert - FR/17/S104 15146 Near to Staines Moor SSSI and Ramsar site Principal superficial aquifer Requirements Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK ( <a href="http://www.gov.uk">www.gov.uk</a> ). 8m buffer zone required between edge of culvert and built development. Needs to demonstrate that structural stability of the culvert will not be compromised, and that unrestricted access will be maintained. A FRAP will be required for works with 8m of a culvert.

Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128406
<b>Policy / Evidence Base / Part of Plan:</b> HS1/012b (Land East of Upper Halliford Road)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ1 Principal superficial aquifer, next to historic landfill Requirements Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK ( <a href="http://www.gov.uk">www.gov.uk</a> ). Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>	
<b>Organisation:</b> Environment Agency	
<b>Response ID:</b> 1128407	
<b>Policy / Evidence Base / Part of Plan:</b> RL1/011 (Land at Staines and Laleham Sports Club, Worple Road)	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ2+3 [Flood risk may change] SPZ3, principal superficial aquifer Requirements Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	
<b>Question 6:</b> You can upload any modifications below.	

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Judith Montford</b> (19771841)
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128408
<b>Policy / Evidence Base / Part of Plan:</b> SC1/006 (Tesco Extra, Escot Road)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ1 Protected species within 8m but a main river Principal superficial aquifer Requirements Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK ( <a href="http://www.gov.uk">www.gov.uk</a> ). Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128409
<b>Policy / Evidence Base / Part of Plan:</b> SE1/020 (Sunbury Adult Education Centre, The Avenue)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ1 Principal superficial aquifer Requirements Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK ( <a href="http://www.gov.uk">www.gov.uk</a> ). Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128410
<b>Policy / Evidence Base / Part of Plan:</b> SE1/025 (Elmbrook House, Station Road)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ1 Principal superficial aquifer Requirements Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK ( <a href="http://www.gov.uk">www.gov.uk</a> ). Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>	
<b>Organisation:</b> Environment Agency	
<b>Response ID:</b> 1128411	
<b>Policy / Evidence Base / Part of Plan:</b> SH1/010 (Shepperton Library, High Street)	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ1 [safe access & egress required]. Secondary A bedrock aquifer Requirements Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK ( <a href="http://www.gov.uk">www.gov.uk</a> ). Safe access and egress must be provided.	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	
<b>Question 6:</b> You can upload any modifications below.	

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Judith Montford (19771841)</b>	
<b>Organisation:</b> Environment Agency	
<b>Response ID:</b> 1128412	
<b>Policy / Evidence Base / Part of Plan:</b> ST1/028 (Leacroft Centre, Leacroft, Staines)	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ2+3, partially benefitting from flood defences. Modelling may change. SPZ3 Requirements FRA required that demonstrates requirements of NPPF and PPG. Safe access and egress must be provided.	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128414
<b>Policy / Evidence Base / Part of Plan:</b> ST1/029 (Surrey County Council buildings, Burges Way, Staines)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ2+3 [Lies within the 1 in 20] Within 8m of main river - Sweeps Ditch. SPZ3, secondary A superficial aquifer Requirements Minimum 8m buffer required. Opportunities Sweeps Ditch improvements Notes to Planners As stated, to allow residential development on this site is contrary to NPPF. If the update to the flood models/map still puts the site in the 1 in 20 extent, then the LPA will have to amend the proposed allocation. The requirements and opportunities will then apply

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128415
<b>Policy / Evidence Base / Part of Plan:</b> ST1/030 (Fairways Day Centre, Knowle Green, Staines)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ2+3 [lies within 1 in 20] Within 8m of main river - Sweeps Ditch SPZ3, secondary A and principal superficial aquifer Requirements Minimum 8m buffer required. Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer. Opportunities Sweeps Ditch improvements Notes to Planners

As stated, to allow residential development on this site is contrary to NPPF. If the update to the flood models/map still puts the site in the 1 in 20 extent, then the LPA will have to amend the proposed allocation. The requirements and opportunities will then apply

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128417
<b>Policy / Evidence Base / Part of Plan:</b> ST3/014 (Birch House/London Road, Fairfield Avenue, Staines)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] Mostly FZ2 Modelling may change. SPZ3, principal superficial aquifer Requirements FRA required that demonstrates requirements of NPPF and PPG. Safe access and egress must be provided. Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Judith Montford (19771841)</b>	
<b>Organisation:</b> Environment Agency	
<b>Response ID:</b> 1128418	
<b>Policy / Evidence Base / Part of Plan:</b> ST4/004 (96-104 Church Street, Staines)	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land]  FZ2+3 Modelling may change.  Adjacent to Thames (Egham to Teddington) (GB106039023232) protected WFD main water body.  SPZ3, principal superficial aquifer  Requirements  FRA required that demonstrates requirements of NPPF and PPG. Safe access and egress must be provided.  New development must ensure it does not cause deterioration or prevention of achieving Good status.  Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer  Opportunities</p>	

Enhancement of area with SuDs to alleviate the pressure of surface water quality pressures associated along this water body. The close vicinity to this development area to Thames (Egham to Teddington) (GB106039023232), increases the importance of SuDS

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>	
<b>Organisation:</b> Environment Agency	
<b>Response ID:</b> 1128419	
<b>Policy / Evidence Base / Part of Plan:</b> ST4/O10 (Riverside car park, Thames Street, Staines)	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ3 Within 20m of main river, Thames Protected species in main river SPZ3, secondary A superficial aquifer Requirements FRA is required that demonstrates requirements of NPPF and PPG.	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128420
<b>Policy / Evidence Base / Part of Plan:</b> ST4/O11 (Thames Lodge Hotel, Thames Street, Staines)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ3. [Lies within the 1 in 20] It should be noted that as it stands to allow 'residential' development in this site is contrary to national policy -NPPF. Within 8m of main river, Thames. (Egham to Teddington) (GB106039023232) protected WFD main water body. Protected species in main river SPZ3, secondary A superficial aquifer Requirements FRA required that demonstrates requirements of NPPF and PPG. New development must restore buffer zone between water body and property. Site specific requirements listed do not mention once the importance of the WFD water body adjacent to site and what that therefore entails legally. New development must ensure it does not cause deterioration or prevention of achieving Good status. Opportunities

Restoration of flood plain Provide buffer zone of 8m, biodiversity enhancements to banks of river/or provision of wildlife corridor Notes to Planners As stated, to allow residential development on this site is contrary to NPPF. If the update to the flood models/map still puts the site in the 1 in 20 extent, then the LPA will have to amend the proposed allocation. The requirements and opportunities will then apply.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
No Response
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128421
<b>Policy / Evidence Base / Part of Plan:</b> ST4/023 (Two Rivers Retail Park Terrace, Mustard Mill Road, Staines)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ2 Modelling may change. Within 8m of main river - Colne or Adjacent to Colne (Confluence with Chess to River Thames) (GB106039023090) protected WFD main water body. Site is almost entirely bounded by Colne and Wraysbury Rivers. Natural high ground FR/17/S003 154770 and 455279. Also, within 8m of Lino Mill weir, footbridge, eel pass, and trash boom. Within 20m of Staines (Pound Mill) weir. Protected species in main river SPZ3, secondary A aquifer Requirements FRA required that demonstrates the requirements of NPPF and PPG. Safe access and egress must be provided. 8m natural buffer will be required between development and the main rivers and assets. Unrestricted access required along watercourse to reach the river and EA assets. Needs to demonstrate that structural stability of riverbank and assets will not be affected.

FRAP will be required for works within 8m of the main river and assets.

Site specific requirements listed do not mention once the importance of the WFD water body adjacent to site and what that therefore entails legally. New development must ensure it does not cause deterioration or prevention of achieving Good status.

Opportunities

River improvement works.

Restoration of riparian buffer zone, currently impacted by heavily modified concrete banks and beds. There is little naturalisation with little to no public access along the water body in this location. Opportunity to provide significant riparian buffer zone to the water body for the public to enjoy the blue network.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128423
<b>Policy / Evidence Base / Part of Plan:</b> ST4/024 (Frankie & Benny's/Travelodge, Two Rivers, Hale Street, Staines)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ2 Modelling may change. Within 8m of main river - Colne. Adjacent to Colne (Confluence with Chess to River Thames) (GB106039023090) protected WFD main water body.Natural high ground FR/17/S003 154603. Staines (Pound Mill) weir and gauging station 192816. Protected species in main river SPZ3, secondary A aquifer Requirements FRA required that demonstrates the requirements of NPPF and PPG. Safe access and egress must be provided. 8m natural buffer will be required between development and the main rivers and assets. Also New development must restore buffer zone between water body and property. Unrestricted access required along watercourse to reach the river and EA assets. Needs to demonstrate that structural stability of riverbank and assets will not be affected.

FRAP will be required for works within 8m of the main river and assets.

Site specific requirements listed do not mention once the importance of the WFD water body adjacent to site and what that therefore entails legally. New development must ensure it does not cause deterioration or prevention of achieving Good status.

Opportunities

River improvement works.

Restoration of riparian buffer zone, currently impacted by heavily modified concrete banks and beds. There is little naturalisation with little to no public access along the water body in this location.

Opening of the site for the public biodiversity enhancements to the water body.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128424
<b>Policy / Evidence Base / Part of Plan:</b> AS2/001 (Ashford Youth Club, Kenilworth Road)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ1, Principal superficial aquifer Requirements Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK ( <a href="http://www.gov.uk">www.gov.uk</a> ). Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>	
<b>Organisation:</b> Environment Agency	
<b>Response ID:</b> 1128426	
<b>Policy / Evidence Base / Part of Plan:</b> AT3/009 (Ashford Telephone Exchange, Church Road)	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ1 Principal superficial aquifer Requirements Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK ( <a href="http://www.gov.uk">www.gov.uk</a> ). Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128427
<b>Policy / Evidence Base / Part of Plan:</b> SC1/013 (RMG Warehouse & Delivery Office, Staines Road West)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ2 Principal superficial aquifer Requirements FRA required that demonstrates requirements of NPPF and PPG. Safe access and egress must be provided. Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128428
<b>Policy / Evidence Base / Part of Plan:</b> SC1/019 (Sunbury Social Services Centre, Vicarage Road)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] Partially (looks like access) is FZ2 Principal superficial aquifer, Requirements FRA required that demonstrates requirements of NPPF and PPG. Safe access and egress must be provided. Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128429
<b>Policy / Evidence Base / Part of Plan:</b> SC1/021 (Land at Spelthorne Grove)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] Majority of site in FZ2 Protects species but not a main river Principal superficial aquifer, within 30m of historic landfill Requirements FRA required that demonstrates requirements of NPPF and PPG. Safe access and egress must be provided. Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>	
<b>Organisation:</b> Environment Agency	
<b>Response ID:</b> 1128431	
<b>Policy / Evidence Base / Part of Plan:</b> SE1/003 (Builder's Yard, Staines Road East)	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] Majority of site in FZ2 Principal superficial aquifer Requirements FRA required that demonstrates requirements of NPPF and PPG. Safe access and egress must be provided. Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128432
<b>Policy / Evidence Base / Part of Plan:</b> SE1/008 (Telephone Exchange, Green Street)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ1 Principal superficial aquifer Requirements Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK ( <a href="http://www.gov.uk">www.gov.uk</a> ). Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Judith Montford (19771841)</b>	
<b>Organisation:</b> Environment Agency	
<b>Response ID:</b> 1128433	
<b>Policy / Evidence Base / Part of Plan:</b> SH1/015 (Shepperton Youth Centre, Shepperton Court Drive)	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] Partially FZ2 Approx 75m from authorised landfill, principal superficial aquifer and secondary A bedrock aquifer Requirements FRA required that demonstrates requirements of NPPF and PPG. Please refer to the Environment Agency’s Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>	
<b>Organisation:</b> Environment Agency	
<b>Response ID:</b> 1128434	
<b>Policy / Evidence Base / Part of Plan:</b> SH2/003 (Shepperton Delivery Office, High Street)	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ1 Secondary A bedrock aquifer Requirements Flood Risk Assessments may be required for some of these developments. Safe access and egress must be provided. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK ( <a href="http://www.gov.uk">www.gov.uk</a> ).	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	
<b>Question 6:</b> You can upload any modifications below.	

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128435	
<b>Policy / Evidence Base / Part of Plan:</b> SN1/005 (Land at Northumberland Close)	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ1 Approx 40m from main river - Duke of Northumberlands Protected species in main river Principal superficial aquifer Requirements Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK ( <a href="http://www.gov.uk">www.gov.uk</a> ). Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.	

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128436
<b>Policy / Evidence Base / Part of Plan:</b> SN1/012 (Stanwell Bedsits, De Havilland Way)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ1 Principal superficial aquifer Requirements Flood Risk Assessments may be required for some of these developments. The following guidance should be adhered to: Flood risk assessment in flood zone 1 and critical drainage areas - GOV.UK ( <a href="http://www.gov.uk">www.gov.uk</a> ). Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Judith Montford (19771841)</b>	
<b>Organisation:</b> Environment Agency	
<b>Response ID:</b> 1128437	
<b>Policy / Evidence Base / Part of Plan:</b> ST1/031 (Thameside Arts Centre, Wyatt Road)	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ2 SPZ3, principal superficial aquifer Requirements FRA required that demonstrates requirements of NPPF and PPG. Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128438
<b>Policy / Evidence Base / Part of Plan:</b> ST2/006 (Builders Yard, Gresham Road)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] small amount of FZ2+3 on site SPZ3, principal and secondary A superficial aquifer, approx. 35m from historic landfill Requirements FRA required that demonstrates requirements of NPPF and PPG. Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>
<b>Organisation:</b> Environment Agency

<b>Response ID:</b> 1128439
<b>Policy / Evidence Base / Part of Plan:</b> ST3/012 (Staines Telephone Exchange, Fairfield Avenue)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ2+3, partially benefitting from flood defences. Modelling may change. SPZ3, principal superficial aquifer Requirements FRA required that demonstrates requirements of NPPF and PPG. No safe access and egress possible to outside the floodplain so safe havens required on upper floors. Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Judith Montford (19771841)</b>	
<b>Organisation:</b> Environment Agency	
<b>Response ID:</b> 1128440	
<b>Policy / Evidence Base / Part of Plan:</b> ST4/009 (Elmsleigh Centre and Adjoining Land, South Street)	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Site constraints [Flood Risk/ Main River/ Biodiversity and Ecology/ Ground Water/Contaminated Land] FZ2+3 SPZ3, principal superficial aquifer Requirements FRA required that demonstrates requirements of NPPF and PPG. Please refer to the Environment Agency's Approach to Groundwater Protection guidance for the types of development proposals that we would object to within a Principal Aquifer.	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Sinead Mooney (25515745)</b>	
<b>Organisation:</b>	
<b>Response ID: 1119466</b>	
<b>Policy / Evidence Base / Part of Plan: Policy SP1: Staines-upon-Thames</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
<p>I write to you to set out my support for the zoning plan for Staines Upon Thames. Please note that I do not support any developments that will exceed the zoning levels. I will however support any developments that fall below the zoning levels.</p> <p>Few outside Staines town centre realise the 'hit' the Staines community is taking in order for the borough to meet the housing needs figure. As members elected by the Staines community it is only right that we do everything we can to mitigate the effects of the proposed developments by strongly supporting zoning and resisting any dilution of those proposals with equal vigour.</p> <p>There are parts of Staines that would benefit from regeneration and infrastructure improvements, I welcome the work on improving the Staines environment and seeking solutions to improve the existing offers and opportunities for local residents.</p>	
<b>Question 6: You can upload any modifications below.</b>	

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Cllr Sinead Mooney (37487553)</b>	
<b>Organisation: Spelthorne BC Councillor</b>	
<b>Response ID: 1119427</b>	
<b>Policy / Evidence Base / Part of Plan: Policy E5: Open Space and Recreation</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Please find the attached detailed submission(s) for Local Green Space, the submission contains location map, photo, reason and contact details. This location is critical to be protected, and is highly valued by local residents. I would also like to take the opportunity to thank you for all your hard work on the local plan, this is appreciated by the residents of Spelthorne.	
<b>Question 6: You can upload any modifications below.</b>	
LGS Staines Brookside Rd 2209p.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589146/PDF/-/LGS%20Staines%20Brookside%20Rd%202209p%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589146/PDF/-/LGS%20Staines%20Brookside%20Rd%202209p%2Epdf</a>	
LGS Staines Kingston Crescwent 2209p.pdf	

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589147/PDF/-/LGS%20Staines%20Kingston%20Crescwent%202209p%2Epdf>

LGS Staines Laleham Rd 2209p.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589148/PDF/-/LGS%20Staines%20Laleham%20Rd%202209p%2Epdf>

LGS Staines Leacroft 2209p.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589149/PDF/-/LGS%20Staines%20Leacroft%202209p%2Epdf>

LGS Staines Boundary Road 2209p.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589150/PDF/-/LGS%20Staines%20Boundary%20Road%202209p%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Chris Moore (42140481)</b>
<b>Organisation: Diageo Pension Trust Limited</b>

<b>Response ID: 1119939</b>	
<b>Policy / Evidence Base / Part of Plan: Evidence base - ELNA</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No. Not Positively, Prepared Not Justified, Not Effective, Not Consistent with National Policy.	Additional Comments: No. Not Positively, Prepared Not Justified, Not Effective, Not Consistent with National Policy.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. We welcome the publication of an updated Employment Needs Assessment (ELNA) as part of the evidence base on account of the concerns that were previously raised in respect of the accuracy of the 2018 version.	

Notwithstanding this, we would still question the validity of the methodology used to forecast employment floorspace requirements within the Borough. Specifically, we would note that demand for new floorspace is based on a single economic forecasting methodology which the Council accepts is subject to inherent limitations.

The forecasting should be interrogated in a finer grain detail to ascertain the local level data that has used to achieve the final outputs such that its appropriateness and accuracy can be tested. This should include cross referencing to alternative evidence sources such as: historic take up rates, intense lack of supply of existing stock or a labour-market derived assessment.

The 2018 ELNA identified that there would be a total requirement for 8,164 sq. m of new B Class floorspace over the period from 2017-35 (see Table 14). By comparison, the 2022 ELNA forecasts a requirement for 19,109 sq. m for the period 2022-37 (see Table 12). This represents an uplift of over 10,000 sq. m and brings into question the accuracy of the 2022 ELNA to positively plan for the full 15 year plan period.

In reaching its conclusion, the 2022 ELNA simply deducts the projected reduction in Class B2 floorspace (11,268 sq. m) from the projected requirement for Class E(g) and B8 floorspace (30,377 sq. m). The ELNA however acknowledges that ‘...due to the locations and nature of the floorspace it is unlikely all of the former B2 floorspace could be used for B1 and B8’

Whilst the loss of jobs from businesses within Class B2 are likely to be realised, the sites may not be available or suitable for replacement operations in Classes E(g) and B8. Sites may be constrained by location, access, surrounding land uses or a variety of other private matters linked to availability or viability. The Local Plan does not proactively identify any sites that are currently within use for Class B2 that would be suitable for alternative employment uses. The generic assumption that existing business areas can accommodate the requirements for growth is not sufficiently robust. Our analysis linked to availability (e.g. existing lease lengths) indicates that the existing employment areas will not have the capacity to support any material level of intensification in the medium term.

In order to have certainty that replacement economic productivity and jobs can be created within the Borough, the Council must plan positively through formal allocations. The fact that no illustrative target for new employment floorspace has been identified as part of the spatial strategy seriously brings into question whether a sufficient supply of sites has been identified to meet existing and future demands over the Plan period.

Modifications:

The emerging Local Plan cannot be considered sound as the ELNA has significantly underestimated future demand such that it has not allocated enough land. Accordingly, the EDNA is not a justified or appropriate evidence base for assessing needs for employment land allocations. Rather, it is demonstrably flawed.

Diageo strongly recommends the Council utilises a range of ‘bottom up’ evidence along with macro projections to ensure that the employment land supply can meet the strategic objectives for the Borough. This will ensure that the Local Plan is able to positively plan for growth through appropriate allocations and thus pass the four test of soundness.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: The Council's approach is not considered to be consistent with national planning policy and is not justified by the supporting evidence base. We consider these to be significant issues with the Pre-submission Local Plan that require in-depth consideration and discussion.

<b>Respondent: Mr Chris Moore (42140481)</b>
<b>Organisation: Diageo Pension Trust Limited</b>

<b>Response ID: 1119937</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not justified, Not effective, Not consistent with national policy - All were selected Diageo supports the inclusion of a strategic policy that seeks to establish a clear spatial strategy for development within the Borough. However, there is concern that the aspirations related to economic growth are too vague such that they do not go far enough to ensuring that relevant objectives linked to ensuring that there is a sufficient supply of employment floorspace to meet current and future demand. Diageo previously objected to the quantum of employment floorspace which had been identified by the Preferred Options Local Plan given the issues in the accuracy of the evidence base. These concerns have been realised following the publication of the 2022 Employment Land Needs Assessment (ELNA) which has informed the preparation of the Pre-Submission Local Plan. The 2018 ELNA identified that there was an anticipated requirement for just 8,164 sq. m of new Class B floorspace over the period 2017-2035. As part of their representations to the Preferred Options Local Plan Diageo highlighted inherent limitations in the methodology used by the Council to calculate demand for new employment floorspace. These limitations resulted in the level of employment land supply being significantly below the quantum that is required for an 18 year period.



Critically, this shortfall has been demonstrated following the publication of the 2022 ELNA which forecasts that there is now a requirement for 19,109 sq. m of new Class B floorspace within the Borough between 2022 and 2037 (an increase of 134%). Given that the two versions of the ELNA were published less than 4 years apart we would question how robust any projections can be when read in the context of a planning positively for a 15 year plan period. Notwithstanding the above, the removal of any quantifiable target for new employment floorspace or jobs from Policy ST2 within the Borough is not supported. This does not serve to deliver a strategy for the spatial distribution of new floorspace such that there can be clear direction around whether the Borough has the potential to sufficiently accommodate this. The delivery of employment floorspace and associated infrastructure should also be directly linked to the housing requirement for the Borough. In this respect, it is notable that whilst the Council has chosen to adopt the Government's methodology to calculate its housing need it is silent on employment floorspace targets in comparison.

The ability to maintain and intensify the existing floorspace offer is questionable for the reasons we set out within our representations to the Preferred Options Local Plan. As such, it is not considered that sufficient land has been identified by the Local Plan to meet future demand and ensure effective operation of the local property market. Critically, it appears as though no employment floorspace target has been stated as part of the spatial strategy due to the fact that the level of land allocation is entirely inadequate for the Borough.

Furthermore - site SC1/009

As per our representations to Policy ST2 and EC1, there is considered to be a significant shortfall in provision for employment floorspace in the emerging Local Plan. This situation is made worse by the fact that no sites have been allocated to deliver future supply as it may arise. This will further increase the objectively assessed need for employment land over the Plan-period.

Diageo consider that their site at 'Land to the north of M3, J1, Sunbury' ('the Site') should be allocated for employment purposes. Diageo have put this site forward previously and given the site's relationship with the existing adjacent employment sites and highways network, this is an eminently sustainable opportunity, which is available, suitable and achievable.

The allocation of the site and subsequent proposal for employment development would make a material contribution to the requirement for additional employment development over the planperiod.

The locational characteristics of the site and its highly accessible location close to the strategic road network mean that there will be high demand from the market for industrial and logistics development. The proposal will therefore be a successful development in meeting the economic growth requirements for the Borough.

Further, the allocation of the site for employment development will deliver significant economic benefits and social value, including private sector investment of approximately £32m and the creation of circa 650 jobs during the construction and operational phases.

The Site is presently located in the Green Belt. However, there are no alternative sites within non-Green Belt locations that can meet the identified need for the proposed uses.

Diageo requests that the Council reconsiders the suitability of the Site for development having regard to the significant under supply of employment land. Diageo maintains its position that the release of the land from the Green Belt and its preferred development scheme (as illustrated within the representations to the Preferred Options Local Plan) would not have any unacceptable policy impacts.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

Diageo strongly opposes the approach used to identify employment floorspace requirements as part of the spatial strategy. This is a central issue of concern, which goes to the heart of the soundness of the Plan, which will require detailed consideration at the Examination.

Local planning authorities are required to positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change. Planning policies should amongst other things be 'flexible enough to accommodate needs not anticipated in the plan...to enable a rapid response to changes in economic circumstances'.

On this basis we maintain that Policy ST2 does not comply with the NPPF in that it fails to provide a '...clear understanding of business need... or meet the needs of business and support an economy fit for the 21<sup>st</sup> Century.'

The delivery of employment floorspace to facilitate investment, economic productivity, job creation and prosperity are all equally as important policy requirements as protecting Green Belt and forms part of the overall objective of the NPPF to deliver 'sustainable development'.

Furthermore - site SC1/009:

The land at Site SC1-009 should be allocated for employment development purposes to assist in ensuring that objectively assessed employment needs in Spelthorne can be met over the Plan period and beyond (in accordance with the NPPF).

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: The Council's approach is not considered to be consistent with national planning policy and is not justified by the supporting evidence base. We consider these to be significant issues with the Pre-submission Local Plan that require in-depth consideration and discussion.

The Council's approach is not considered to be consistent with national planning policy and is not justified by the supporting evidence base. We consider these to be significant issues with the Pre-submission Local Plan that require in-depth consideration and discussion. Specifically, this will assist the Inspector in understanding more fully the opportunities at Site SC1-009 and the implications of the current policy wording for such opportunities.

<b>Respondent: Mr Chris Moore (42140481)</b>
<b>Organisation: Diageo Pension Trust Limited</b>

<b>Response ID: 1119938</b>
<b>Policy / Evidence Base / Part of Plan: Policy EC1: Meeting Employment Needs</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not justified, Not effective, Not consistent with national policy - were also selected. Diageo object to the removal of a quantifiable employment floorspace target from Policy EC1. Without this, the plan is not effective or positively prepared in informing the spatial strategy to accommodate the required level of existing and future demand for employment floorspace within the Borough. Whilst the general principles of the Policy around protecting and enhancing established employment areas are supported the lack of evidence or analysis undertaken by the Council in assuming this approach is sufficient to meet employment needs within the Borough is not robust. The Local Plan should Plan positively to ensure that the full range of new positions can be met at any point to ensure levels of unemployment do not rise. This requires proactively identifying new sites for allocation. As the new Local Plan emerges, it is important that it adheres to the requirements of the NPPF in positively promoting new development in sustainable locations across the Borough. We would also note that the Monitoring Indicators for Policy EC1 state that the target for net change in permitted and completed E (g) (i and ii), B2 and B8 floorspace appears to be based on the figures stated within the 2018 Employment Land Needs Assessment as opposed to the more up to date 2022

version. Furthermore, the number of additional jobs in Class B within the Borough by 2037 is stated to be 900 which appears to be incorrect. These inaccuracies demonstrate the issues around the ability of the Plan and allocations as drafted to meet the requirements of the Borough.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

Amendments to Policy EC1 are required to provide details of the objectively assessed need for employment land in Spelthorne based on a robust and up to date evidence base for assessing employment land requirements.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: The Council's approach is not considered to be consistent with national planning policy and is not justified by the supporting evidence base. We consider these to be significant issues with the Pre-submission Local Plan that require in-depth consideration and discussion.

<b>Respondent: Mr Eric Moore (34187777)</b>
<b>Organisation:</b>

<b>Response ID: 1124251</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
We write yet again to express our ongoing disappointment at the council's instance of reducing the once lovely area of Staines into another high density built up area. The idea of reducing Greed Belt areas adds yet more evidence of this. All Green Belt land should and was sacrosanct from planning, so it should all be protected for our next generation. The council boasts about its efforts in aiding the environment and reducing its carbon foot print so why you would want to exasperate this and not fight to protect it? The government want to build more houses, there are plenty of slum and disused industrial areas in the country where this can be done without stealing Green Belt areas.

We wish to register our objections to any removal of Green Belt areas

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Kevin and Louise Moore (42010945)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117508</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>We write with the strongest objection to the possible development on the beautiful green on Elgin Avenue. This area is a green breath of fresh air in an over populated area. We use it for walking in the evening and really appreciate the green space, especially the ancient pear trees which were part of the original orchard in the area. It is a really peaceful place for people to meet and chat because you can get away from the road.</p> <p>Currently parking down this busy road is chronic and building extra houses etc. will only add to the congestion. Traffic travels too fast along Elgin and more parking represents a greater risk of a serious accident.</p> <p>We have a strong neighbourhood bond in Elgin and the green is considered for group events as a valuable shared space.</p> <p>Building on this peaceful piece of land would be a really big mistake. Please take our comments into consideration. There aren't many green areas left within housing estates.</p>	

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Lucy Moore (42037537)</b>
<b>Organisation:</b>

<b>Response ID: 1124625</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I'm writing to state that I don't object to Spelthorne Council's Local Plan to remove areas of Green Belt and to use it for development. The reasons given to release green belt are stated as 'exceptional circumstances', however the most pressing exceptional circumstance currently is climate change and the council's actions will be to the detriment of this. Removing areas of green belt will contribute to the increased temperatures, frequent flooding and drought that we have experienced recently. I reject the claim that some areas of Green Belt are weakly performing, as all of these areas will be creating biodiversity and so contributing positively to our environment. There are plenty of brown field sites being under utilised which could be repurposed or developed if there is a need to provide extra housing and so there is no need to use Green Belt land.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Claire Moran (41563329)</b>	
<b>Organisation:</b>	
<b>Response ID: 1112782</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
LGS: Sunbury Common : Heatherlands I am writing in support of designating Heatherlands as a Local Green Space in the Spelthorne Local Plan. The small green in the centre of our cul de sac provides a space for the children to play together safely; it attracts wildlife (for example numerous birds in our two lovely trees, cats, foxes, squirrels etc). It also provides invaluable safe parking for residents and visitors alike and a communal space for public celebrations. It is only a small area but it really helps make this road a lovely, friendly place to live.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Jennifer Morris (41500449)</b>
<b>Organisation:</b>

<b>Response ID: 1123786</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Greenbelt, Sunbury common, groveley road I would like to register my concerns regarding the latest updates to plans for green belt land and local spaces. Firstly, I would like to make it clear that the green space within Woodberry Close (TW167RP) in sunbury is a vital piece of land that has enabled a genuine connection between all of the neighbours. We used it as a safe-haven to have socially distanced coffees in the pandemic, we decorate the trees to have Christmas and Halloween events on the green, and have social gatherings on bank holidays.

I can't see that there would be any reason for the council to show any interest in a piece of land such as this, but stranger things have happened, therefore I want it to be clear that this piece of land is well-loved and any attempt to take it over would be met with some very angry responses on the part of the residents.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Jennifer Morris (41500449)</b>
<b>Organisation:</b>

<b>Response ID: 1124085</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Greenbelt, Sunbury common, groveley road I would like to register my concerns regarding the latest updates to plans for green belt land and local spaces. Secondly, the proposal to build up to 200 houses on the land behind the Running Horse pub off of Groveley Road is extremely concerning. We DO NOT have the amenities to support this. We have one Health Centre that is in dire need of updating and expansion, buckling under the weight of catering to the entire area, no dentists in the area, schools that have waiting lists due to oversubscription and roads that are horrendously backed up at peak times for work and school drop off. It takes up to 45 minutes to drive from this address down to Green street on a week day in school time, it is a joke to consider adding more people and traffic to a struggling system.

If you cannot meet the demands of the housing quotas set by the Government then the onus is on you to push back against these unrealistic expectations.

Anyway, opinion voiced! If we don't reply to these updates then our voice isn't heard.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr John Morris (41802913)</b>
<b>Organisation:</b>

<b>Response ID: 1124243</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
We write with concern regarding a most serious threat to Green Belt land behind The Running Horse as we understand that there is a proposal being put forward to build 200 houses on this land. Of course developers desire this type of land as they can make huge profits from the sale of houses like this, and the local Spelthorne Council can tick a box regarding providing more accommodation to satisfy some distant Government housing target. But what about the effect on the existing local community? There are always promises from developers and Council people to provide assurances that the knock-on effect will be minimal... but experience has shown that this is not the case.

Our fears for such a large development so near to us (we live in Ashridge Way) are that services are already extremely stretched in this area... schools are over-subscribed, try getting a doctor's, hospital, or dentist appointment, the drainage around this area is horrendous and already a huge problem. This names but a few of the problems that will arise from such a large development. Not to mention all the increased volume of traffic which a new housing estate would mean .. try getting through Sunbury Cross from any direction on a rainy school day !!!! It is grid-locked in the rush hour, and God forbid there is an accident in the local area to compound an already intolerable situation. And then of course there is the problem of air pollution which inevitably will increase. We need these large open green spaces to breathe, especially as flights are now increasing again after the pandemic. But of course the people who profit from these developments don't live in this area so why should they have any concerns for the local community. We understand that this land is Common Green Belt, and should remain as such and certainly not be built on at any time in the future. We hope that you take these objections into account when considering any new developments in this area.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Michele Morrison (33961089)</b>	
<b>Organisation:</b>	
<b>Response ID: 1125938</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
We are writing to express our very strong objection to the local plan because it is a shocking overdevelopment of the Borough, and of Staines in particular. It has been drawn up with a total disregard for the residents' needs and for what is required to support a sustainable, safe and pleasant environment for all who live in the Borough. We object to the use of green belt for development, high density high rise housing in Staines and the infringement of the conservation area for further development. Furthermore, The plan is extremely vague about the pressures on an already overloaded infrastructure: schools, medical and emergency services, utilities, etc).	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Michele Morrison (33961089)</b>
<b>Organisation:</b>

<b>Response ID: 1124615</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
We object to the use of green belt for development, high density high rise housing in Staines and the infringement of the conservation area for further development. Furthermore, The plan is extremely vague about the pressures on an already overloaded infrastructure: schools, medical and emergency services, utilities, etc).
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
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Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ian Motuel (42130017)</b>
<b>Organisation: Royal Borough of Windsor &amp; Maidenhead</b>

<b>Response ID: 1122467</b>
<b>Policy / Evidence Base / Part of Plan: Evidence base - ELNA</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
We understand that the Employment Land Needs Assessment (ELNA) study from 2018 was updated in 2022 and that this has identified a need for 19,109 sqm of employment floorspace, an overall increase of 10,495sqm since the 2018 ELNA. We do acknowledge that the COVID-19 pandemic has created some uncertainty regarding employment land needs and instability in the market, with trends towards greater remote working. In its recently adopted Borough Local Plan, RBWM has sought to protect its existing stock of employment land as well as allocating new employment sites to deliver sufficient job growth. We are therefore pleased that the overall strategy in the Spelthorne Local Plan is to retain existing employment areas and to review the need for employment land in the five-year review period.
<b>Question 6: You can upload any modifications below.</b>
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Ian Motuel (42130017)</b>
<b>Organisation: Royal Borough of Windsor &amp; Maidenhead</b>

<b>Response ID: 1122468</b>
<b>Policy / Evidence Base / Part of Plan: Evidence base - Highways Assessment</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
RBWM note that a highways impact assessment has been undertaken by Surrey County Council on behalf of Spelthorne BC to model the potential impacts on the highway network of the Draft Spelthorne Local Plan. The impacts are expected to be local to the developments and not severe, although there are likely to be some cumulative impacts in Staines, Stanwell, Ashford and Sunbury. The Strategic Highways Assessment 2022 suggest some cross boundary impacts on the A30 exit/approach to and from the M25 J12 crossing into RBWM and also B376 Wraysbury Rd crossing boundary into RBWM. As such we would like to understand if any mitigation proposals have been developed to address these impacts and seek to work collaboratively to agree them.
<b>Question 6: You can upload any modifications below.</b>
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ian Motuel (42130017)</b>
<b>Organisation: Royal Borough of Windsor &amp; Maidenhead</b>

<b>Response ID: 1122470</b>
<b>Policy / Evidence Base / Part of Plan: Evidence Base - Green Belt Assessment</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Green Belt and Environment In RBWM's Preferred Options response, we said that we supported the conclusions of the stage 2 Green Belt Assessment Report which found that most of the green belt in Spelthorne is performing an important role in terms of the NPPF purposes. However, we added that whilst sub-areas RA-1, RA-2, RA-3, RA-4 and RA-7 close to RBWM perform weakly against most of the green belt purposes, it is however important to note that they are within the SPA buffer area for the reservoirs which are habitat areas for birds and other wildlife. We understand that SBC has subsequently undertaken a Stage 3 Green Belt Assessment to consider specific individual parcels identified for potential release from the Green Belt using a similar methodology used for the Stage 1 and Stage 2 Green Belt Assessments for consistency. The assessment and

subsequent assessment work has concluded that exceptional circumstances have been demonstrated justifying a release of Green Belt for housing development.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ian Motuel (42130017)</b>
<b>Organisation: Royal Borough of Windsor &amp; Maidenhead</b>

<b>Response ID: 1127130</b>
<b>Policy / Evidence Base / Part of Plan: Evidence base - IDP</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
<p>Infrastructure and transport</p> <p>RBWM note that a highways impact assessment has been undertaken by Surrey County Council on behalf of Spelthorne BC to model the potential impacts on the highway network of the Draft Spelthorne Local Plan. The impacts are expected to be local to the developments and not severe, although there are likely to be some cumulative impacts in Staines, Stanwell, Ashford and Sunbury. The Strategic Highways Assessment 2022 suggest some cross boundary impacts on the A30 exit/approach to and from the M25 J12 crossing into RBWM and also B376 Wraysbury Rd crossing boundary into RBWM. As such we would like to understand if any mitigation proposals have been developed to address these impacts and seek to work collaboratively to agree them.</p>

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ian Motuel (42130017)</b>
<b>Organisation: Royal Borough of Windsor &amp; Maidenhead</b>

<b>Response ID: 1119780</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Housing Firstly, RBWM welcome the intention of the Spelthorne Local Plan to identify sufficient capacity to accommodate the Borough’s housing needs in full, as defined by the national standard method. We appreciate that achieving this has involved making difficult choices, including the release of a small amount of Green Belt land. However, we note that the pipeline of 9,438 dwellings is only marginally more than the need of 9,270 dwellings. This is a relatively small ‘buffer’ (about 2%) which does not leave a great deal of contingency for delays and non-implementation that occur during the plan period. This could impact on the ability of the Council to maintain a 5 year housing land supply, a risk that GL Hearn have identified in their ‘Planning for Housing Delivery Report’ which is part of your Local Plan evidence base.

In our response to your Preferred Options consultation, we observed that Stanwell and Stanwell Moor settlements are in close proximity to our borough and that there was a residential allocation (AT1/001, Hitchcock & King, Stanwell Road, Ashford) for about 200 dwellings. We disagreed with SBC's statement that this allocation does not have many constraints. We added that in our view, the location is heavily constrained by Heathrow and the waterbodies SPA. We note that this allocation is no longer proposed as an allocation in the plan and this is welcomed. The only allocations that are close to our mutual boundary are two small brownfield sites (20 units each) in Stanwell Moor and RBWM has no concerns over these in terms of cross boundary impacts.

In the same Preferred Options response, we welcomed the intention of Policy ST2(3) to provide for 20 permanent pitches for Gypsies and Travellers. We note that Policy ST2(3) still seeks to provide for Gypsies and Traveller pitches (and Travelling Showpeople plots and there is also a standalone policy (H3) for meeting the needs of these groups. We note that 3 pitches and 15 plots are proposed on two new allocations, both on former Green Belt land, which will meet the needs for those Travellers who meet the PPTS definition. As RBWM also has identified needs for Gypsies and Travellers and is intending to produce a Traveller Local Plan in order to meet these needs, we welcome the approach of SBC to meet these needs in full. We also appreciate that identifying suitable sites for these disadvantaged groups is challenging and that Green Belt land may need to be considered.

**Question 6:** You can upload any modifications below.

RBWM Response to Spelthorne Reg 19 Local Plan - without inf transp section\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618855/PDF/->

[/RBWM%20Response%20to%20Spelthorne%20Reg%2019%20Local%20Plan%20%2D%20without%20inf%20transp%20section%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618855/PDF/-/RBWM%20Response%20to%20Spelthorne%20Reg%2019%20Local%20Plan%20%2D%20without%20inf%20transp%20section%5FRedacted%2Epdf)

RBWM Response to Spelthorne Reg 19 Local Plan - with T & I section 13.10.22\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618930/PDF/->

[/RBWM%20Response%20to%20Spelthorne%20Reg%2019%20Local%20Plan%20%2D%20with%20T%20%5F%20I%20section%2013%2E10%2E22%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618930/PDF/-/RBWM%20Response%20to%20Spelthorne%20Reg%2019%20Local%20Plan%20%2D%20with%20T%20%5F%20I%20section%2013%2E10%2E22%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Ian Motuel (42130017)</b>	
<b>Organisation:</b> Royal Borough of Windsor & Maidenhead	
<b>Response ID:</b> 1119802	
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Finally, we are pleased to see that the Regulation 19 Spelthorne Local Plan includes a policy (PS1) on responding to the climate emergency. We agree that Local Plans (and planning more generally) must play a key role in addressing the climate emergency by reducing carbon dioxide emissions and supporting the transition to a zero-carbon future. RBWM strongly supports PS1, which we believe is ambitious and appropriate.	
<b>Question 6:</b> You can upload any modifications below.	
RBWM Response to Spelthorne Reg 19 Local Plan - without inf transp section_Redacted.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618859/PDF/-/RBWM%20Response%20to%20Spelthorne%20Reg%2019%20Local%20Plan%20%2D%20without%20inf%20transp%20section%5FRedacted%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618859/PDF/-/RBWM%20Response%20to%20Spelthorne%20Reg%2019%20Local%20Plan%20%2D%20without%20inf%20transp%20section%5FRedacted%2Epdf</a>	

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<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ian Motuel (42130017)</b>
<b>Organisation: Royal Borough of Windsor &amp; Maidenhead</b>

<b>Response ID: 1122473</b>
<b>Policy / Evidence Base / Part of Plan: Policy PS1: Responding to the climate emergency</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Finally, we are pleased to see that the Regulation 19 Spelthorne Local Plan includes a policy (PS1) on responding to the climate emergency. We agree that Local Plans (and planning more generally) must play a key role in addressing the climate emergency by reducing carbon dioxide emissions and supporting the transition to a zero-carbon future. RBWM therefore supports PS1.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

**Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?**

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ian Motuel (42130017)</b>
<b>Organisation: Royal Borough of Windsor &amp; Maidenhead</b>

<b>Response ID: 1119789</b>
<b>Policy / Evidence Base / Part of Plan: Policy SP4: Green Belt</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Green Belt and Environment In RBWM's Preferred Options response, we said that we supported the conclusions of the stage 2 Green Belt Assessment Report which found that most of the green belt in Spelthorne is performing an important role in terms of the NPPF purposes. However, we added that whilst sub-areas RA-1, RA-2, RA-3, RA-4 and RA-7 close to RBWM perform weakly against most of the green belt purposes, it is however important to note that they are within the SPA buffer area for the reservoirs which are habitat areas for birds and other wildlife. We understand that SBC has subsequently undertaken a Stage 3 Green Belt

Assessment to consider specific individual parcels identified for potential release from the Green Belt using a similar methodology used for the Stage 1 and Stage 2 Green Belt Assessments for consistency. The assessment and subsequent assessment work has concluded that exceptional circumstances have been demonstrated justifying a release of Green Belt for housing development.

**Question 6:** You can upload any modifications below.

RBWM Response to Spelthorne Reg 19 Local Plan - without inf transp section\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618858/PDF/->

[/RBWM%20Response%20to%20Spelthorne%20Reg%2019%20Local%20Plan%20%2D%20without%20inf%20transp%20section%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618858/PDF/-/RBWM%20Response%20to%20Spelthorne%20Reg%2019%20Local%20Plan%20%2D%20without%20inf%20transp%20section%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ian Motuel (42130017)</b>	
<b>Organisation:</b> Royal Borough of Windsor & Maidenhead	
<b>Response ID:</b> 1127131	
<b>Policy / Evidence Base / Part of Plan:</b> Policy SP7: Heathrow Airport	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>Infrastructure and transport</p> <p>With regards to Heathrow Airport, improving sustainable transport links from the west and south are essential regardless of the airport expansion in order to mitigate the effects of the airport on local transport networks and achieve a fair distribution of economic benefits, with impacts mitigated for passenger, staff and freight movements. As HSPG member authorities we will continue to work collaboratively through the Heathrow Strategic Planning Group in relation to matters associated with strategic cross boundary transport schemes. As such, RBWM supports these initiatives.</p>	
<b>Question 6:</b> You can upload any modifications below.	
RBWM Response to Spelthorne Reg 19 Local Plan - with T & I section 13.10.22_Redacted.pdf	

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618869/PDF/-/RBWM%20Response%20to%20Spelthorne%20Reg%2019%20Local%20Plan%20%2D%20with%20T%20%5F%20I%20section%2013%2E10%2E22%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Ian Motuel (42130017)</b>
<b>Organisation: Royal Borough of Windsor &amp; Maidenhead</b>

<b>Response ID: 1122465</b>
<b>Policy / Evidence Base / Part of Plan: Policy H3: Meeting the needs of Gypsy, Traveller and Travelling Showpeople</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
In the same Preferred Options response, we welcomed the intention of Policy ST2(3) to provide for 20 permanent pitches for Gypsies and Travellers. We note that Policy ST2(3) still seeks to provide for Gypsies and Traveller pitches (and Travelling Showpeople plots and there is also a standalone policy (H3) for meeting the needs of these groups. We note that 3 pitches and 15 plots are proposed on two new allocations, both on former Green Belt land, which will meet the needs for those Travellers who meet the PPTS definition. As RBWM also has identified needs for Gypsies and Travellers and is intending to produce a Traveller Local Plan in order to meet these needs, we welcome the approach of SBC to meet these needs in full. We also appreciate that identifying suitable sites for these disadvantaged groups is challenging and that Green Belt land may need to be considered.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ian Motuel (42130017)</b>	
<b>Organisation:</b> Royal Borough of Windsor & Maidenhead	
<b>Response ID:</b> 1119794	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E3: Managing Flood Risk	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Flooding In our Preferred Options response, we stated that we would welcome cross LPA cooperation and a consistent approach regarding the River Thames Scheme (RTS) and the associated impacts on the wider area. However, RBWM pulled out of the scheme in 2020 as it was not able to commit to the funding required, and Channel 1 of the scheme (Datchet to Runnymede) was removed from the RTS.	
<b>Question 6:</b> You can upload any modifications below.	
RBWM Response to Spelthorne Reg 19 Local Plan - without inf transp section_Redacted.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618857/PDF/-/RBWM%20Response%20to%20Spelthorne%20Reg%2019%20Local%20Plan%20%2D%20without%20inf%20transp%20section%5FRedacted%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618857/PDF/-/RBWM%20Response%20to%20Spelthorne%20Reg%2019%20Local%20Plan%20%2D%20without%20inf%20transp%20section%5FRedacted%2Epdf</a>	

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<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ian Motuel (42130017)</b>
<b>Organisation: Royal Borough of Windsor &amp; Maidenhead</b>

<b>Response ID: 1119797</b>
<b>Policy / Evidence Base / Part of Plan: Policy EC1: Meeting Employment Needs</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
<p>Employment</p> <p>RBWM raised no concerns in our Preferred Options response to the strategic employment areas at that stage and generally welcome Policy EC1 'Meeting Employment Needs'. However, we raised concerns in respect of the loss of -20,800 sqm of floorspace for B2 employment use and recommended that further work be undertaken to monitor demand and supply trends of employment floorspace and land so Spelthorne can support economic growth and meet employment needs.</p> <p>We understand that the Employment Land Needs Assessment (ELNA) study from 2018 was updated in 2022 and that this has identified a need for 19,109 sqm of employment floorspace, an overall increase of 10,495sqm since the 2018 ELNA. We do acknowledge that the COVID-19 pandemic has created some uncertainty regarding employment land needs and instability in the market, with trends towards greater remote working. In its recently adopted</p>

Borough Local Plan, RBWM has sought to protect its existing stock of employment land as well as allocating new employment sites to deliver sufficient job growth. We are therefore pleased that the overall strategy in the Spelthorne Local Plan is to retain existing employment areas and to review the need for employment land in the five-year review period.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ian Motuel (42130017)</b>	
<b>Organisation:</b> Royal Borough of Windsor & Maidenhead	
<b>Response ID:</b> 1119798	
<b>Policy / Evidence Base / Part of Plan:</b> Policy EC2: Retail	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
We note that Staines is a Major retail centre and that it performs a strong comparison goods role in the wider sub-region with a catchment that extends into Runnymede, Elmbridge and RBWM. However, we also note that whilst Spelthorne BC is actively pursuing regeneration opportunities in its town centres through the Local Plan review in order to improve their offer and choice, you are not looking to significantly alter the position of these centres in the wider retail hierarchy. We would of course be concerned if regeneration at Staines impacted upon the vitality and viability of Maidenhead, Windsor and Ascot centres in the Royal Borough.	
<b>Question 6:</b> You can upload any modifications below.	
RBWM Response to Spelthorne Reg 19 Local Plan - without inf transp section_Redacted.pdf	

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618854/PDF/-/RBWM%20Response%20to%20Spelthorne%20Reg%2019%20Local%20Plan%20%2D%20without%20inf%20transp%20section%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Ian Motuel (42130017)</b>
<b>Organisation: Royal Borough of Windsor &amp; Maidenhead</b>

<b>Response ID: 1122463</b>
<b>Policy / Evidence Base / Part of Plan: Policy ID2: Sustainable Transport for New Developments</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
In our Preferred Options response, RBWM raised concerns over potential impacts for the A308 corridor between the M25 and Windsor; the B376 corridor through Hythe End, Wraysbury and Datchet; and J13 of the M25. These areas are subject to peak hour congestion and/ or have existing air quality management areas. Therefore, they are particularly sensitive to additional traffic movements. RBWM supports the aims set out in Policy ID2 to promote schemes and proposals which facilitate sustainable and active travel, including walking, cycling and public and community transport initiatives. RBWM note that a highways impact assessment has been undertaken by Surrey County Council on behalf of Spelthorne BC to model the potential impacts on the highway network of the Draft Spelthorne Local Plan. The impacts are expected to be local to the developments and not severe, although there are likely to be some cumulative impacts in Staines, Stanwell, Ashford and Sunbury. The Strategic Highways Assessment 2022 suggest some cross boundary impacts on the A30 exit/approach to and from the M25 J12 crossing into RBWM and also B376 Wraysbury Rd crossing boundary into RBWM. As such we would like to understand if any mitigation proposals have been developed to address these impacts and seek to work collaboratively to agree them.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

RBWM Response to Spelthorne Reg 19 Local Plan - with T & I section 13.10.22\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618868/PDF/->

[/RBWM%20Response%20to%20Spelthorne%20Reg%2019%20Local%20Plan%20%2D%20with%20T%20%5F%20I%20section%2013%2E10%2E22%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618868/PDF/-/RBWM%20Response%20to%20Spelthorne%20Reg%2019%20Local%20Plan%20%2D%20with%20T%20%5F%20I%20section%2013%2E10%2E22%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ian Motuel (42130017)</b>
<b>Organisation: Royal Borough of Windsor &amp; Maidenhead</b>

<b>Response ID: 1122471</b>
<b>Policy / Evidence Base / Part of Plan: ST4/025 (Coppermill Road)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
We note that one of the proposed allocation sites (ST4/025: Land at Coppermill Road) is adjacent to RBWM. In September 2021, you contacted me to discuss this site and in my informal response, I stated that as the site is only proposed to deliver about 12 dwellings, any highways impacts would be likely to be localised. I added, however, that SE4/025 is quite open and prominently located on a corner site with trees and as it is next to a roundabout, traffic issues may be an issue.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Michael Mulford (41817121)</b>
<b>Organisation:</b>

<b>Response ID: 1122061</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
<p>PROPOSED DEVELOPMENTS FOR ASHFORD.</p> <p>Whilst the overall development plan addresses the dire need of affordable housing in the borough, and studies the details of the impact and availability of each location on environmental of local services and amenities, we should not miss the opportunity to improve the cultural amenities of the Borough. The proposed Staines leisure centre does not include dedicated facilities for the arts.</p> <p>We should be taking into account not just the facilities for the new arrivals to the area, but also address the lack of currently available cultural amenities. It is deplorable that there are few places existing in the whole borough where a decently sized audience can be admitted and seated. I am thinking of a cinema, and a theatre for small musical or drama events. Even facilities for art exhibitions are limited in choice in the locality. Woking is well blessed with two theatres, and good car parking facilities. Hampton has a decently sized theatre for staging productions, Weybridge also has a small theatre. There is a</p>

nicely appointed music club close to Hampton station. These are all a journey away. It is public houses that provide small group performances venues in the borough.

I live in Ashford, and welcome a growing community, of very cosmopolitan nature in the centre of the town, but presently we have only church halls to accommodate an event of any size. What venue would you book for a single or small group of musicians or dancers to perform, and have facilities, to meet, to park and perhaps snack?

The new plaza and surrounding accommodation deserves better than more parking, shops and flats in the very heart of the town.

PROPOSALS OFFERED FOR CONSIDERATION.

Two proposed developments in Ashford Town currently being offered for consideration by Spelthorne Borough Council are;

Ashford Multi storage carpark. Your ref AT3/007

Telecoms building. Your ref AT3/009

Both are adjacent to the new plaza area.

The multi storage car park is presently unused and closed to the public. There are office facilities at pavement level. When last used the car parking was restricted, lower levels only being available.

The building facade is quite attractive, and would accept some styling modifications. The front offices also could be modified or a market area opened along the front. The lay-by along much of the front is a convenient place for coaches to pull-in to pick up parties of people. The building inside begs for development. Simply, the lower levels could be retained for parking, but badly needs to be better lit and decorated. The top two levels are big areas for development. The needed cultural amenities could easily be accommodated there, perhaps in stages. A performance/ cinema area, and exhibition area could occupy one level, and even the library could be relocated there. The building becomes a cultural centre with a carpark.

The library building, if it did move across the road, could be refurbished to become the replacement for the undersized Studholme Health Centre, or serve as a separate adjunct to the existing health centre.

The development of the telecoms building could simply be converted, without major external changes, to low cost accommodation. Or utilised to extend the Health Centre.

Councils may be requested to provide 'Warm Houses' when the fuel costs become too high, the Telecoms building might serve this necessity. Libraries are mentioned also to offer this facility. This could be the short term answer.

IMPACT ON LOCALITY.

The prime need is for the modifications to be multi-storey car park are designed with two key targets;

1. To ensure owners of 'tires overlooking' (Clarendon Road) houses also have an improved outlook visually. It should also be necessary and possible to ensure that the noise levels of activities are controlled.
2. That the equipment employed for the performance activities is the best available.

Public transport facilities are currently available closeby.

**ADDITIONAL COMMENT.**

The new LIDL Supermarket, when open, will have a adverse effect on Ashford High Street, the surrounding shopping facilities, and traffic movements. The town centre already needs a heart, an open and covered space to relax.  
See attached documents.

**Question 6:** You can upload any modifications below.

Mulford, Michael - sites.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/597334/PDF/-/Mulford%5F%20Michael%20%2D%20sites%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Michael Mulford (41817121)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122062</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy SP2: Ashford, Shepperton and Sunbury Cross	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>PROPOSED DEVELOPMENTS FOR ASHFORD.</p> <p>Whilst the overall development plan addresses the dire need of affordable housing in the borough, and studies the details of the impact and availability of each location on environmental of local services and amenities, we should not miss the opportunity to improve the cultural amenities of the Borough. The proposed Staines leisure centre does not include dedicated facilities for the arts.</p> <p>We should be taking into account not just the facilities for the new arrivals to the area, but also address the lack of currently available cultural amenities. It is deplorable that there are few places existing in the whole borough where a decently sized audience can be admitted and seated. I am thinking of a cinema, and a theatre for small musical or drama events. Even facilities for art exhibitions are limited in choice in the locality. Woking is well blessed with two theatres, and good car parking facilities. Hampton has a decently sized theatre for staging productions, Weybridge also has a small theatre. There is a</p>	



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The new plaza and surrounding accommodation deserves better than more parking, shops and flats in the very heart of the town.

PROPOSALS OFFERED FOR CONSIDERATION.

Two proposed developments in Ashford Town currently being offered for consideration by Spelthorne Borough Council are;

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Telecoms building. Your ref AT3/009

Both are adjacent to the new plaza area.

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The building facade is quite attractive, and would accept some styling modifications. The front offices also could be modified or a market area opened along the front. The lay-by along much of the front is a convenient place for coaches to pull-in to pick up parties of people. The building inside begs for development. Simply, the lower levels could be retained for parking, but badly needs to be better lit and decorated. The top two levels are big areas for development. The needed cultural amenities could easily be accommodated there, perhaps in stages. A performance/ cinema area, and exhibition area could occupy one level, and even the library could be relocated there. The building becomes a cultural centre with a carpark.

The library building, if it did move across the road, could be refurbished to become the replacement for the undersized Studholme Health Centre, or serve as a separate adjunct to the existing health centre.

The development of the telecoms building could simply be converted, without major external changes, to low cost accommodation. Or utilised to extend the Health Centre.

Councils may be requested to provide 'Warm Houses' when the fuel costs become too high, the Telecoms building might serve this necessity. Libraries are mentioned also to offer this facility. This could be the short term answer.

IMPACT ON LOCALITY.

The prime need is for the modifications to be multi-storey car park are designed with two key targets;

1. To ensure owners of 'tires overlooking' (Clarendon Road) houses also have an improved outlook visually. It should also be necessary and possible to ensure that the noise levels of activities are controlled.
2. That the equipment employed for the performance activities is the best available.

Public transport facilities are currently available closeby.

**ADDITIONAL COMMENT.**

The new LIDL Supermarket, when open, will have a adverse effect on Ashford High Street, the surrounding shopping facilities, and traffic movements. The town centre already needs a heart, an open and covered space to relax.  
See attached documents.

**Question 6:** You can upload any modifications below.

Mulford, Michael - sites.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/597336/PDF/-/Mulford%5F%20Michael%20%2D%20sites%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Michael Mulford (41817121)</b>
<b>Organisation:</b>

<b>Response ID: 1124843</b>
<b>Policy / Evidence Base / Part of Plan: AT3/007 (Ashford multi-storey car park, Church Road)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
<p><b>PROPOSALS OFFERED FOR CONSIDERATION.</b></p> <p>Two proposed developments in Ashford Town currently being offered for consideration by Spelthorne Borough Council are;</p> <p>Ashford Multi storage carpark. Your ref AT3/007</p> <p>Telecoms building. Your ref AT3/009</p> <p>Both are adjacent to the new plaza area.</p> <p>The multi storage car park is presently unused and closed to the public. There are office facilities at pavement level. When last used the car parking was restricted, lower levels only being available.</p> <p>The building facade is quite attractive, and would accept some styling modifications. The front offices also could be modified or a market area opened along the front. The lay-by along much of the front is a convenient place for coaches to pull-in to pick up parties of people. The building inside begs for development. Simply, the lower levels could be retained for parking, but badly needs to be better lit and decorated. The top two levels are big areas for</p>

development. The needed cultural amenities could easily be accommodated there, perhaps in stages. A performance/ cinema area, and exhibition area could occupy one level, and even the library could be relocated there. The building becomes a cultural centre with a carpark. The library building, if it did move across the road, could be refurbished to become the replacement for the undersized Studholme Health Centre, or serve as a separate adjunct to the existing health centre. The development of the telecoms building could simply be converted, without major external changes, to low cost accommodation. Or utilised to extend the Health Centre. Councils may be requested to provide 'Warm Houses' when the fuel costs become too high, the Telecoms building might serve this necessity. Libraries are mentioned also to offer this facility. This could be the short term answer.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

**IMPACT ON LOCALITY.**

The prime need is for the modifications to be multi-storey car park are designed with two key targets;

1. To ensure owners of' tire overlooking' (Clarendon Road' houses also have an improved outlook visually. It should also be necessary and possible to ensure that the noise levels of activities are controlled.
2. That the equipment employed for the performance activities is the best available.

Public transport facilities are currently available closeby.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Michael Mulford (41817121)</b>	
<b>Organisation:</b>	
<b>Response ID: 1124844</b>	
<b>Policy / Evidence Base / Part of Plan: AT3/009 (Ashford Telephone Exchange, Church Road)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>The library building, if it did move across the road, could be refurbished to become the replacement for the undersized Studholme Health Centre, or serve as a separate adjunct to the existing health centre.</p> <p>The development of the telecoms building could simply be converted, without major external changes, to low cost accommodation. Or utilised to extend the Health Centre.</p> <p>Councils may be requested to provide 'Warm Houses' when the fuel costs become too high, the Telecoms building might serve this necessity. Libraries are mentioned also to offer this facility. This could be the short term answer.</p>	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No Response	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Mark Munford (41564417)</b>
<b>Organisation:</b>

<b>Response ID: 1124086</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
I do strongly object to any building on the running horse green belt. we have a lot of brown sites in the area that cold be turned into flats or houses . there is absolutely no reason whatsoever to build on any green belt land. I give my support to Ian Beardsmore in this matter. and what about the Debenhams building in staines? can that not be turned into apartments ??
<b>Question 6: You can upload any modifications below.</b>
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Alison Murphy (42037377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1124623</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>Please, please reconsider your draft local plan of putting forward the 15 green belt sites around our wonderful local area, for development. If you go ahead with this plan to build on these sites, you will further increase the effects of the climate emergency we all find ourselves in, not only for now, but for the future of our children. Please reconsider.</p> <p>These plans will change the ecosystem and have massive repercussions for years to come. We should be building less, not more. Please, for the sake of all of us, it's just not needed.</p> <p>Besides the environmental issues this will certainly cause, we are already living on top of each other. We need these green spaces not just for the reasons mentioned above, but also for the mental health of your residents. You will create a very unhappy community.</p>	

Please, please reconsider.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Owen Neal (19819489)</b>
<b>Organisation: Sport England</b>

<b>Response ID: 1116944</b>	
<b>Policy / Evidence Base / Part of Plan: Policy E5: Open Space and Recreation</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: Sport England has concerns about the proposed wording of parts b) and c) of the policy, as in b) it could allow for the loss of sports facilities and playing field to other community uses where the benefit to the community outweighs the harm caused by its
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not consistent with national policy	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Our concerns relate to 2b and 2c of the policy which is not considered to be consistent with para 99 of the NPPF.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Sport England would like to see 2b and c modified to better accord with para 99 of the NPPF to ensure that sports facilities and playing field land are better protected. We do not consider that the policy should provide flexibility to allow for the loss of sports facilities and playing field land to other community uses as long as certain criteria is met. Para 99 is very clear and specific about the circumstances in which sport and recreation provision can be lost. This should be carried across into local plan policy.	

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Owen Neal (19819489)</b>
<b>Organisation: Sport England</b>

<b>Response ID: 1116980</b>	
<b>Policy / Evidence Base / Part of Plan: Policy EC4: Leisure and Culture</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: Sport England is primarily concerned with part 3 of EC4 which relates to the protection of existing leisure facilities. This is considered to encompass major indoor sports provision eg sports halls and swimming pools. Sport England welcomes the policy int
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not consistent with national policy	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Sport England considers that the definition of replacement provision should better accord with NPPF para 99. Currently, replacement provision does not refer to equivalence in quantitative or qualitative terms, rather it focuses solely on suitable location and accessibility. Further, we consider that parts 3a and 3b should not be used to justify the loss of indoor sports provision. This is inconsistent with para 99 of the NPPF and Sport England's own planning principles	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Sport England would like to see 3a and 3b deleted or amended to better reflect the exceptional circumstances under para 99 which permits the loss of sports facilities.	

Sport England is concerned that the proposed wording does not afford the strong national policy protection that indoor sports provision has in the NPPF. The proposed wording would weaken the policy protection at national level.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Owen Neal (19819489)</b>	
<b>Organisation: Sport England</b>	
<b>Response ID: 1120936</b>	
<b>Policy / Evidence Base / Part of Plan: AT1/002 (Land East of Ashford Sports Club, Woodthorpe Road)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>Sport England notes that the proposed site allocation has the potential to prejudice the activities of the neighbouring Sports Club, as the club's activities could affect the residential amenity of the occupants of any new housing. Sport England considers that the agent of change principle applies in this case as set out in para 187 of the NPPF. Any proposed allocation should make clear that any development proposal should robustly assess the amenity impacts eg noise and lighting arising from the site's location adjacent to a sports club. Further, that any proposed development should put in place mitigation measures to address these impacts, and if necessary these measures are then managed and maintained by the applicant.</p> <p>Sport England wishes to avoid a situation where new residents having moved into the new development subsequently make statutory nuisance complaints against the club which then results in action being taken against the club to restrict their operations and activities. These issues should be assessed, considered and if necessary addressed at the planning stage under the principle of development.</p>	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	

Sport England notes that the proposed site allocation has the potential to prejudice the activities of the neighbouring Sports Club, as the club's activities could affect the residential amenity of the occupants of any new housing. Sport England considers that the agent of change principle applies in this case as set out in para 187 of the NPPF. Any proposed allocation should make clear that any development proposal should robustly assess the amenity impacts eg noise and lighting arising from the site's location adjacent to a sports club. Further, that any proposed development should put in place mitigation measures to address these impacts, and if necessary these measures are then managed and maintained by the applicant. Sport England wishes to avoid a situation where new residents having moved into the new development subsequently make statutory nuisance complaints against the club which then results in action being taken against the club to restrict their operations and activities. These issues should be assessed, considered and if necessary addressed at the planning stage under the principle of development.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Owen Neal (19819489)</b>	
<b>Organisation: Sport England</b>	
<b>Response ID: 1120947</b>	
<b>Policy / Evidence Base / Part of Plan: RL1/011 (Land at Staines and Laleham Sports Club, Worple Road)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>Sport England strongly opposes the site allocation without suitable replacement provision.</p> <p>Sport England notes that there is no requirement within the allocation to replace the loss of playing field and sports facilities allocated under Part A. Merely, that proposals will be expected to contribute to improving and enhancing existing sports facilities on Part B.</p> <p>Sport England does not consider this approach is consistent with NPPF para 99 nor is it consistent with Sport England's own playing fields policy. Para 99 of the NPPF part b) and our E4 exception require replacement provision on at least an equivalent basis in terms of quantity; quality and in a suitable location.</p> <p>Therefore, as it stands, Sport England objects to the site allocation.</p>	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No Response	
<b>Question 6: You can upload any modifications below.</b>	

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Lewis Neathey (33568033)</b>
<b>Organisation:</b>

<b>Response ID: 1106920</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
<p>Don't go too big on number of floors. Some taller buildings are fine but please don't over do it! Low rise is preferable.</p> <p>Quality over quantity. As much green space as is possible for wildlife and if you're going to build apartment style they need access to somewhere to be outside in nature. Pedestrianised areas are fantastic and more separated cycle lanes please.</p> <p>Mix of true affordable homes are important (not "affordable" by some bs definition that's not based in reality).</p> <p>I understand the pressure on building new homes and it's importance, particularly starter homes but please keep in mind the long term view, what's going to be best for the community and avoid the mentality of just trying to hit a number or target on new homes. With new homes comes new people and we need to make sure they have good homes and good community facilities. This is an amazing opportunity for Staines, to make the river more of a destination for food and socialising, improve cycle and pedestrian areas and improve green spaces and community areas. Please don't waste it.</p>

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Lewis Neathey (33568033)</b>
<b>Organisation:</b>

<b>Response ID: 1125952</b>
<b>Policy / Evidence Base / Part of Plan: RL1/011 (Land at Staines and Laleham Sports Club, Worple Road)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
RL1/011 (Land at Staines and Laleham Sports Club, Worple Road) Please retain the entire site as Green Belt Part A and B. It's important for the local community to retain playing fields and sports areas. What does: Upgraded sports facilities (Class F2) mean in practical terms for this site?
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
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Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Lewis Neathey (33568033)</b>	
<b>Organisation:</b>	
<b>Response ID: 1125953</b>	
<b>Policy / Evidence Base / Part of Plan: ST4/010 (Riverside car park, Thames Street, Staines)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
ST4/010 (Riverside car park, Thames Street, Staines) and ST4/011 (Thames Lodge Hotel, Thames Street, Staines) Residential (C3): 35 units (approx.) Community Café/ Commercial (Class E): 150 sqm (approx.) Open space linking to Memorial Gardens Residential (C3): 40 units (approx.) (net)Café/ Commercial (Class E): 150 sqm (approx.) For both sites the emphasis and priority should be on cafe / restaurant use - not shopping. Ideal spot for cafe and restaurants with memorial gardens and river. Preferably river views from the restaurants / cafes with outside tables / eating areas.	
<b>Question 6: You can upload any modifications below.</b>	

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Lewis Neathey (33568033)</b>
<b>Organisation:</b>

<b>Response ID: 1125956</b>
<b>Policy / Evidence Base / Part of Plan: ST4/023 (Two Rivers Retail Park Terrace, Mustard Mill Road, Staines)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
ST4/023 (Two Rivers Retail Park Terrace, Mustard Mill Road, Staines)
Is there an opportunity to open a path from here to the Moor ? and make more use of the water/green space this backs on to?
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Lewis Neathey (33568033)</b>
<b>Organisation:</b>

<b>Response ID: 1125954</b>
<b>Policy / Evidence Base / Part of Plan: ST2/006 (Builders Yard, Gresham Road)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
ST2/006 (Builders Yard, Gresham Road) and ST1/037 (Thameside House, South Street) Must include better transport / public foot paths / cycle lanes across the railway into the town centre. Preferably wide style with some trees or green areas. Current options are at the train station or down by the river, neither are particularly bike friendly - a new crossing would make walking into town quicker and more feasible and thus reduce need for local car journeys.
<b>Question 6: You can upload any modifications below.</b>
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Lewis Neathey (33568033)</b>
<b>Organisation:</b>

<b>Response ID: 1125955</b>
<b>Policy / Evidence Base / Part of Plan: ST4/009 (Elmsleigh Centre and Adjoining Land, South Street)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
ST4/009 (Elmsleigh Centre and Adjoining Land, South Street) New library please! and retain a space for bus services.
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Andrew Nelson (41994081)</b>
<b>Organisation:</b>

<b>Response ID: 1124606</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Please save our Green Belt? It was set up by wise people to save our planet.
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

Representations Made Under Regulation 20  
in Representor Order



<b>Respondent: Neda Ngn (40878465)</b>
<b>Organisation:</b>

<b>Response ID: 1124078</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Green Belt: Sunbury Common : Groveley Road I'm writing to you regarding the Spelthorne local plan on running horse green belt on Groveley road in Sunbury. I'm concern about this plan and how its affecting us as people living nearby. The plan is to replace a retirement housing on our greenbelt which I believe its wrong for following reasons. keeping this greenbelt is important as its affecting the environment. As time has gone on, the purpose of Green Belt has also expanded. Originally devised for the purpose of protecting open land, we now know they have masses more benefits, such as tackling issues such as air pollution, slowing and reducing the impacts of climate change and providing essential habitats for wildlife. The Greenbelt helps to direct development where it's most needed; where there are services, like hospitals, schools and roads to make better use of our expensive infrastructure. Limiting urban growth in rural areas saves farmland from being paved and encourages sustainable growth in our cities.

Please consider this as a negative comment on this application. Thank you.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Marian Nicholas (42037473)</b>	
<b>Organisation:</b>	
<b>Response ID: 1124624</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>As residents in Ashford we have grave concerns about the proposal to release 24.81 hectares of green belt. After experiencing the restrictions of the pandemic and discovering how little local green area we have around us we feel that these areas are of great importance for wildlife etc and for the benefit of physical and mental well being.</p> <p>We are asking you not to amend the existing green belt boundaries but to respect them. We reject the Council's classification that certain Green belt areas are "weakly performing" as well as the criteria invented to justify such classification.</p> <p>Also we are very disappointed that the council has refused to designate 19 Green Belt areas, that were proposed by residents, as Local Green spaces and ask the Council to reverse this proposal.</p>	
<b>Question 6:</b> You can upload any modifications below.	

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Lin Nicholls (42011809)</b>
<b>Organisation:</b>

<b>Response ID: 1117531</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Local green space Ashford Town The Wickets I am writing to say why I think we need to keep our green Space in The Wickets The local children need a space where they can run free and kick a ball and not be confined to their small gardens or no gardens in the case of flats. Not only for their physical growth and development but their mental well being....the same said for their parents too. We need a place where we can be in nature and see the sky. It's a quiet place where we can recharge too. It's a valuable place for our community to meet as we did for the Jubilee. We also have 'Wickets ' meetings there from time to time.

It's a safe place to let dogs off the lead- segregated and fenced off from the children's play area.  
It's ecologically important to have spaces and trees to soak up the rain to stop flooding.  
It's well maintained with new equipment recently added and painted.  
There is respect with no social anti behaviour there and very little litter.  
The local play group use it for spots day and other visits.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mike Nicholls (41993761)</b>
<b>Organisation:</b>

<b>Response ID: 1117296</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I think it is important that we keep the recreational space in The Wickets development. The existing childrens' play area is regularly used by both Wickets residents & local children. It has recently been repainted and some new equipment has been installed. The park is respected by those who use it and we have no anti-social behaviour. It is an area which is valued by dog owners as they can safely be let off their lead. It is often used by local residents for small social gatherings and also for community celebrations such as the Jubilee. We regard it as a much-valued space within our local community.
<b>Question 6:</b> You can upload any modifications below.
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Dianne Nicolaou (42037441)</b>
<b>Organisation:</b>

<b>Response ID: 1118059</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
LGS Ashford common: Norman Road I live in Norman road and wish protection of this land as local green space. This land is a valuable source of biodiversity and with the trees helping to contain pollutants from local traffic. It is quite a busy road as used as a cut through to Feltham Hill Road.
<b>Question 6:</b> You can upload any modifications below.
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Sandy O'Shea (41225153)</b>
<b>Organisation:</b>

<b>Response ID: 1111825</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Catherine drive Sunbury We are residents here in Catherine Drive for over 30years Our children have enjoyed the green space in our road as do our grandchildren when they visit . It would be a travesty if any potential Development took place on our much used and appreciated Green space
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
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Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr David Outhwaite (25673313)</b>
<b>Organisation:</b>

<b>Response ID: 1125751</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: This is not a question for the average citizen.
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: Any plan to build on green belt is not sound.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: Again, another question to stop people responding.
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
The evidence has been weighted to give the information that you are looking for, saying green belt is under used is ridiculous, we need all the green space we can get with the volume of people moving into flats.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Leave the green belt and use purely brown field
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr David Outhwaite (25673313)</b>	
<b>Organisation:</b>	
<b>Response ID: 1124599</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: Document is confusing for the average reader. It is legally compliant but faced with a planning application for green belt the council will waiver and grant it with out due consideration and usually against any concerns or objections raised.
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not effective	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
See question 2 response.	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
When faced with an application give due consideration and apply the local and national guidelines. Stop recommending green belt in the plans for future development, that way it would not encourage developers to submit tempting applications that then require residents to objec5 and not everyone knows how to do it effectively.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr David Outhwaite (25673313)</b>
<b>Organisation:</b>

<b>Response ID: 1119434</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
LGS: Ashford I understand that you are currently looking as part of the local plan at green spaces. We cherish our local green spaces and use them regularly for exercise and social activities. Echleforde Recreation Ground (Fairy Field) accessed either by Queens Walk or Sandringham Drive is a peaceful and incredibly popular green space that is a safe haven for children to play games and used but the local community for dog and cat walking and in bringing the whole local community together to celebrate the Queens Jubilee earlier this year with plans already in development for a Christmas event and for the Coronation when announced. Spelthorne do a splendid job of maintaining the space and in supporting our last event. Please protect this space for everyone to use.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Georgina Pacey (42128769)</b>
<b>Organisation: Runnymede Borough Council</b>

<b>Response ID: 1119763</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Housing: RBC is pleased to see that the Pre Submission Local Plan proposes to meet the identified housing needs of Spelthorne in full as calculated through the Government’s Standard Methodology. We note that you propose to meet all of your needs within your own Borough, and are not requesting assistance from any other local authority (including Runnymede Borough Council). RBC supports Spelthorne’s approach to ensuring its identified housing needs are met. Gypsies and Travellers: RBC is also pleased to see that you propose to meet the accommodation needs of your Borough’s Gypsy and Traveller community (as identified in the most up-to-date Gypsy and Traveller Accommodation Assessment (GTAA)) in full. We note that you propose to meet all of your needs within your own Borough, and are not requesting any assistance from any other local authority (including Runnymede Borough Council). RBC strongly supports Spelthorne’s approach to ensuring its identified needs for Gypsies and Travellers are met.

**Question 6:** You can upload any modifications below.

Runnymede Spelthorne Reg 19 pre sub plan response Sept 2022\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618826/PDF/->

[/Runnymede%20Spelthorne%20Reg%2019%20pre%20sub%20plan%20response%20Sept%202022%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618826/PDF/-/Runnymede%20Spelthorne%20Reg%2019%20pre%20sub%20plan%20response%20Sept%202022%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Georgina Pacey (42128769)</b>	
<b>Organisation:</b> Runnymede Borough Council	
<b>Response ID:</b> 1119765	
<b>Policy / Evidence Base / Part of Plan:</b> Policy SP1: Staines-upon-Thames	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Development in Staines Town Centre: I wish to take this opportunity to reiterate comments previously made by RBC in its letter dated 24 <sup>th</sup> May 2021, that Runnymede is supportive of development in Staines Town Centre as this approach is seeking to maximise opportunities for development on brownfield land within Spelthorne, in an area which benefits from a concentration of services and sustainable transport links (and with scope for further improvements). This is in line with paragraph 119 of the NPPF which states that 'Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land'.	
<b>Question 6:</b> You can upload any modifications below.	
Runnymede Spelthorne Reg 19 pre sub plan response Sept 2022_Redacted.pdf	

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Georgina Pacey (42128769)</b>
<b>Organisation: Runnymede Borough Council</b>

<b>Response ID: 1119767</b>
<b>Policy / Evidence Base / Part of Plan: Policy E3: Managing Flood Risk</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
River Thames Scheme: The Council is pleased to see continuing in principal support for this scheme within your pre submission local plan. RBC looks forward to continued joint working with Spelthorne to help deliver this scheme.
<b>Question 6: You can upload any modifications below.</b>
Runnymede Spelthorne Reg 19 pre sub plan response Sept 2022_Redacted.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618990/PDF/-/Runnymede%20Spelthorne%20Reg%2019%20pre%20sub%20plan%20response%20Sept%202022%5FRedacted%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618990/PDF/-/Runnymede%20Spelthorne%20Reg%2019%20pre%20sub%20plan%20response%20Sept%202022%5FRedacted%2Epdf</a>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Georgina Pacey (42128769)</b>
<b>Organisation: Runnymede Borough Council</b>

<b>Response ID: 1119764</b>
<b>Policy / Evidence Base / Part of Plan: Policy EC1: Meeting Employment Needs</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Employment: Through reviewing your consultation document, it is noted that the total need for B class and E(g) (i and ii) floor space is 19,109sqm over the plan period, although this was based on pre COVID projections. Specifically, a target of 15,000sqm of net additional E(g) (i and ii) floorspace is proposed against a need for 18,372sqm, and a target of 14,000sqm of net additional B8 floorspace is proposed against a need for 12,005sqm. It is noted that the consultation document shows a reduction of 11,268sqm as being required in B2 floorspace, but the target is for a loss of 21,000sqm. Having spoken to you, I understand that the latter figure is a typo and a minor modification is proposed to amend this figure to closer to the -11,268sqm required. Also, the Council requests clarification on any identified need for any E(g) (iii) floorspace and the Council's target. In relation to the targets for E(g) (i and ii) and B8 floorspace, the targets are considered to be realistic at this point in time and reflect the overall structural changes currently being observed in the market post the COVID 19 pandemic (which have seen greater levels of home working but a greater

demand for B8 floorspace. It is considered appropriate, in line with Spelthorne's proposal to review whether these targets remain appropriate in the longer term at the first review of the Local Plan. In light of my comments above, the strategy set out to support economic growth as contained in policy EC1 is in my opinion sound. The policy would ensure that economic growth in Spelthorne continues to be supported and facilitated in advance of the first review of the Local Plan.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Georgina Pacey (42128769)</b>
<b>Organisation:</b> Runnymede Borough Council

<b>Response ID:</b> 1119766
<b>Policy / Evidence Base / Part of Plan:</b> Policy ID1: Infrastructure and Delivery
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
However, additional dwellings could have a 'knock-on' effect on nearby infrastructure in or adjoining Runnymede and therefore continuing engagement and co-operation between the Councils in relation to growth implications as identified through transport modelling and relevant mitigations will continue to be important to us as proposals are developed. In particular, it is noted at paragraph 5.38 of the Staines Development Framework (April 2022) which was recently the subject of public consultation that at Staines Bridge, '...the basic principle is to either widen or maintain the existing bridge and provide additional capacity for walking and cycling with another bridge. Linking options to the roundabout (Thorpe Road/Chertsey Lane/The Causeway/ Staines Bridge) in Runnymede should be part of the proposals'. We would wish to engage with you as these proposals are developed given that half of the bridge and the roundabout referred to in paragraph 5.38 are located in our borough.
<b>Question 6:</b> You can upload any modifications below.

Runnymede Spelthorne Reg 19 pre sub plan response Sept 2022\_Redacted.pdf  
<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618991/PDF/-/Runnymede%20Spelthorne%20Reg%2019%20pre%20sub%20plan%20response%20Sept%202022%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Ian Horne &amp; Pam Cole (42037569)</b>
<b>Organisation:</b>

<b>Response ID: 1118063</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
LGS: Ashford Common: Stroud Way We wish to strongly support protecting the small green at Stroud Way/Courtfield Road as a Local Green Space. In a crowded residential area where gardens are generally small, this modest green proves invaluable. It is used regularly by residents in order to walk their dogs or simply to take the air, and by their children as a green area on which to gather and to play. The green is small, yet it provides the street with a valuable taste of tranquillity that must be protected.
<b>Question 6:</b> You can upload any modifications below.
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Suzanne Parkes (25807969)</b>
<b>Organisation: Elmbridge Borough Council</b>

<b>Response ID: 1119564</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Thank you for consulting Elmbridge Borough Council on the Spelthorne Borough Council draft Local Plan (Regulation 19) & Staines Development Framework. In responding to these consultations, the Council has focused its response on the draft Local Plan and its strategic policies that will, and / or are likely, to have cross-boundary implications for our borough and have been the subject of our on-going collaboration under the Duty to Cooperate. Our response also refers to the evidence base that has been prepared to inform and support these policies where appropriate. Strategic Policy ST2: Planning for the Borough Spatial Development Strategy

The Council notes that it is the intention of Spelthorne Borough Council (SBC) to plan for a local housing need requirement of 618 dwellings per annum over the plan period (2022 – 2037); a total of 9,270 new homes. It is also noted that the requirement has been calculated using the Government’s standard methodology for assessing housing need and that a combination of brownfield and Green Belt sites are to be allocated / released from the Green Belt for future development.

In considering SBC’s approach, Elmbridge Borough Council acknowledges that all authorities must assess their housing land supply according to their own individual context including the character and identity of existing settlements and how this can play an important role in the approach to densification and intensification (paragraph 124 of the National Planning Policy Framework (NPPF) (2021).

That said, the Council would query how SBC’s approach to meeting its housing requirement is consistent with paragraphs 11b(ii) and 124 (for example) of the NPPF and how, overall, it has been positively prepared. In other words, pursuing a strategy whereby the draft Local Plan itself states: “the net effect will be to increase housing densities and make Spelthorne a less attractive place to live” and, that development within the town centres will consist of “sterile, high-rise blocks”, “something that no Councillor wants to support”.

The Council appreciates that deciding on a preferred strategy often requires a balance to be struck. However, it would appear that Spelthorne Councillors are not entirely behind the draft Local Plan and have been led by a continued over emphasis on the perceived requirement that its housing need must be met in full and an assumption that “whilst it is appealing to consider producing a Plan that does not meet our need in full, this will not be a sound strategy and would be rejected by the Planning Inspector” (paragraph 2.29 of SBC’s Topic Paper 1: Background to Strategy and case for Exceptional Circumstances to amend Green Belt boundaries).

In regard to the Topic Paper, it is noted that this was published on SBC’s website on 25 July 2022; five weeks after the Regulation 19 Stage started on 15 June 2022. Whilst the Council notes there is still sufficient time to meet the 6-week representation period requirement in accordance with regulations, it would query:

1. How SBC will deal with any representations submitted before 25 July 2022 that have been made without the full evidence available which is fundamental to understanding the strategy of the draft Local Plan?
2. How this evidence base document has informed the preparation of the draft Local Plan and was taken into account in the Council’s decision-making process?

The release of documents throughout the Regulation 19 period appears to be a common theme and, as such, the Council would reiterate the above points in regard to the following documents: Please see attached document for related table.

More fundamentally, the Council would query the robustness of the consideration of exceptional circumstances for the release of the Green Belt and how, and at what stage, this information was taken into account in the decision-making process given the publication date of the Topic Paper. In addition, the Council has concern as to where / how within the process, SBC has taken into account the unmet housing needs of neighbouring authorities.



Paragraph 11b of the NPPF states, “strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless...”

SBC makes reference to Elmbridge Borough Council and its draft Local Plan throughout the Topic Paper; acknowledging our unmet housing need.

However, at no stage does the Topic Paper set out how this was taken into account in forming the preferred spatial strategy for Spelthorne Borough and the weight given to this in determining the amount of Green Belt to be released. For example, did SBC test through its evidence base the possibility of delivering above its Standard Methodology requirement (which has varied over the preparation of the draft Local Plan) in order to assist in meeting potential unmet housing need from neighbouring authorities?

Focusing on the issue of Green Belt, the Council would like to raise two further points.

Firstly, how the strategy aligns / or how SBC has taken into account and considered paragraph 143 of the NPPF which states that when defining Green Belt boundaries, plans should:

“ c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;

e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period”

Secondly, with reference to the document “Discounted Alternative Site Allocations – Officer Site Assessment (May 2022)”, the Council would query the planning justification as to why some sites have been discounted.

For example, HS1/010 - Land to the South and West of Stratton Road, Sunbury and RL1/007 Land off Worple Road, Staines. The concluding text for both sites states: “Although the site contributes to the spatial strategy to a certain degree, it is at odds with some of the site selection criteria in that it is a larger site when compared to other available options, which may not aid distribution of development across the borough. It also received largely negative feedback at the Preferred Options stage. In weighing up whether to take this site forward, the potential housing provision in this location against the reception of the site in the community and impacts on the wider area need to be weighed against one another” (Elmbridge Borough Council’s emphasis).

In terms of size of these sites (HS1/010 and RL1/007), the first site could provide up to 260 units and the second one 256 units. Yet Land to the west of Long Lane and South of Blackburn Trading Estate (a Green Belt site) has been proposed for allocation for 200 units. It is therefore unclear how these sites are to be considered substantially ‘larger’ in comparison to a site that is proposed for allocation and thus discounted. The approach taken appears inconsistent.

As such, it is considered that there could be opportunities for further sites to be allocated within Spelthorne Borough.

Statement of Common Ground

The Council welcomes our on-going collaboration as part of the preparation of our respective draft Local Plans as our two authorities proceed to the Examination in Public stage.

Officers will be in contact to discuss updating or redeveloping the Statement of Common Ground held between the two authorities to reflect our most recent positions.

**Question 6:** You can upload any modifications below.

Elmbridge Borough Council Response\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618929/PDF/-/Elmbridge%20Borough%20Council%20Response%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Oliver Parr (19633057)</b>
<b>Organisation:</b>

<b>Response ID: 1124595</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
I wish to support the Local Plan as proposed
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
No Response
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

Representations Made Under Regulation 20  
in Representor Order

<b>Respondent: Lynn &amp; Peter Parry (41993985)</b>
<b>Organisation:</b>

<b>Response ID: 1124600</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
We understand that Spelthorne Council are planning to potentially release 15 green belt sites within the borough to be turned into building sites. Spelthorne seems to be the only borough within our vicinity that are proposing this rather than protecting our green space, which seems to be decreasing at speed. We need as much green space as possible to counteract ongoing climate change & to give people space to breath. One of these areas appears to be the green in Elgin Avenue. This grassed area is an important area for the locals, is well used by dog walkers and children who play on it. Plus, it protects us from the fumes of cars. Since the introduction of speed bums in both Feltham Hill Road & Chertsey Road, the council has formed a rat run down Elgin Avenue as cars try to avoid the chaos these sleeping policemen have caused. We ask the council not to release any green belt land in this area. There is plenty of building going on and the area is becoming more and more of an urban jungle. There is no justification for this.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Lynn &amp; Peter Parry (41993985)</b>
<b>Organisation:</b>

<b>Response ID: 1117310</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
<p>We understand that Spelthorne Council are planning to potentially release 15 green belt sites within the borough to be turned into building sites. Spelthorne seems to be the only borough within our vicinity that are proposing this rather than protecting our green space, which seems to be decreasing at speed. We need as much green space as possible to counteract ongoing climate change &amp; to give people space to breath.</p> <p>One of these areas appears to be the green in Elgin Avenue. This grassed area is an important area for the locals, is well used by dog walkers and children who play on it. Plus, it protects us from the fumes of cars. Since the introduction of speed bums in both Feltham Hill Road &amp; Chertsey Road, the council has formed a rat run down Elgin Avenue as cars try to avoid the chaos these sleeping policemen have caused.</p> <p>We ask the council not to release any green belt land in this area. There is plenty of building going on and the area is becoming more and more of an urban jungle. There is no justification for this.</p>

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr ALAN PEARSON (41939585)</b>
<b>Organisation:</b>

<b>Response ID: 1116585</b>	
<b>Policy / Evidence Base / Part of Plan:</b> AT1/012 (Ashford Community Centre, Woodthorpe Road) - Pre-submission Spelthorne Local Plan (Reg 19) consultation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: How the hell would I know?
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: Yes	Additional Comments: Whatever that means.
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: Again, how the hell would I know?
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
.	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Ms Heather Pettitt (41097153)</b>	
<b>Organisation:</b> Forestry Commission	
<b>Response ID:</b> 1112425	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E2: Biodiversity	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Local Plans and ancient woodland, ancient trees and veteran trees – Forestry Commission approach The Forestry Commission is not in a position to input into the consultation process for Local Plans. However, the information below is provided to assist you in assessing the appropriateness of sites for future development, and to highlight opportunities for achieving your renewable energy obligations. A summary of Government policy on ancient woodland	
<b>Question 6:</b> You can upload any modifications below.	
2021 Local Authority LOCAL PLAN standard response Spelthorne.docx <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/565807/DOCX/-/2021%20Local%20Authority%20LOCAL%20PLAN%20standard%20response%20Spelthorne%2Edocx">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/565807/DOCX/-/2021%20Local%20Authority%20LOCAL%20PLAN%20standard%20response%20Spelthorne%2Edocx</a>	



**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Sarah Philpott (41826017)</b>
<b>Organisation:</b>

<b>Response ID: 1124248</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Green Belt/Sunbury Common/ Groveley Road. With regard to the Spelthorne Local Plan and the above site in Sunbury, Cllr Ian Beardsmore advises a developer is trying to build 200 homes on the Running Horse Green Belt. I object to the proposal for the following reasons: <ul style="list-style-type: none"> <li>• This is designated Green Belt.</li> <li>• Traffic increase: local road traffic will be increased. Vicarage Rd leading to Sunbury Cross and the BP site already has a very high density of traffic. Today, 5<sup>th</sup> September at 8.20am, the tailback to Sunbury Cross Roundabout on Vicarage Road extended beyond the Hare and Hounds pub - almost to Burgoyne Road. Given any proposal under a Spelthorne Local Plan will be subject to Surrey planning, then we must assume building access and new road</li> </ul>

access will fall completely into Surrey Roads not the adjoining Greater London Roads. With the proposal from the Mayor of London to extend the ULEZ to the outer boundary of Greater London, we can only expect a further increase in these roads from those seeking to avoid charges. What provision has been given to road traffic increases?

- Increased pressure on Utilities: Water and Sewage: The Thames Water area already has water supply issues with local hosepipe bans already in force.. What guarantees are there that water and sewage waste systems have capacity?
- Increased pressure on Utilities: With regard to Electricity supplies, which local grid will be supplying power? Does capacity exist? Recent press information has indicated that there is no capacity for any new housing in neighbouring West London areas for upto 12 years. What capacity planning has been done for all Utilities?
- Schools: Local schools are already at or over capacity, how has this been factored in?
- Medical facilities: Sunbury Health Centre is vastly oversubscribed. How are GP services to be extended? Similarly for Dental care and overall pressure on local hospitals, what assessment has been made for additional medical and dental services?
- Bus services: 235 service through Sunbury and along Vicarage Rd is already heavily utilised especially at peak times Additional bus journeys would need to be provisioned and agreed with London United. What has been done about this?

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Liz Pickering (42118273)</b>	
<b>Organisation:</b>	
<b>Response ID: 1127126</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Evidence base - Viability Assessment	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Not justified, Not effective - were also selected	Additional Comments: Not justified, Not effective - were also selected
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Not positively prepared Not justified, Not effective - were also selected Please find attached a response to your Local Plan Reg 19 consultation, submitted on behalf of the Department for Education. Please note we consider the plan to be unsound aga	Additional Comments: No Not positively prepared Not justified, Not effective - were also selected Please find attached a response to your Local Plan Reg 19 consultation, submitted on behalf of the Department for Education. Please note we consider the plan to be unsound
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Not justified, Not effective - were also selected	Additional Comments: Not justified, Not effective - were also selected
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
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If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	

5. The Viability Assessment makes no allowance for any policy costs associated with education infrastructure delivery. While we might accept that CIL will be the funding vehicle for most developer-funded infrastructure in Spelthorne, due to the size of development sites available, the Infrastructure Delivery Plan (IDP) Part 2 identifies contributions to healthcare and police services through Section 106, with specific costs against each development site. If health and police services are to be funded through Section 106, there is no clear justification for education facilities being treated differently. When housing development generates a demonstrable need for additional education provision, as evidenced by the county council through their pupil yield calculations and assessment of available capacity in existing provision, Section 106 provides ringfenced funding for essential increases Department for Education Sanctuary Buildings Great Smith Street London SW1P 3BT Tel: 0370 000 2288 [www.gov.uk/dfes](http://www.gov.uk/dfes) in education capacity that is necessary mitigation for the impact of development. Whether CIL or Section 106 will be applied, there is no indication in the IDP Part 2 table of what education provision is needed per site, what it will cost, and to what extent this should be funded through developer contributions.

6. We note that forecast capacity in existing primary and secondary schools is likely to meet the needs of housing development over the plan period, so there is no need for the IDP or the Local Plan to set out requirements for additional school provision. However, the IDP Part 1 includes an objectively assessed need for new education provision for young children (early years), sixth form, and specialist school places for children with special educational needs and disabilities (SEND), which are not addressed in the IDP Part 2 table or Local Plan policies. We do not consider that occasional references to “potential education contributions” are sufficient to demonstrate soundness.

#### Early Years

7. The Department has published guidance for local authorities on securing developer contributions for education.<sup>1</sup> This advises that developer contributions should be secured for early years provision where required, including children from birth to the age of four when they start school. The IDP currently only refers to the need for early years provision relating to children between the ages of two and four. Nevertheless, this identifies an early years yield from housing development of 43 places per year, equating to 645 places over a 15 year plan period. If the DfE guidance is applied as recommended, the cost per place for early years provision currently stands at £23,283, before adjusting for inflation. Even using the figure of £9,615 per place as set out in the IDP at present, there is an estimated early years funding requirement of over £6 million, which should be reflected in the IDP Part 2 table, where health and police services have been costed but education is absent.

8. There should be a clear commitment in the IDP, the Local Plan and future Infrastructure Funding Statements that either Section 106 or CIL will help to fund this early years provision. As above, we would question why health and police services appear to be funded through Section 106, but not education, implying that education is a low priority for Spelthorne Borough Council.

#### Special educational needs

9. The IDP identifies a substantial county-wide need for additional specialist school places for children with SEND. The cost of meeting SEND needs across Surrey is estimated at £74m, but it cannot be certain at this stage whether the county council’s capital investment programme or future funding from central government will be sufficient to meet this need.



10. The Spelthorne Local Plan and the IDP should recognise the essential role of CIL in helping to fund this specialist provision. Pupil yields for children with SEND are small compared to those for mainstream education but planned development in Spelthorne might still generate approximately 185 pupils requiring specialist school places, depending on the precise pupil yield figure used by Surrey County Council. At approximately four times the cost of mainstream school places, the specialist school places arising from planned housing development in Spelthorne could cost in the region of £17m. We recommend that Spelthorne Borough Council engages further with Surrey County Council to incorporate the costs of SEND places in the IDP more effectively, and make an explicit statement that CIL will help to fund this significant strategic infrastructure need.

Sixth form capacity

11. The IDP also recognises a need for additional sixth form capacity, but again this is not costed in the IDP. Paragraph 4.52 of the IDP states that funding may be available from CIL or Section 106 to expand Bishop Wand Secondary School; we request that this is strengthened to show clear support for developer contributions funding this provision, through the provision of land and/or financial contributions associated with Policy HS1/012b, and contributions from other developments if required. Including this in the Local Plan's evidence base would strengthen the Council's ability to secure the developer contributions for the delivery of this sixth form facility.

Conclusion

12. I hope the above comments are helpful in finalising the Spelthorne Local Plan, with specific regard to the provision of land and developer contributions for education facilities.

13. The Department recommends that Spelthorne Borough Council works collaboratively with Surrey County Council in the run-up to Local Plan submission and throughout the Examination period, to clarify and attach costs to education requirements, and strengthen the plan's position on education provision as a priority. While we do not consider that the Local Plan is sound in its current form, the issues we have identified could be resolved through a schedule of minor amendments and updates to your IDP.

14. Please notify the department when the Local Plan is submitted for examination, the Inspector's report is published and the Local Plan is adopted. The Department may wish to attend the Examination in Public.

15. Please do not hesitate to contact me if you have any queries regarding this response. DfE looks forward to continuing to work with Spelthorne Borough Council to develop a sound Local Plan which will aid in the delivery of new school places and other education provision.

**Question 6:** You can upload any modifications below.

Spelthorne Local Plan Reg 19 - Redacted DfE response Sep 2022\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618807/PDF/->

[/Spelthorne%20Local%20Plan%20Reg%2019%20%2D%20Redacted%20DfE%20response%20Sep%202022%5FRedacted%2Epdf](https://spelthorne%20Local%20Plan%20Reg%2019%20%2D%20Redacted%20DfE%20response%20Sep%202022%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Yes, I wish to participate in hearing session(s)  
Please notify the department when the Local Plan is submitted for examination, the Inspector's report is published and the Local Plan is adopted. The Department may wish to attend the Examination in Public.

<b>Respondent: Liz Pickering (42118273)</b>	
<b>Organisation:</b>	
<b>Response ID: 1119566</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ID1: Infrastructure and Delivery</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: Please find attached a response to your Local Plan Reg 19 consultation, submitted on behalf of the Department for Education. Please note we consider the plan to be unsound against the criteria of being positively prepared, justified, and effective, though
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Not justified, Not effective - were also selected	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
<ol style="list-style-type: none"> <li>1. We welcome the opportunity to contribute to the development of planning policy at the local level. This response follows our previous representation on the preferred options consultation, dated 17<sup>th</sup> January 2020.</li> <li>2. We would like to offer the following comments in response to the above consultation document. Soundness</li> <li>3. As you will be aware, the primary focus at this stage of the Local Plan's preparation is on the soundness of the plan, with regard to it being positively prepared, justified, effective and consistent with national policy. The following detailed comments set out DfE's view of the plan's soundness in respect of education provision.</li> </ol>	

4. The Local Plan and its evidence base are unclear on how education provision will be delivered. Therefore, the plan does not currently demonstrate that it has been positively prepared in seeking to meet the area's needs, is justified based on proportionate evidence, or is effective in delivering education infrastructure.

**Question 6:** You can upload any modifications below.

Spelthorne Local Plan Reg 19 - Redacted DfE response Sep 2022\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618808/PDF/->

[/Spelthorne%20Local%20Plan%20Reg%2019%20%2D%20Redacted%20DfE%20response%20Sep%202022%5FRedacted%2Epdf](https://spelthorne%20Local%20Plan%20Reg%2019%20%2D%20Redacted%20DfE%20response%20Sep%202022%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Please notify the department when the Local Plan is submitted for examination, the Inspector's report is published and the Local Plan is adopted. The Department may wish to attend the Examination in Public.

<b>Respondent: Mr Ed Pigott (41990785)</b>	
<b>Organisation: SEGRO</b>	
<b>Response ID: 1119575</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: 3.1 As part of their evidence base, the Council has published the following legal and procedural documents: <ul style="list-style-type: none"> <li>• Habitats Regulations Assessment Stage 1 Screening (August 2022);</li> <li>• Duty to Cooperate Statement of Compliance (May 2022); and</li> <li>• Sustainability App</li> </ul>
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: We consider that Policy ST2 is not currently Sound when assessed against Paragraph 35 of the NPPF for the following reasons: (Please see attached document 6.18, page 17)
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: DUTY TO COOPERATE 3.5 Local Planning Authorities are under a Duty to Cooperate (DtC) with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries (NPPF Paragraph 24). To demonstrate effective and on-going jo
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	

6.1 Policy ST2 sets out the spatial development strategy for Spelthorne. It proposes to provide 9,270 dwellings over the plan period, based on a series of new allocations. In terms of economic development, economic growth will be supported by maintaining and intensifying the Borough's employment floorspace offer. This will be done by:

- Safeguarding employment land
- Provision of new land in line with the needs identified through the most up to date evidence; and
- Encouraging its innovative re-use in ways that better meet the needs of the market.

6.2 Within the reasoned justification, the Council do not specifically refer to employment provision. However, they do reference the fact that Spelthorne sits within the a Heathrow focussed Functional Economic Market Area (FEMA). The Council also reference the Runnymede Local Plan, and that it is seeking to provide employment floorspace. It should be noted that, as set out within the Inspector's Report for the Runnymede Local Plan (May 2020) that the employment provisions made are to meet Runnymede's needs only, and are not designed to accommodate wider need. It is also noted the Runnymede will commence an immediate review of their Local Plan, within 5 years of the date of adoption.

6.3 The Council then reference within the monitoring figures for addition office/storage and distribution floorspace. These do not align with the most recent Employment Land Needs Assessment (ELNA) (2022) and should be updated. The impact of this is discussed in more detail below.

6.4 SEGRO believe Spelthorne Council need to review Policy ST2, in relation to the spatial development strategy, in association with the NPPF and their objective employment need, as outlined in their Employment Land Needs Assessment, updated in 2022.

6.5 The Spatial Strategy focuses on the housing requirement across the borough between 2022-2037. This is at the expense of economic growth<sup>5</sup>, notwithstanding the fact the Policy acknowledges that this will be supported, via intensification of the Borough's employment floorspace. The Council acknowledge that economic growth will be maintained and intensified by safeguarding of employment land and provision of new land, in line with needs identified through the most up to date evidence. However, the Council should be more ambitious and proactive in capturing growth within the Borough during the Plan Period, by assessing and analysing current employment land to understand the impact of intensification and what additional floorspace can be realistically achieved by doing so.

Plan Period

6.6 Paragraph 22 of the NPPF outlines that strategic policies should look ahead over a minimum 15 year period from adoption, in order to anticipate and respond to long term requirements and opportunities, such as those arising from major improvements in infrastructure. The emerging Local Plan is predicated on a 15 year Plan Period, running from 2022 to 2037. However, consideration should be had to the time period, accounting for any delays to the preparation of the Local Plan (noting further information is required prior to submission). Therefore, the Council should consider an extension of time to their Local Plan, to account for any delays and thus, allow for a buffer. Consequently, the housing and employment provisions should be re-assessed to the reflect the amended Plan Period.

Employment

6.7 Policy ST2 outlines that economic growth will be supported, however no specific land provision is made in order to achieve this. In addition, Part 7 of EC1 demonstrates that no new allocations envisaged for the Borough as proposals will be directed to the existing Industrial Strategic Employment Areas, Part 7 of EC1 states:

“Proposals for new industrial, warehousing and storage (B2 and B8) floorspace will be directed to the industrial Strategic Employment Areas, to any of the existing industrial estates and to any sites where floor space of this use class is included in the site allocation in the Local Plan.”

6.8 Furthermore, this policy is justified by the ELNA (both 2018 and 2022), stipulating the following:

“The Employment Land Needs Assessment (ELNA), identified a need for a fairly small additional amount of floorspace over the plan period in order to meet the anticipated level of jobs which will be created. Meeting this will meet the identified local Spelthorne need.”

6.9 However, the monitoring indicators state a target of 15,000sqm of net office and research and development space (E (g) (i and ii)) and 14,000sqm of net storage and distribution space (B8) is required. This does not align with the latest ELNA which states 18,000sqm of E(g)(i/ii) and 12,000sqm of B8 floorspace is required. It is also noted that just under 11,000sqm of B2 floorspace will no longer be required, but the ELNA is clear that due to the location and nature of the required floorspace, this B2 floorspace which is no longer required could not be used to accommodate other needs.

6.10 SEGRO consider that the required floorspace realistically cannot be achieved by the outlined spatial development strategy, via maintaining and intensifying the Borough’s employment floorspace offer. No evidence has been demonstrated or presented to show how this additional floorspace will be achieved/provided.

6.11 The NPPF (Paragraph 11 and 20a) states that strategic policies should provide for objectively assessed needs, making direct reference to employment requirements. However, SEGRO do not understand how the Council can make sufficient additional provision of employment space by maintaining and intensifying the existent employment land, which will not align with the identified employment need. Appendix 10 demonstrates all the omitted sites which clearly shows a lack of suitable or available employment sites, illustrating the objectively identified need, is not met through the emerging Local Plan. Therefore, the spatial development strategy needs fundamentally revising and specific employment allocations adding.

6.12 Consequently, Policy ST2 is not in accordance with the NPPF as a lack of provision or identification of land for employment land has been conducted.

6.13 It is also noted that the Council is currently seeking to plan for 9270 dwellings over the plan period, equating to 618 dwellings per year, as required by Paragraph 11 of the NPPF. It is important to consider the infrastructure, services and facilities and employment prospects that are required to support new homes and where best these can be located to ensure a collaborative approach.

6.14 In addition, a recent British Property Federation<sup>8</sup> researched the relationship between housing and warehouse floorspace. It found that there is currently 69ft<sup>2</sup> of warehouse floorspace for every home in England with a requirement for an additional 21 million ft<sup>2</sup> of warehousing floorspace each year to match the Government’s annual target of 300,000 new homes. If we follow this floorspace metric to the number of homes proposed over Spelthorne’s Plan Period, there is a warehousing floorspace requirement of 59,424ft<sup>2</sup> that would need to be planned for, within sustainable locations, in order for employment opportunities to support the growth in number of homes. This is also evidenced as part of the drivers of future floorspace demand (Section 6 of the submitted Employment Land Review – Appendix 5).

6.15 Housing, employment, job creation and service/facilities should therefore be considered as a whole, to ensure a holistic and balanced approach to growth with additional employment space provided as vital infrastructure for new, existing and future residents , contributing towards the achievement of sustainable development within the Spelthorne area.

6.16 Therefore, Policy ST2 should be reviewed, amended and reflected accordingly, to identify potential future employment sites, as part of the Green Belt review, to ensure sufficient employment is available to support the growth in homes and to support economic growth within Spelthorne.

6.17 Without this, unemployment rates within Spelthorne will increase, businesses that require expansion in order to grow further will have to relocate, and new businesses will not be attracted to the area, as a result of the lack of available, suitable premises. As such, the policy does not meet with the requirements of Paragraph 35 of the NPPF. Given this Policy sets out the Council's spatial strategy, and is the fundamental strategy underpinning the Local Plan, revisions should be made prior to submission to ensure suitable employment provision is planned for.

6.18 As such, we consider that Policy ST2 is not currently Sound when assessed against Paragraph 35 of the NPPF for the following reasons: Please refer to attached document for relevant tanles and in depth reps against other policies.

**Question 6:** You can upload any modifications below.

A1 - A11 - all files merged.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/592326/PDF/-/A1%20%2D%20A11%20%2D%20all%20files%20merged%2Epdf>

220920 P1a Hithermoor Quarry Site Representations \_Final\_\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618843/PDF/-/220920%20P1a%20Hithermoor%20Quarry%20Site%20Representations%20%5FFinal%5F%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Frenny Pinto (41768193)</b>
<b>Organisation:</b>

<b>Response ID: 1124238</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Hi , I am writing regarding the subject green belt which is under threat from unscrupulous selfish planning. While the whole world is working to save the planet Spelthorne council is in no hurry to save the green surroundings we are blessed with. This is already causing stress to the residents of the area. We will be deprived of the calming fare reaching views. We value our seclusion and privacy. We want to retain our natural light and beauty. We do not want to be subject to additional traffic and footfalls. I am writing to you to make sure no building takes place on the green belt at Groveley road and Oakhall drive Thank you, Maria

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr David J. Plested (41229057)</b>
<b>Organisation:</b>

<b>Response ID: 1111828</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Local Green Space: Sunbury Common: Catherine Drive Further to the local plan consultation regarding the green area at the end of Catherine Drive, I consider the area should be classified as a "Local Green Space". The green is used by many children to play football and other games and keeps them safe from traffic in addition there are a lot of people that walk their dogs on and around the green and cause no problem to other users. The proposal to build on the green is flawed in the extreme and will cause more problems than it solves. Traffic will increase and parking will certainly become an issue. I respectfully urge you to reconsider the plan and give the green its correct classification as a "Local Green Space".
<b>Question 6:</b> You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

Policy / Evidence Base / Part of Plan: HS2/004 (Land south of Nursery Road)	Sites Years 1-5
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<b>Respondent: Mr Andrew Black (25808385)</b>	
<b>Organisation:</b> PLP Limited	
<b>Response ID:</b> 1155093	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	

These representations are made in response to the Spelthorne Borough Council (SBC) Pre-Submission Local Plan on behalf of PLP who are promoters of Land South of Nursery Road, Sunbury (HS2/004) which has been identified for allocation within the Plan.

The promoters of the site have been in dialogue with the council since early 2019 on the development potential of the site. Pre-application dialogue was undertaken with SBC in May 2019 where it was recommended that the site was submitted under the call for sites, which the promoter subsequently did. A copy of the layout submitted for pre-application discussions is included within the appendix 1 of these representations.

A detailed review of the consultation documents has been undertaken including relevant parts of the supporting evidence base.

Since the previous representations were made for the regulation 18 consultation, further work has been undertaken regarding the delivery of the site. A pre-application meeting was held with Surrey County Council as the Highway Authority and the response is set out within appendix 2 of these representations and referred to in relevant sections.

Overall it is considered that the submission version of the plan is sound when assessed against the requirements of paragraph 35 of the NPPF and the allocation of the site for development is wholly supported.

Please refer to supporting representations.

#### Conclusions

The promoter of this site is satisfied that the Pre-Submission Local Plan is sound and is in compliance with the provisions of the NPPF in terms of Plan Making.

The site as identified within the plan for allocation is clearly appropriate, deliverable and developable. It is free from restrictions of availability and viability and it is therefore anticipated that the site will come forward in the early part of the plan period following adoption.

The promoter of the site looks forward to working with the council throughout the next stages of the Local Plan process and through to the examination process at the appropriate time.

**Question 6:** You can upload any modifications below.

<https://spelthorne.inconsult.uk/gf2.ti/af/1409506/729280/PDF/-/Andrew%20Black%20Consulting.pdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Nicola Powell (41425793)</b>
<b>Organisation:</b>

<b>Response ID: 1111819</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
LGS : Sunbury Common : Heatherlands I am writing concerning protecting the green space in Heatherlands. Having lived here for 54 years, as a child and adult, Heatherlands has a real sense of community with neighbours looking out for each other. The green space is essential for children as the gardens are quite small and it gives them a space to play and meet with their friends. This is something I was able to do, as were my own children, which was invaluable. The green space is used not only by children, but also during COVID lockdown it became a space for neighbours to see each other at a distance, the area has also been used for street parties in the past to celebrate significant events, this is marked by the plaque from the Queens Jubilee in 1977.

Another issue is the sewer system, we often have the waste pipes blocked and require them to be cleared by professionals and these pipes go through the middle the green area.  
We also have an issue with parking. Since the continuous developments on Vicarage Road where insufficient parking is not allocated, people use Heatherlands to leave their vehicles.  
I have seen many areas of green space built on in Sunbury over the years and feel that we need to keep the areas we currently have.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Pamela Powell (42099905)</b>	
<b>Organisation:</b>	
<b>Response ID: 1119431</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
LSG : ASHFORD COMMON : CHESSHOLME ROAD I am writing in regards to the green space on Chessholme Road, Ashford. This green space is a calming place to live in a turbulent world. I have lived here for 60 years. This green space is safe for residents children to play and to exercise their dogs.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Sandra Prior (42012353)</b>
<b>Organisation:</b>

<b>Response ID: 1125967</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
I would like the Council to protect the 19 Green Belt areas and other rejected sites that were proposed by residents as Local Green spaces due to their particular importance to the local community.
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Sandra Prior (42012353)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117536</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
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No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
I would like Spelthorne Borough Council to protect the Local Green Spaces in all the remaining protected urban open spaces (PUOS) that are still in existence and have not as yet been built on (nor are currently being built on) including school playing fields, private sports grounds, allotments, the Staines Reservoir Aqueduct, Stanwell Quarry, Duncroft, Wraysbury Road in Staines, the Grounds of Sunbury Court and Spelthorne Grove in Ashford. Also I would like the Council to protect the 19 Green Belt areas and other rejected sites that were proposed by residents as Local Green spaces due to their particular importance to the local community.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Sandra Prior (42012353)</b>
<b>Organisation:</b>

<b>Response ID: 1125959</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
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If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I would like the Council to protect the 19 Green Belt areas and other rejected sites that were proposed by residents as Local Green spaces due to their particular importance to the local community.
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Paul Pritchard (19752161)</b>	
<b>Organisation:</b>	
<b>Response ID: 1124065</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
It will destroy a vital section of local green belt and permanently and negatively change the character of the local area. It will also hugely impact on traffic in the local area between Sunbury Cross and Hampton court via Hampton which is already heavy during rush hour and at weekends. Finally, it will have a devastating effect on all local infrastructure including, but not limited to, Sunbury Health Centre, which is already struggling with demand, and local schools.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No Response	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Paul Pritchard (41825857)</b>	
<b>Organisation:</b>	
<b>Response ID: 1124066</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
It will destroy a vital section of local green belt and permanently and negatively change the character of the local area. It will also hugely impact on traffic in the local area between Sunbury Cross and Hampton court via Hampton which is already heavy during rush hour and at weekends. Finally, it will have a devastating effect on all local infrastructure including, but not limited to, Sunbury Health Centre, which is already struggling with demand, and local schools.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No Response	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Carol Prouse (41229441)</b>
<b>Organisation:</b>

<b>Response ID: 1124087</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
LGS/Sunbury Common --- Green belt/Sunbury Common/Groveley Road Green belt/Sunbury Common/Groveley Road which with the Running horse and the shops in close proximity is used and appreciated by so many folks.
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Carol Prouse (41229441)</b>
<b>Organisation:</b>

<b>Response ID: 1111826</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Local Green Space : Sunbury Common: Catherine Drive These comments are regarding our --- Local Green Space : Sunbury Common: Catherine Drive This green space is used by local residents and others regularly, daily or even 4 or 5 times a day by some who have dogs to walk. The resident's children and their friends play there most day too. They share all sorts of games from football, Bicycling, Running races, Tag, 3legged races, and even mini competitions organised by the adults for them. We have had gatherings of residents just for a social occasion half a dozen times this year; and that's really great as folks get to make new friends , meet neighbours they've never even spoken to before this year. We had a very successful MacMillan day last year and raised over £750 - couldn't have happened without everyone pulling

together!

Families also have family functions - picnics, parties etc , which is lovely to see: and lovely that the trees give shade for these things to take place around and on the green.

People also walk around the green for quiet chats and catch ups, or some run around the green for exercise.

This is an invaluable asset to our close and would be sadly missed if no longer there!!!

WE Hope and pray that this is never the case!!!

LGS/Sunbury Common --- Green belt/Sunbury Common/Groveley Road

I am writing concerning LGS/Sunbury Common/Catherine Drive/Heathcroft Avenue/Sunbury Cross Skate Park/Kenyngton Drive and Green belt/Sunbury Common/Groveley Road

My husband and I live in Catherine Drive and have been here since 1980. It has been a lovely road to live in - happy, friendly, not too busy and a real Community!

The Green in our road has all sorts of uses and is an invaluable space for all the residents and would be sorely missed if it were to be altered in any way. Heathcroft Avenue's Green space is equally valuable. Many of us pass through this road so frequently and have been able to admire the wild flowers sown there!

Sunbury Cross Skate Park is an invaluable source of space for youngsters to exert their energy and keep out of trouble

Kenyngton Drive has the Park, where we walk everyday, and many others walk their little dogs - making friends and building community and is so near to :-

Green belt/Sunbury Common/Groveley Road which with the Running horse and the shops in close proximity is used and appreciated by so many folks.

This would also effect pressure on Doctors surgeries , who are already overloaded, and similarly Schools and general amenities

Please do your very best to keep these areas safe and protected for all of us

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Keith Pryke (42099809)</b>	
<b>Organisation:</b>	
<b>Response ID: 1119430</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
LGS : Ashford Common : Elgin Avenue It has been brought to my attention that the grassed area at the junction of Elgin Avenue and Cecil Road is earmarked for reclassification as Local Green Space. I would like to indicate my opposition to this change. This piece of land is unsuitable for any future developments since it will restrict light to existing properties and spoil the openness enjoyed by local residents.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Tomas Pugh-Cook (42131713)</b>
<b>Organisation: Reigate and Banstead Borough Council</b>

<b>Response ID: 1119822</b>
<b>Policy / Evidence Base / Part of Plan: Evidence base - GTAA; SLAA;Duty to Cooperate</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: Yes
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: Yes
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: Yes
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Thank you for engaging with Reigate & Banstead Borough Council (RBBC) regarding the Pre-submission Spelthorne Local Plan. RBBC understands that Spelthorne Borough Council (SBC) have progressed the Local Plan to prepare for submission to the Planning Inspectorate for examination. We note as part of the duty to co-operate we sent a response dated 15 June 2020 which detailed RBBC's position of being unable to meet SBC's identified unmet need. In accordance with Paragraph 33 of the revised NPPF, RBBC has an up-to-date Local Plan consisting of a Core Strategy (adopted in July 2014 and 'reviewed in July 2019) and Development Management Plan (DMP) (adopted September 2019). Due to local constraints, RBBC has a local unmet need of c2,100-2,700 dwellings which means that we are unable to accommodate any potential needs within the existing local plan. Consequently, RBBC can confirm that whilst it remains committed to maximising its housing supply and working with nearby local authorities to understand how housing needs can be met as fully as possible, RBBC is unable to accommodate any of SBC's potential unmet needs.

It is understood that you have assessed the need for additional homes over the plan period using the 2014 based household projections as part of the government's standard methodology, in accordance with the NPPF and PPG for calculating local housing need. We note that SBC have identified a housing requirement of 618 dwellings per annum over, with a total of 9,270 during the plan period (2022 – 2037). We also note that the SLAA and the Green Belt Assessment Report have been used as key evidence documents to inform the sites identified for potential allocation in the Local Plan. Para 3.12 of the SBC Pre-submission Local Plan highlights that Spelthorne sits within a housing market area with Runnymede Borough Council. Additionally, RBBC's most recent assessment 'East Surrey SHMA' (2008) (with update report produced in 2012) does not identify Spelthorne within RBBC's housing market area. It is also noted that SBC maintains strong economic links with Runnymede, Elmbridge and the London Boroughs of Hillingdon & Hounslow. Therefore, we feel there is limited purpose to work together on our potential issues in this aspect, and we feel that we have no comment to make on a significant basis. Similarly, within SBC's Gypsy and Traveller Accommodation Assessment (GTAA) (2018), the report produced by Opinion Research Services, acknowledges RBBC working with Tandridge and Elmbridge on any cross boundary issues on a joint GTAA. We therefore do not feel the need to make any comment on this basis. Notwithstanding, RBBC remains committed to joint working as part of ongoing duty to co-operate discussions on strategic matters. Should you have any queries, we would be very happy to discuss any of the points raised in more detail.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Mike Ramlakhan (42029025)</b>
<b>Organisation:</b>

<b>Response ID: 1117932</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
We note that the Council Local Plan Team has included the following sites for designation as Local Green Spaces and to receive the formal planning protections that such designation affords them:- 1. The open Space at the Brooklands Development off Church Road, Ashford; 2. Scott Freeman Green on Stanwell Road, Ashford 3. The recreation land at the Wickets, Ashford. We agree that these locations are critical to be protected, and are highly valued by local residents and fully support these designations. I would also like to take the opportunity to thank you for all your hard work on the local plan, this is appreciated by the residents of Spelthorne. Furthermore:

Please find the attached detailed submission for Local Green Space, the submission contains location map, photo, reason and contact details.  
This location is critical to be protected, and is highly valued by local residents.

**Question 6:** You can upload any modifications below.

Gething, Islam, Ramlakhan - Opposite St. Hildas Church on Stanwell Rd.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619715/PDF/-/Gething%5F%20Islam%5F%20Ramlakhan%20%2D%20Opposite%20St%2E%20Hildas%20Church%20on%20Stanwell%20Rd%2Epdf>

Gething, Islam, Ramlakhan - St Hildas Churchyard.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619716/PDF/-/Gething%5F%20Islam%5F%20Ramlakhan%20%2D%20St%20Hildas%20Churchyard%2Epdf>

LDF Ashford Close AshT 2209p NI\_NG\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619717/PDF/-/LDF%20Ashford%20Close%20AshT%202209p%20NI%5FNG%5FRedacted%2Epdf>

LDF Echleforde Park AshT 2209p NI\_NG\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619718/PDF/-/LDF%20Echleforde%20Park%20AshT%202209p%20NI%5FNG%5FRedacted%2Epdf>

LDF Fairholme Road AshT 2209p NI\_MR\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619719/PDF/-/LDF%20Fairholme%20Road%20AshT%202209p%20NI%5FMR%5FRedacted%2Epdf>

Gething, Islam, Ramlakhan - Land either side of entrance to West Close.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619720/PDF/-/Gething%5F%20Islam%5F%20Ramlakhan%20%2D%20Land%20either%20side%20of%20entrance%20to%20West%20Close%2Epdf>

Gething, Islam, Ramlakhan - Land on Village Way.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619721/PDF/-/Gething%5F%20Islam%5F%20Ramlakhan%20%2D%20Land%20on%20Village%20Way%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Sarah Rayfield (25650721)</b>
<b>Organisation:</b> British Horse Society

<b>Response ID:</b> 1122480
<b>Policy / Evidence Base / Part of Plan:</b> Policy ID1: Infrastructure and Delivery
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Furthermore, we would ask the Council to consider using CIL money arising from future developments to improve the off-road network for higher status users of the PROW in the area which would benefit both the existing and new residents.
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response



If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Sarah Rayfield (25650721)</b>
<b>Organisation:</b> British Horse Society

<b>Response ID:</b> 1122490
<b>Policy / Evidence Base / Part of Plan:</b> Policy ID1: Infrastructure and Delivery
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
<p><b>SAFETY</b></p> <p>Road Safety is a particular concern to equestrians, who are among the most vulnerable road users. Last year, the BHS received reports of 2,943 road incidents, in which 66 horses died and 129 were injured. 13% of riders reporting an incident were victims of road rage. Research indicates however that only 1 in 10 incidents are being reported to the BHS; in 2020-21 alone, 2,876 horse riders and carriage drivers in England and Wales were admitted to hospital after being injured in transport accidents. (NHS Hospital Episodes Statistics).</p> <p>The BHS actively campaigns to improve road safety by making motorists aware of what to do when they encounter horses on the road (see <a href="https://www.bhs.org.uk/support-us/our-campaigns/dead-slow/">https://www.bhs.org.uk/support-us/our-campaigns/dead-slow/</a> – we recommend taking a few minutes to watch the ‘Dead Slow’ virtual reality film for an impression of how vulnerable equestrians are in proximity to cars and lorries).</p> <p>Because of the difficulties that equestrians encounter on roads, they avoid using them wherever possible. Road use is almost always unavoidable as in many places the equestrian Rights of Way network (if there is one) is fragmented, often as a result of the most heavily used routes being adopted as</p>

vehicular highways, and roads are often the only available links between one RoW and the next. Connecting off road routes should therefore be given a high priority in the interests of ALL vulnerable road users.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Sarah Rayfield</b> (25650721)
<b>Organisation:</b> British Horse Society

<b>Response ID:</b> 1126876
<b>Policy / Evidence Base / Part of Plan:</b> Policy ID2: Sustainable Transport for New Developments
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
<p>a. Inclusion of equestrians in the Active Travel Strategy and open space or non-motorised user provisions</p> <p>The term ‘Active Travel’ applies to journeys undertaken for a range of purposes, whether to reach a place of work or local amenities, or for recreation. It is also the case that many of the routes that are used to walk or cycle to work or school are the same routes which at other times provide for recreational use.</p> <p>It is now acknowledged that horse-riding is as much an ‘active travel’ mode as recreational walking or cycling. At the recent Parliamentary Debate on Active Travel in Westminster Hall, Robert Courts MP proposed that “horse riders...ought to be thought about in the context of active travel as well.” This was endorsed by Michael Ellis, Minister of State for Transport, who confirmed that “Active travel includes horse riders and bridle paths – this debate includes them.”</p> <p>Cambridgeshire and Peterborough Council has defined Active Travel as “Physically active modes such as walking, or horse riding. It also includes walking or cycling as part of a longer journey.” (See Cambridge and Peterborough report) We therefore suggest that, where active travel or facilities for non-</p>

motorised users are considered, equestrians should be included unless there is research based evidence to exclude them. If there are concerns about a specific proposal, then we would be happy to advise.

b. Hampshire Countryside Access Forum (HCAF) guidance Equestrians in Hampshire

The HCAF has developed this guidance for planners and developers in response to feedback from local authorities, which indicated that they would welcome more information about how they can include equestrians in their work, engagement and consultation.

Written by members of HCAF with support from Hampshire Countryside Service and the BHS, this document has been widely circulated within and beyond Hampshire, sparking interest from other authorities outside the county. We urge Spelthorne Borough Council to incorporate the principles set out in this guidance into their planning policy: most particularly, that equestrians should be considered and consulted with at an early stage within the planning of any major housing or infrastructure development. This should include any proposed new multi-use routes.

**BENEFITS TO THE ECONOMY**

The 2019 national survey by the British Equestrian Trade Association (BETA) – which represents more than 800 member companies) concluded that nationally the equestrian sector (excluding the racing industry) was worth £4.7 billion a year to the UK economy<sup>1</sup>. Based on an estimated horse population of 847,000, this represents just over £5,500 per horse.

There are just under 128,000 registered equine passport holders in the south east, indicating a contribution to the south east's economy of over £700 million per annum. We therefore suggest that the consideration of equestrians within the plan would help to maintain this financial contribution to the economy.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Sarah Rayfield</b> (25650721)
<b>Organisation:</b> British Horse Society

<b>Response ID:</b> 1127166
<b>Policy / Evidence Base / Part of Plan:</b> Policy ID2: Sustainable Transport for New Developments
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
<p>THE HEALTH BENEFITS OF HORSE RIDING AND ASSOCIATED ACTIVITIES</p> <p>(Data comes from research undertaken by the University of Brighton and Plumpton College on behalf of The British Horse Society)</p> <ul style="list-style-type: none"> <li>• 68% of questionnaire respondents participate in horse riding and associated activities for 30 minutes or more at least three times a week. Sport England estimate that such a level of sporting activity will help an individual achieve or exceed the government’s recommended minimum level of physical activity.</li> <li>• Women have been identified in government studies as a social group with relatively low levels of participation in physical activity. Some 93% of questionnaire respondents were women and 49% of female respondents were aged 45 or above. These are comparable figures to a major Sport England</li> </ul>

survey which found that 90% of those participating in equestrianism are women and 37% of the female participants in equestrianism are aged 45 or above. The gender and age profile of equestrianism is not matched by any other sport in the UK .

- Amongst the horse riders who took part in the survey, 39% had taken no other form of physical activity in the last four weeks. This highlights the importance of riding to these people, who might otherwise be sedentary.
- Horse riders with a long-standing illness or disability who took part in the survey are able to undertake horse riding and associated activities at the same self-reported level of frequency and physical intensity as those without such an illness or disability
- Horse riding stimulates mainly positive psychological feelings.
- Horse riders are strongly motivated to take part in riding by the sense of well-being they gain from interacting with horses. This important positive psychological interaction with an animal occurs in a very few sports. Being outdoors and in contact with nature is an important motivation for the vast majority of horse riders.

We therefore suggest that the inclusion of equestrians in provision for other non-motorised users unless there is an evidence based reason to exclude them would help to maintain the health and wellbeing of a sector of the population known to be at risk.

#### CONCLUSION

##### National Planning Policy Framework

Paragraph 92 says, “Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: © enable and support healthy lifestyles, especially where this would address identified local health and well-being needs...”

And Paragraph 98 says, “[...] Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, ...”

Horse riding is a year-round activity which, along with associated activities such as mucking out and pasture maintenance, expends sufficient energy to be classed as moderate intensity exercise. The majority of those who ride regularly are women, and a significant proportion of riders are over 45, a demographic who, if not for this sole form of exercise, would otherwise be considered at risk. Furthermore, the benefits of exercising with horses or dogs promotes wellbeing and happiness by activities with and closeness to these animals.

Paragraph 100 says, “Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.”

Equestrianism is a popular activity in Surrey and one which contributes significantly to the local economy. Whilst Spelthorne is not an especially rural or equestrian area, the Council can help to improve access issues through good planning of future development. We hope therefore that the Local Plan will include policies that will support equestrians by default within their travel and recreation plans.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Gavin Rendall (25195073)</b>
<b>Organisation:</b>

<b>Response ID: 1124601</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I am writing to draw to your attention my concern over the proposal for the inclusion of Green Belt for development in the draft local plan. My reasons for objecting are as follows and as I'm assuming you will be inundated with similar emails, I'll keep it brief! 1. The Government is not forcing Spelthorne or any other local authority to agree a plan which includes Green Belt. 2. I reject the contrived concept of 'grading' Green Belt. Such open space is protected from development in law and the Council should please respect this. You are custodians of this precious national heritage and our environment. All Green Belt land performs one or more important function if only to check the unrestricted sprawl of large built up areas. I do not accept that there are 'exceptional circumstances' to justify the release of this land.

3. I do not believe that the council has a mandate from the people to allow development in this way – How many emails have you had from residents (who are not developers) urging you to release Green Belt?
4. Spelthorne is already overcrowded, polluted and congested. Why is the Council seeking to make this worse rather than trying to protect our environment and defend the interests of the people it represents?
5. With particular regard to the sites off Nursery Rd, Sunbury, I believe that this area cannot take any further development. There are already four schools in or adjoining this road and it's highly congested as it is. With all due respect to Surrey CC Highways Dept, I understand that they rarely, if ever, give adverse traffic impact assessments for the simple reason that they do not have a budget to defend their decisions against wealthy developers in Court.
6. The government's proposed Bill to Level Up The Nation promises that it will deliver new reforms to the planning system, ensuring new development is more beautiful, produces more local Infrastructure, is shaped by local people's democratic wishes, improves environmental outcomes, and occurs with neighbourhoods very much in mind. The draft local plan appears to go against these principles insofar as it does not provide for adequate local infrastructure, has paid scant regard to local people's democratic wishes and does not address local neighbourhood issues such as pollution, congestion, GP surgeries and schools.
7. Lastly, I am disappointed that the Council has also refused to designate 19 Green Belt areas (that were proposed by residents) as Local Green spaces and I would ask the Council to reverse this refusal.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Judy Rendall (25651873)</b>
<b>Organisation:</b>

<b>Response ID: 1124605</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Please save our remaining green belt, so that Spelthorne, can keep green and eco friendly. Protect our clinics, hospitals, schools and roads from overload. Keep it breathable and beautiful.
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Andy Richards (41129985)</b>	
<b>Organisation:</b>	
<b>Response ID: 1125654</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: Too many additional people are to be housed. There should be no more high rise development. It is unclear how the needs resulting from housing all these extra people will be met.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: Too many additional people are to be housed. There should be no more high rise development. It is unclear how the needs resulting from housing all these extra people will be met.
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Too many additional people are to be housed. There should be no more high rise development. It is unclear how the needs resulting from housing all these extra people will be met.	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Yes. Too many additional people are to be housed. There should be no more high rise development. It is unclear how the needs resulting from housing all these extra people will be met.

<b>Respondent: Mrs Ann Richards (41397057)</b>
<b>Organisation:</b>

<b>Response ID: 1124084</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
GreenBelt/SunburyCommon/Groveley Road With regards to the planning application to build 200 homes on the Running Horse Green Belt land. I object to the building on this land and the reason are as follows, firstly I have lived in Sunbury common all my life and have seen more and more house/flat dwellings being built even back gardens have been taken and built more flats/houses eg cavendish road and green leas in Sunbury common, more houses have been demolished and flats built on the land. We have no doctors and only one infant/junior school. Kenyngton Manor infant school was demolished and houses built in the land. And kenyngton manor senior school was changed to infant and juniors only. And the senior school children had to find other schools to attend. The lack of Parking and traffic are horrendous. Anti social behaviour is at an alarming rate. And burglary's are at a high.

Therefore to build 200 homes is unacceptable, and not fisable. The over crowding and parking will be even worse. The drainage can't cope now! The subway is falling apart and always flooded in winter, infact this year the water has been pouring into the subway from Sunbury cross (Greggs bakers side) all summer. Therefore we have no choice but to take our lives into our own hands and cross over the roundabout. So what would it be like if this was agreed?

This land needs to be redeveloped for the people of Sunbury common maybe the park behind it could be brought forward so it can be seen from the main road and therefore people would feel safer using it. And maybe a flower/seating area for the elderly? The whole way along vicarage road is what we call concrete jungle as it's all been built on and more still to come. The community unit of which Jacqueline's garden is using I believe is always being looked at for more flats. The bungalow opposite now has houses on it with no parking and therefore they use the surrounding roads.

Please start to treat Sunbury common the same as lower Sunbury, the people are just as important and have the same needs. We have more flats and social housing at Sunbury common then Sunbury as a whole. The roads around Sunbury common come to a standstill still now.

Please rethink this proposal and object to it going ahead as this will have a detrimental effect to our homes and our well-being. Plus our children will have to fight even hard for school places and to register for the doctors.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mrs Ann Richards (41397057)</b>
<b>Organisation:</b>

<b>Response ID: 1111758</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
LGS: Sunbury Common : Heatherlands I wish for the above LGS for Heatherlands Sunbury Common to be protected from future development and have a LGS protection placed on it. The reasons for this is children use the green space for picnics and playing. Also we have had jubilee parties, platinum party, the elderly residents sit on the green and chat to the neighbours and that keeps them from being Lonely and feeling apart of our road/neighbourhood. We have also had covid chats around the green (at a safe distance) and the nhs clapping each night and made sure we keep it nice and tidy. This road needs to keep the green protected for all of the neighbours to keep feeling apart of our road/ neighbourhood. I have lived in Sunbury common all my life (59 years) and i have seen more and more green space areas taken away, including back gardens. We need to start supporting and keeping the last pieces of green spaces in Sunbury common.

I am very concerned for sunbury common as it's the forgotten part of the borough.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Richborough Estates (42188193)</b>
<b>Organisation:</b>

<b>Response ID: 1127876</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST1: Presumption in Favour of Sustainable Development
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not justified. Not effective, Not consistent with national policy -were all selected. EXAMINING PLANS The NPPF (paragraph 35) requires that any plan submitted to the Secretary of State for examination must be capable of being found both legally compliant and sound. This places various duties on the Council including, but not limited to, ensuring the plan is: <ul style="list-style-type: none"> <li>• Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</li> <li>• Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</li> <li>• Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</li> </ul>

• Consistent with National Policy – enabling the delivery of sustainable development in accordance with the policies in this Framework. It is therefore critical that the Local Plan sets a clear path between the identification of the strategic priorities and the allocation of land to facilitate the delivery of these priorities. However, as currently drafted, we have significant concerns that it doesn't. Furthermore, the NPPF (paragraph 61) is clear that Local Planning Authorities must seek to address their Local Housing Need ('LHN') as a minimum and this is addressed below.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

It is therefore critical that the Local Plan sets a clear path between the identification of the strategic priorities and the allocation of land to facilitate the delivery of these priorities.

Please see enclosed letter that provides the composite response.

**Question 6:** You can upload any modifications below.

Emery Planning - Housing Land Supply Assessment (As submitted - 20.09.22).pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/614878/PDF/-/Emery%20Planning%20%2D%20Housing%20Land%20Supply%20Assessment%20%5FAs%20submitted%20%2D%2020%2E09%2E22%5F%2Epdf>

Richborough Estates - Pre-Submission Local Plan\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618783/PDF/-/Richborough%20Estates%20%2D%20Pre%2DSubmission%20Local%20Plan%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Please see enclosed letter and response to Section 6 above – part of the discussion at Examination would be to highlight a deliverable site (Land north of Charlton Road – LS1/020) that the Council has ignored/omitted.

<b>Respondent: Richborough Estates (42188193)</b>	
<b>Organisation:</b>	
<b>Response ID: 1127878</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST1: Presumption in Favour of Sustainable Development	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Not justified, Not effective, Not consistent with national policy - were also selected Whilst we support the decision of the Council to extend the Local Plan from 2035 to 2037 with a start date of 2022, given protracted examinations for Local Planning Authorities that are faced with similar constraints (the Green Belt) in areas like Tandridge and Welwyn Hatfield, we consider it unlikely that the Local Plan will be submitted, examined, and adopted over the next 12 months, with an adoption date more likely to be 2024 or indeed 2025. Please see enclosed letter that provides the composite response.	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<b>PLAN PERIOD</b> With the NPPF (paragraph 21) requiring strategic policies “should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure”, we suggest the end date is extended to	

allow for a protracted examination and to ensure the Local Plan is in accordance with the NPPF. Furthermore, with major infrastructure projects like Heathrow still on the horizon, to ensure the Local Plan is positively prepared, it is vital that an end of date of at least 2039/2040 is used. Please see enclosed letter that provides the composite response.

**Question 6:** You can upload any modifications below.

Emery Planning - Housing Land Supply Assessment (As submitted - 20.09.22).pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/614881/PDF/-/Emery%20Planning%20%2D%20Housing%20Land%20Supply%20Assessment%20%5FAs%20submitted%20%2D%2020%2E09%2E22%5F%2Epdf>

Richborough Estates - Pre-Submission Local Plan\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618784/PDF/-/Richborough%20Estates%20%2D%20Pre%2DSubmission%20Local%20Plan%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To confirm that Exceptional Circumstances exist to justify the release of additional Green Belt land for residential development. Further, to continue to highlight that the Council's Assessment of the Site (LS1/020 – Land north of Charlton Road) is incorrect and the site should be released from the Green Belt and allocated for development.

Please see enclosed letter that provides the composite response.

<b>Respondent: Richborough Estates (42188193)</b>
<b>Organisation:</b>

<b>Response ID: 1127880</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST1: Presumption in Favour of Sustainable Development
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not justified, Not effective, Not consistent with national policy - were also selected DUTY TO CO-OPERATE The NPPF (paragraphs 24 to 27) confirms the Duty to Co-operate ('DtC') continues to be a basic procedural requirement of plan making. In particular, paragraph 26 details that this joint working should determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere. The purpose of the DtC is to ensure strategic priorities are properly co-ordinated and clearly reflected in Local Plans. The failure to demonstrate compliance with the DtC would render the Local Plan incapable of being found to be legally compliant. We support, therefore, the principle of the Council working with neighbouring authorities to address strategic issues and emphasise the need to continue this process throughout the Plan-making process. However, it is concerning that the Council is "only in the process of preparing statement of common ground outlining its cooperation with strategic bodies" 1 . We suggest that given the stage (Regulation 19), the Local Plan should be based on already agreed positions on all strategic matters with all

relevant parties. This is particularly important when it comes to the delivery of housing given the constraints of surrounding boroughs and the equal or greater housing pressures upon them. Thus, the Council will need to work proactively with its neighbouring authorities to ensure the needs are met. There are also major infrastructure projects that whilst stalled, for instance, the planned expansion of a third runway for Heathrow Airport, should be taken into account given the importance of the National Significant infrastructure Project ('NSIP'). As set out in previous submissions, the anticipated benefits for the South East from the Heathrow expansion include up to £30bn in economic benefits and the creation of 33,200 new jobs. Given the immediate proximity of the Borough to Heathrow, it is perfectly placed to provide complementary development (both housing and economic) to the NSIP.

In this context, we emphasise in the strongest terms the need for the Council to address, as a minimum, its full Objectively Assessed Housing Need ('OAHN'), whilst also exploring options to go above this. As set out above, this will then ensure the Local Plan accords with the NPPF (paragraph 61). In previous submissions, we also flagged where the examining Inspector for both the Waverley and Guildford Local Plans emphasised the need for these authorities to ensure the full OAHN of the Housing Market Area ('HMA') was met, despite the presence of additional statutory environmental constraints compared to Spelthorne.

Whilst we support the Council in seeking to meet its own development needs (618 dpa), there remains an imperative that all possible options at going above this figure in order to accommodate potential unmet need from neighbouring authorities is also explored, as well as reflecting the substantial economic growth the area is anticipated to experience. In reviewing the DtC Statement of Compliance (May 2022) and with a focus on the strategic matter of housing, it is clear that with the seven neighbouring authorities<sup>2</sup> not being able to assist, the Council must look at further Green Belt release to ensure a sufficient buffer is incorporated.

The first test of soundness is unequivocal that a Plan can only be found to be "positively prepared" where it provides a strategy that as a minimum seeks to meet its own objectively assessed needs, as well as preparing agreements with other authorities to accommodate unmet need. At the moment and in consideration of the above, we do not consider it does.

It is also worth highlighting the comments of the Home Builders Federation ('HBF') and in particular, there is "no mention is as to the scale of unmet needs in other areas [and] the identified shortfall in new homes in London between 2018 and 2028 that was identified during the examination of the London Plan". Not only is there an identified shortfall resulting from London but with Elmbridge having just submitted its Plan which seeks to only deliver approximately 70% (6,785) of its OAHN (9,705), the importance of ensuring the combined shortfall is met is critical to the sound strategic planning of the area as a whole.

Please see enclosed letter that provides the composite response.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

As set out in response to Question 5, we suggest that given the stage (Regulation 19), the Local Plan should be based on already agreed positions on all strategic matters with all relevant parties. This is particularly important when it comes to the delivery of housing given the constraints of surrounding



boroughs and the equal or greater housing pressures upon them. Thus, the Council will need to work proactively with its neighbouring authorities to ensure the needs are met.

There are also major infrastructure projects that whilst stalled, for instance, the planned expansion of a third runway for Heathrow Airport, should be taken into account given the importance of the National Significant infrastructure Project ('NSIP'). As set out in previous submissions, the anticipated benefits for the South East from the Heathrow expansion include up to £30bn in economic benefits and the creation of 33,200 new jobs. Given the immediate proximity of the Borough to Heathrow, it is perfectly placed to provide complementary development (both housing and economic) to the NSIP.

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Please see enclosed letter that provides the composite response.

**Question 6:** You can upload any modifications below.

Richborough Estates - Pre-Submission Local Plan\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618785/PDF/-/Richborough%20Estates%20%2D%20Pre%2DSubmission%20Local%20Plan%5FRedacted%2Epdf>

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<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
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Yes/No/Not answered: Yes, I wish to participate in hearing session(s)
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If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Please see enclosed letter and response to Section 6 above. (Q.5 here)
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<b>Respondent: Richborough Estates (42188193)</b>
<b>Organisation:</b>

<b>Response ID: 1127859</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not justified, Not effective, Not consistent with national policy - were also selected. The Policy states the housing requirement is 618 dpa which over the Plan period (2022-2037), results in a need of 9,270 dwellings. We consider the Council has underestimated the actual level of need/supply owing to discrepancies with the housing requirement. Housing Requirement We consider there is a need for the Council to apply a 20% buffer to the housing requirements. The NPPF at paragraph 74 requires a 20% buffer to be applied in accordance with the Housing Delivery Test ('HDT') "where there has been a significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply" The 2021 HDT results were published on 14 <sup>th</sup> January 2022 by the then Ministry of Housing Communities and Local Government ('MHCLG'). The results identified that Spelthorne delivered just 69% of its housing requirement against the HDT. This has resulted in the Presumption of Sustainable Development being applied, regardless of the 5YHLS position. This is against a backdrop of previous poor HDT results – 50% in 2020 and 60% in 2019. It is unclear why only a 5% buffer is applied and we advocate for the use of a 20% buffer on top of the assessed Local Housing Need ('LHN') figure.

Further, and as set out in the submitted report undertaken by Emery Planning which includes a thorough assessment of the Council's deliverable supply, and in particular, its 5YHLS, we consider this policy is unsound.

Please see enclosed letter and Housing Land Supply Assessment by Emery Planning that provides the composite response.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

Given the extent of housing need in the Borough and past under-delivery, further Green Belt release is required to ensure the Local Plan has identified a sufficient amount of new homes on sites that are truly deliverable and which is based on a positively prepared, justified, effective and sound spatial strategy.

Please see enclosed letter and Housing Land Supply Assessment by Emery Planning that provides the composite response.

**Question 6:** You can upload any modifications below.

Emery Planning - Housing Land Supply Assessment (As submitted - 20.09.22).pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/614838/PDF/-/Emery%20Planning%20%2D%20Housing%20Land%20Supply%20Assessment%20%5FAs%20submitted%20%2D%2020%2E09%2E22%5F%2Epdf>

Richborough Estates - Pre-Submission Local Plan\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618781/PDF/-/Richborough%20Estates%20%2D%20Pre%2DSubmission%20Local%20Plan%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To confirm that Exceptional Circumstances exist to justify the release of additional Green Belt land for residential development. Further, to continue to highlight that the Council's Assessment of the Site (LS1/020 – Land north of

Charlton Road) is incorrect and the site should be released from the Green Belt and allocated for residential development.

Further, whilst the Council states that it is seeking to have its five year housing land supply confirmed through the examination of the Local Plan, it has not provided any clear evidence to support the inclusion of over 2,000 dwellings on sites with outline planning permission for major development or

allocated sites without planning permission at all. Without any clear evidence, these sites fail to meet the definition of deliverable as set out on page 66 of the Framework and cannot be included in the deliverable supply. Therefore, the Council has not demonstrated a deliverable five year housing land supply. Should the Council provide evidence to justify its position, we respectfully request the opportunity to comment on it on behalf of our client.

Please see enclosed letter and Housing Land Supply Assessment by Emery Planning that provides the composite response.

<b>Respondent: Richborough Estates (42188193)</b>
<b>Organisation:</b>

**Response ID: 1127860**

**Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough**

**Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be **legally compliant**?**

Yes/No/Not answered: No	Additional Comments: Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
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**Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be **sound**?**

Yes/No/Not answered: No	Additional Comments: Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
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**Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan **complies with the Duty to co-operate**?**

Yes/No/Not answered: No	Additional Comments: Not Positively Prepared Not Justified Not Effective Not Consistent with National Policy
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**Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.**

Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared

**Question 4: Please give details of why you consider the Local Plan is **not legally compliant** or is **unsound** or **fails to comply with the duty to co-operate**. Please be as precise as possible.**

If you wish to **support** the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:

Richborough Estates supports the decision to bring forward a new Local Plan as the importance of creating a Plan-led approach to planning for development cannot be understated given the Council's adopted Local Plan pre-dates the National Planning Policy Framework ('NPPF'). A new Local Plan is required to ensure the future needs of residents and businesses in the Borough can be met through the sustainable development of sites. However, it is the omission of a number of sustainably located sites for housing which we consider results in the spatial strategy of the Local Plan being unsound. Of particular concern is the assessment of the land west of Charlton Road, Shepperton (the 'Site') within the evidence base that has seen it removed as a preferred residential allocation site.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

**ALTERNATIVE SITES:**

A new Local Plan is required to ensure the future needs of residents and businesses in the Borough can be met through the sustainable development of sites. However, it is the omission of a number of sustainably located sites for housing which we consider results in the spatial strategy of the Local Plan being unsound. Of particular concern is the assessment of the land north of Charlton Road, Shepperton within the evidence base that has seen it removed as a preferred residential allocation site.

**SUGGESTED MODIFICATIONS:**

In summary, we contend our analysis as set out below and contained within the enclosed letter clearly demonstrates Site LS1/020 – Land north of Charlton Road (that was within sub area 25-b) does not perform the purposes for which land is included in the Green Belt and as such, should be released from the Green Belt and allocated for residential development.

**LAND NORTH OF CHARLTON ROAD (LS1/020)**

The Site extends to approximately 3 hectares ('ha') and is situated to the southeast of the Queen Mary Reservoir, with residential properties within Charlton village forming the northern and eastern boundaries with New Road/Charlton Road forming the southern. The Site is greenfield and is currently used as horse pasture/grazing leased on a short-term basis with a right to terminate with 6 months' notice. The Site is therefore considered available for development.

As was detailed in the Connectivity Statement submitted in support of the representations to the Preferred Options consultation (January 2020), local facilities and sustainable travel options are located within the village of Charlton and accessible via existing pedestrian infrastructure to the east of the Site. Shepperton, including its mainline railway station, is also accessible via existing pedestrian infrastructure to the south of the Site, providing attractive sustainable transport modes for future residents. It also raises the potential enhancements that could be delivered as part of any allocation for the Site. These would be to the benefit of both existing and future residents of Charlton Village. This demonstrates that the Site is suitable for development.

In support of previous representations, technical assessments in relation to flood and drainage, highways, and capacity Masterplanning was submitted, and this demonstrated the Site can achieve up to 130 dwellings.

Please see enclosed letter that provides the composite response.

**Question 6:** You can upload any modifications below.

Richborough Estates - Pre-Submission Local Plan\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618782/PDF/->

[/Richborough%20Estates%20%2D%20Pre%2DSubmission%20Local%20Plan%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618782/PDF/-/Richborough%20Estates%20%2D%20Pre%2DSubmission%20Local%20Plan%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Yes, I wish to participate in hearing session(s) To confirm that Exceptional Circumstances exist to justify the release of additional Green Belt land for residential development. Further, to continue to highlight that the Council's Assessment of the Site (LS1/020 – Land north of Charlton Road) is incorrect and the site should be released from the Green Belt and allocated for residential development.

Please see enclosed letter that provides the composite response.



<b>Respondent: Richborough Estates (42188193)</b>	
<b>Organisation:</b>	
<b>Response ID: 1127868</b>	
<b>Policy / Evidence Base / Part of Plan: Policy SP7: Heathrow Airport</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Not justified, Not effective, Not consistent with national policy - were also selected Whilst we support the Policy in principle, given the status of the expansion of Heathrow as a National Significant Infrastructure Project ('NSIP'), it is highly likely that political support and momentum for the expansion will return within the Local Plan period up 2037. We therefore consider the Policy unsound as it is not based on a positively prepared and effective strategy that will deliver what will be required. Please see enclosed letter that provides the composite response.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
It light of the response to Question 5 above, we request additional housing sites that are in sustainable locations are released from the Green Belt – one of which is land to the north of Charlton Road. Please see enclosed letter that provides the composite response	
<b>Question 6: You can upload any modifications below.</b>	

Richborough Estates - Pre-Submission Local Plan\_Redacted.pdf  
<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618786/PDF/-/Richborough%20Estates%20%2D%20Pre%2DSubmission%20Local%20Plan%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To confirm that Exceptional Circumstances exist to justify the release of additional Green Belt land for residential development. Further, to continue to highlight that the Council's Assessment of the Site (LS1/020 – Land north of Charlton Road) is incorrect and the site should be released from the Green Belt and allocated for residential development. Please see enclosed letter that provides the composite response.

<b>Respondent: Richborough Estates (42188193)</b>
<b>Organisation:</b>

<b>Response ID: 1127857</b>
<b>Policy / Evidence Base / Part of Plan: Policy H1: Homes for All</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not justified, Not effective, Not consistent with national policy - were also selected Whilst we support in principle the provisions of Policy H1: Homes for All in relation to housing mix and standards, we advocate for greater flexibility, appreciating the context of a site as well as the wider spatial strategy of the Plan. Policy H1 confirms the housing requirement of 618 dwellings per annum ('dpa') for the period up to 2037. We support the Council in utilising the standard methodology for assessing housing need as stated at footnote 1 of the Plan. The Government has been clear that the 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes. However, in the longer term, the Government has pledged to review the methodology and accordingly we can anticipate a revised methodology to be published prior to the adoption of the Local Plan, and possibly before its submission for EIP. Should this occur, further public consultation on any revised housing requirement should occur to ensure the approach is sound. Currently, we therefore suggest the Policy is unsound.

Please see enclosed letter that provides the composite response.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

Given this uncertainty (as set out in response to Question 5 (4 as above)), we suggest the Council should apply an approach to planning for its development needs by providing a 20% buffer. The 2021 HDT result was published on 14<sup>th</sup> January 2022 and for the Council, they recorded a score of 69% and therefore as a consequence the Presumption in favour of Sustainable Development is triggered, even if there is a 5YHLS. Although the Council is now contending it has a 5YHLS as shown in the Housing Trajectory and Five-Year Housing Supply Document, at an Appeal in only January 20221 the Borough confirmed it had a 4.5 year supply of housing. Due to this persistent under-delivery and lack of recent 5YHLS we contend that a 20% buffer should be applied.  
Please see enclosed letter that provides the composite response.

**Question 6:** You can upload any modifications below.

Richborough Estates - Pre-Submission Local Plan\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618780/PDF/-/Richborough%20Estates%20%2D%20Pre%2DSubmission%20Local%20Plan%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To confirm that Exceptional Circumstances exist to justify the release of additional Green Belt land for residential development. Further, to continue to highlight that the Council's Assessment of the Site (LS1/020 – Land north of Charlton Road) is incorrect and the site should be released from the Green Belt and allocated for residential development.  
Please see enclosed letter that provides the composite response.

<b>Respondent: Mr Will Ridalls (42102049)</b>	
<b>Organisation:</b>	
<b>Response ID: 1119472</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>We submit this following representation to the Spelthorne Emerging Local Plan (ELP) Regulation 19 Consultation on behalf of our client, Wayne Michaels. Having reviewed the ELP Document, we do not believe it can be considered sound in its current form. We propose that, in order to address the requirement of being sound, additional (brownfield) allocations should be made within the ELP. Of these allocations, one suitable site is Manor Farm. Manor Farm has been previously advertised within the ELP process, and within the “discounted alternative site allocation – officer site assessments” (LS1/018, Page 199-207) it is considered to be a large site, comprising of brownfield and greenfield land. The site was originally advertised containing fields adjacent to the site, alongside the brownfield land. The site is currently being presented as brownfield only, with no adjacent fields being included. A red line plan has been enclosed for reference.</p>	

The conclusion for the site was negative, predominantly due to the impact on the green belt. It acknowledges that the NPPF indicates brownfield land should be made use of, however considered that the whole site reduces the openness of the area. The previously developed land only is noted as being "... the preferred scheme should it be taken forward...". Sustainability was also considered to be "limited" for this site.

This conclusion appears to be reached in the context of a larger site including greenfield land, with 150 units suggested, rather than considering the build out of the brownfield land, with a notably lower unit count.

#### Soundness Test

For the plan to be considered sound, it must meet the key tests of soundness, set out in Paragraph 35 of the NPPF, which states that the plan must be:

- a. Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b. Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c. Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d. Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

#### Failure to meet the soundness test

Within the evidence base and ELP, we consider that the strategy pursued is flawed. We do not consider the ELP in its current form sound, falling short of being "positively prepared", "justified" and "consistent with national policy".

We consider the ELP is not "positively prepared", especially with regard to the 5 Year Housing Land Supply (5YHLS) position. An updated "Housing Trajectory and Five Year Housing Land Supply" has been published part way through the regulation 19 consultation (16<sup>th</sup> August 2022), and a 5YHLS of 5.6 years is claimed. This is a notable increase from the 2021 position of 4.5 years (as set out in the 2021 Housing Delivery Test Action Plan, page 32).

We consider that the 5YHLS currently claimed is overly optimistic, and that there is still a lack of deliverable sites. Within the planning policy guidance (PPG), it is identified that an authority may consider whether they can demonstrate a 5 year supply of deliverable sites when determining if a plan should be updated (61- 065-20190723).

Furthermore, paragraph 68(a) of the NPPF requires planning policies to "... identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of: (a) specific, deliverable sites for years 1 to 5 of the plan period ..."

Therefore, whilst a 5YHLS is currently claimed, we consider this cannot be demonstrated. If this cannot be demonstrated, this is a breach of paragraph 68(a) of the NPPF. Furthermore, the ELP cannot be considered positively prepared. In the circumstances, the remedy is to find a wider range of deliverable sites, and we consider that Manor Farm could contribute to this.

A key part of the NPPF “justified” test is taking an appropriate strategy, whilst considering reasonable alternatives. We consider that through the ELP process, there was a lack of reasonable alternative sites considered and allocated.

Furthermore, with specific regard to Manor Farm, we do not believe that “reasonable alternatives” were considered on site when considering the red line extent of a potential allocation. Whilst we do not dispute that the impact of development on the wider greenfield site is unsuitable, we strongly consider that the brownfield site is suitable for the delivery of homes. This reasonable alternative to the allocation appears to not have been given its required thought.

Furthermore, re-use of brownfield sites is a clear priority within National Planning Policy. As part of the soundness test, the proposed development plan must be “Consistent with national policy”. The NPPF provides a range of policy regarding key matters relevant to the wider plan and Manor Farm, the proposed site to be allocated. This includes identifying a deliverable five year supply of dwellings (paragraph 68(a) as mentioned prior), the re-use of brownfield sites and development that may be considered appropriate in the Green Belt. Key policy showing this includes:

- Paragraph 119 which states that “Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land”
- Paragraph 149(g) which informs that construction of new buildings in the Green Belt is appropriate if it comprises of “limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use ... which would not have a greater impact on the openness of the Green Belt than the existing development; or not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority”

#### Manor Farm Merits

The proposed site has been considered previously developed land by an Inspector at appeal in April 2014 (ref. 13/2210225). No significant change has occurred to the proposed site in the intervening time period, and the site boundary is conterminous with the red line proposed. It can therefore be concluded that the site continues to be considered previously developed land.

In the same 2014 appeal, it was also considered that the proposal (comprising of residential units) would not, in principle, be an inappropriate form of development in the Green Belt. The proposed site was granted permission for mixed B1/B8 purposes, along with the assembly of film equipment in 2001. Industrial processes have been carried out before this, with a prior application granted in the 1990’s.

The site is predominantly hard standing, with buildings set on the site and an array of commercial vehicles are also parked on site. These vehicles range in sizes, however many of these vehicles are large and bulky (principally haulage and heavy goods vehicles).

The site is well linked to Charlton, and we consider that suitable development in this location is sustainable. You can therefore allocate this site with confidence that it will assist in producing a sound plan.

In its current form, it is clear the ELP fails to pass the soundness test for multiple reasons. Additional allocations should be made in order to bring the ELP in line with the correct standards. Manor Farm can provide a key opportunity to do this on a suitable brownfield site. We hope that following receipt of this letter, you will consider the current position of the ELP, and take suitable remedial action (including the allocation of Manor Farm).

**Question 6:** You can upload any modifications below.

Representation Form[3871] - Ridalls PCL\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618870/PDF/-/Representation%20Form%5F3871%5F%20%2D%20Ridalls%20PCL%5FRedacted%2Epdf>

09-15-22 Reg 19 Response[3872] - Ridalls PCL\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618871/PDF/->

[/09%2D15%2D22%20Reg%2019%20Response%5F3872%5F%20%2D%20Ridalls%20PCL%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618871/PDF/-/09%2D15%2D22%20Reg%2019%20Response%5F3872%5F%20%2D%20Ridalls%20PCL%5FRedacted%2Epdf)

211103 SK1.0 Existing Siteplan [3873] - Ridalls PCL\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618872/PDF/->

[/211103%20SK1%2E0%20Existing%20Siteplan%20%5F3873%5F%20%2D%20Ridalls%20PCL%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618872/PDF/-/211103%20SK1%2E0%20Existing%20Siteplan%20%5F3873%5F%20%2D%20Ridalls%20PCL%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Michael Riley (41829537)</b>	
<b>Organisation:</b>	
<b>Response ID: 1124249</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Please register my objections to the planned developments proposed for this green belt land. There are not enough large open spaces in this part of sunbury, many parts which are showing neglect already, why not fix those issues instead of these, there are not enough schools or doctors to cater for the extra inhabitants. The pollution level is already very high, traffic is bad, and the noise levels from the motorway and airport are extremely high at times. Why can this area not be extended in to more park area for the benefit of wildlife and current residents. This appalling proposal simply does not fit and should be rejected.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Richard Robinson (33704321)</b>	
<b>Organisation:</b>	
<b>Response ID: 1124635</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>I write to ask the council not to change the current designations of green felt land in the borough, nor to provide planning permission for home building on any green belt land.</p> <p>We have loads of land and property available in the borough that could be utilised or repurposed for home building.</p> <p>With regards to the current proposals for redevelopment of the Debenhams' site and those others by the river and town centre my view is these should be redeveloped to provide REAL AFFORDABLE housing, not the crazy so-called affordable housing currently put up.</p> <p>The council should build and own these properties, they should have 2 or 3 bedrooms, maybe some with 4 bedrooms and provide proper, realistically affordable homes for LOCAL people, not to provide nice rental streams for property landlords or a few wealthy individuals from elsewhere. They should be big enough for a family; not built so that a family has to be squeezed into one or two bedrooms.</p>	

By building proper housing close to the centre avoids the need for long commutes for many and will help to keep the town centre alive and well. The council must, at the same time, provide additional school and medical facilities to cater for the increased population as existing facilities are already overloaded.

A couple of small parks and/or playgrounds should also be included in the new developments, which should be for the use of all, not just the few rich who have the prestige entrances.

Fancy built in gyms are not needed as a nice new leisure centre is already being built.

The council needs to put the interests of its current residents and families first and foremost in any developments considered.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Rod Robinson (41621729)</b>	
<b>Organisation:</b>	
<b>Response ID: 1113185</b>	
<b>Policy / Evidence Base / Part of Plan: CIL and Viability Assessment</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: yes, i have no basis to consider it is not.	Additional Comments: Yes
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: yes, on balance. I do not fully agree with the pressure that is being put on the rest of the borough by focusing on Staines on Thames, as it must surely still be able to absorb the most high density developments. However, the plan in the whole- particula	Additional Comments: yes, on balance. I do not fully agree with the pressure that is being put on the rest of the borough by focusing on Staines on Thames, as it must surely still be able to absorb the most high density developments. However, the plan in the whole- particul
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: yes i consider the plan has	Additional Comments: yes i consider the plan has
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	

In general i would have liked to see the plan take a more ambitious and enlightened view on sustainability, climate resilience and adaptation and enhancing the quality of life of Spelthorne's residents. However, i applaud it as a first step and anything which will provide the means to stop the more inappropriate and money grabbing developments.

I consider the proposed Local Plan to be based on up to date evidence, as available to the Council at the time of development. As noted in various of the later supporting documents such as the Local Plan and potential Community Infrastructure Levy (CIL) review Viability Assessment (2020 - 22) Final Report July 2022 DSP19592 there are many wider factors that (cost of living crisis, Govt leadership term, external factors such as the war in Ukraine that are likely to dramatically change a number of factors.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Rod Robinson (41621729)</b>
<b>Organisation:</b>

<b>Response ID: 1124228</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
I strongly support the plan in its goal to maintain the green belt and to fight attempts to build on Green Belt land such as the proposed development on the land adjoining Groveley Road/The Running Horse/Vicarage Road in Sunbury.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
No Response
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Rod Robinson (41621729)</b>
<b>Organisation:</b>

<b>Response ID: 1113188</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
I strongly support the local plan in placing the need to address the climate emergency, to ensure net zero housing, low carbon infrastructure as a key element in future planning for Spelthorne. I look forward to more ambitious plans in the future
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
No Response
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Roy Robinson (41500097)</b>
<b>Organisation:</b>

<b>Response ID: 1124081</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Local Plan Green Belt/Sunbury Common/Groveley Road I would like to protest against the local planning application on the green belt by the Running Horse public house in Sunbury. The Spelthorne planning department have over the years made some monumentally incorrect decisions and if we lose this last bit of green space between Feltham and Sunbury it will be the worst decision it has made. I understand that Spelthorne has reached it's government quota so why should we give up any more of our green belt when there are so many brownfield sites that would improve the area they are in. The infrastructure that Spelthorne is putting everyone under by having to many houses built should be remedied first. The doctors cannot cope it is almost impossible at this moment to get a doctor's quick appointment also trying to get an NHS dentist is a major problem.

The roads cannot cope and with BP offices any more traffic in the area around the running horse area will grind the area to a standstill. Therefore please listen to the people who have to live in the areas where you are making decisions about and decline this Local Plan and planning application

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Christine Rogers (41389825)</b>
<b>Organisation:</b>

<b>Response ID: 1111789</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Local Green Space: Sunbury Common: Catherine Drive I have been a resident of Catherine Drive for 25 years and in all that time the green has been regularly used by residents and non-residents and is an important amenity for the road. I personally have used the green to run round for exercise and I have seen other people use it for exercise. I particularly like to exercise later in the evenings, when it is quiet and very few cars or people are around, as I feel it is safer than running around the the other roads late at night. The green has been used to provide space for entertainment for children’s birthday party, e.g. a football coach came to teach the children football skills. It is, in fact, regularly used by the children who live in the road, plus non-street children, to play football and other games. Dog walkers regularly use the green to exercise their dogs.

The green provides a space for residents to meet for social get togethers, which encourages neighbourliness.  
Having a open vista when looking out from the house also adds to people's mental well being.  
These are the reasons why I think this land should remain an open space for people to enjoy.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Philip Rosling (42012097)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117533</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>This email is in regards to the green space in Stroud Way / Landon Way in Ashford TW15, and to the proposal of selling this piece of land off.</p> <p>When we first looked into Landon Way in November 2011, there was a small gathering on the green to celebrate Guy Fawkes Night. Having grown up in Hetherington Road in Charlton Village, I immediately saw the appeal of our children growing up with the same sense of a green space and a feeling of community, and we made an offer on 16 Landon Way. We have been here ever since, and use the green regularly for street parties, Guy Fawkes, Queen's 60<sup>th</sup> and 70<sup>th</sup> jubilee anniversaries along with playing football and sports with other residents children. We even had a trampoline one summer which was used by literally everyone !</p> <p>There are squirrels that live in the tree on the green and its fascinating to see so many pigeons shifting out the worms on a misty morning. The wildlife use the green as much as we do when its rained.</p>	

The green here is a much used, priceless piece of land that is shared by everyone in Stroud Way, Landon Way and Courtfield Road. We would never have brought here without it as it makes the area appealing for families with young children. The local parks are close by, but without a car it is a good 15 minute walk. The children here can literally step out of their houses and play. The community spirit is strong and we look out for each other. If a parent is watching the kids play, it gives at least one parent a chance to relax, a brilliant stimulant for mental health improvement. I would strongly oppose any movement to make use of this green space except for what it is currently being used for. Which is purely community enjoyment. There is no price on that.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mrs Meghan Rossiter (38928609)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122411</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Draft Policy PS1: Responding to the Climate Emergency The wording of point 1a) of this policy suggests that proposals that would not meet the ideals of Twenty Minute Neighbourhoods may be refused planning permission. As this is a concept not yet adopted within national policy or guidance it would be more effective to include reference to TWN within a footnote, alongside text advocating the use of this or other national guidance.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Meghan Rossiter (38928609)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122407</b>	
<b>Policy / Evidence Base / Part of Plan: Policy H2: Affordable Housing</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Draft Policy H2: Affordable Housing The wording of point 2a) of draft policy H2 places a rigid expectation that housing will meet the needs identified in the SHMA. While this provides a useful borough-wide assessment of need other sources can be used to better understand needs more local to a development proposal and which this policy could allow for. While footnote 29 acknowledges that other Council-produced documents should be used in the future, this does not provide the flexibility sought by paragraph 82(d) and long-term effectiveness in plan-making as sought by paragraph 35©. Point 2d) of the policy partially replicates point 2a) and could be trimmed to avoid unnecessary duplication, and focus instead on the plan-wide tenure split expectations.	

The monitoring indicators set out on page 73 may also include monitoring against the Housing Register. The benefit of this second source of monitoring would be to provide a focused assessment of how well the Local Plan is performing against up-to-date needs, providing officers with the ability to feed more specific data into local plan review and individual planning applications.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Meghan Rossiter (38928609)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122408</b>	
<b>Policy / Evidence Base / Part of Plan: Policy E2: Biodiversity</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Draft Policy E2: Biodiversity The flexibility within this policy in relation to the delivery of net gain within a hierarchy is supported. To further assist in the delivery of net gains across the borough the Council may wish to explicitly encourage joint working with local wildlife organisations or the use of habitat banks. This has the potential to deliver greater environmental benefits, more quickly, across the borough than can be achieved through individual development proposals, as well as encouraging greater community involvement in planning.	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Meghan Rossiter (38928609)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122409</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ID2: Sustainable Transport for New Developments	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
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<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Draft Policy ID2: Sustainable Transport for New Developments	
The thresholds for determining the use of transport statements, assessments and travel plans is well set out in national guidance, including the PPG, which emphasises that only developments which generate significant amounts of transport movement should be required to provide a travel plan. Similarly, the difference between requiring a transport statement or assessment is dependent on the form and scale of the development, and the site specific circumstances. This policy should reflect this in applying more flexible wording to ensure applicants produce proportionate evidence to support development proposals, instead stating:	
1. (f) providing a transport assessment and travel plan for all major development proposals likely to generate significant amounts of transport movement	
...	

This can reduce financial outlay for applicants and reduce the scope of work officers and the local community are expected to read to understand applications. It may assist applicants if the Council were to produce template travel plan guidance for different scales of development within a new transport SPD.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Nigel Rowe (33516193)</b>
<b>Organisation: Riverside Residents (Staines) Coalition</b>

<b>Response ID: 1120861</b>
<b>Policy / Evidence Base / Part of Plan: Evidence base</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
<p>Infrastructure provision and delivery</p> <p>In almost every aspect the Infrastructure Delivery Plan is merely aspirational and indicative, a summary of the obvious issues that need to be addressed, problems that need to be solved, and some ideas for how and where solutions might be sought and hopefully found. In places it is more like thinking-aloud musings. It is definitely not a 'plan'. It is clear that much of the town's infrastructure is already at or near capacity. There are many references to how new capacity will be assessed as each new individual development is proposed. But no-where is there any indication that infrastructure providers have modelled the impact of adding 5,440 new homes to Staines, increasing its population by about 10,000, roughly 50 per cent of what it is today. This is particularly the case in relation to utilities (eg water, electricity) where the demand for costly new physical infrastructure is an issue as well as supply. It also applies in areas such as road infrastructure, flood risk and climate change. Until at least some basic modelling work on this is done it is impossible to</p>

know whether the number of new homes for Staines demanded by the Local Plan is deliverable let alone sustainable ... and it is therefore impossible to assert that the Local Plan is 'sound'. Little wonder that in the residents' survey (Appendix 6, page 48) overwhelming concern was expressed about ten areas of infrastructure provision. 3.1.7 Looking at the issue of infrastructure provision and funding in the round, the Council's plans do not satisfy the obligation to provide a comprehensive assessment of what infrastructure would be required to deliver the Local Plan (paragraph 34, NPPF, July 2021). As we understand it, this is needed to ensure a proper cost assessment can be made to determine the infrastructure 'gap' overall and the contribution required from developers among other sources. For example, in 2017, Surrey County Council's Surrey Infrastructure Study estimated the gap for the whole of Spelthorne to 2031 to be nearly £49,250,000 based on 3,916 new homes and infrastructure costs of £123,530,000. To put this in perspective, Staines alone is now expected to ensure 5,440 new homes are built by 2037 – what is the projected infrastructure cost and what is the funding gap? Road infrastructure and related issues 3.1.8 The road infrastructure of Staines must be judged to be at or near capacity already with several choke points that the Infrastructure Delivery Plan does not address – no doubt because there is no practical/affordable way to resolve them. Access to the town from any direction is single-lane and there is no practical remedy for this because of the physical constraints of railway bridges and the road bridge across the Thames. And even if there was a practical solution for these pinch-points there is no scope to widen roads within the town. Indeed, if some of the drawings in the supporting 'Staines Development Framework' document are reliable, some existing roads will be narrowed. 8

A major problem is the Council's assessment that some two-thirds of traffic in Staines is merely passing through, largely because of the bridge across the Thames (a Listed structure). There are no proposals for how this problem can be solved or funded, merely that through traffic will be 'discouraged' in some unspecified way. Plans for Staines Bridge Capacity Improvements seem to have been kicked into the long grass ... and even if pedestrian ways on both sides of the bridge are removed to enable two-lane traffic in both directions, it would feed into the town's essentially single-lane road system.

Several public car parks in Staines are earmarked for redevelopment into tower blocks of flats. Those approved or under consideration offer very few parking spaces for residents. The Transport Strategy Diagram actually indicates a potential loss of 1,910 vehicle spaces from public car parks being considered for redevelopment, with the possibility of a single new multi-storey car park at the edge of the town centre. Despite a planned 50 per cent increase in the town's population (with very few parking spaces in the new tower-block developments) and a declared aspiration to make Staines a place people will want to visit, the Council has a declared determination not to increase the number of public parking spaces in the town beyond what it is today. The concept of redressing this with significantly improved public transport is essentially aspirational and indicative, not a 'plan', and as yet unsupported by commitments from providers, certainly to the level that will be required.

#### Utilities

Provision of the physical infrastructure as well as supply to meet the need especially for water and electricity is a massive problem for Staines, the size of the problem barely recognised in the Infrastructure Delivery Plan. This issue is exacerbated by the planned population growth elsewhere in and beyond Spelthorne and Surrey.

Take electricity. New homes in particular, and increasingly vehicles, will only use electricity rather than fossil fuels, and to this must be added demand from new commercial activity. None of this is quantified or estimated in the Infrastructure Delivery Plan, let alone identifying how the demand would be met.

Water supply represents an even greater problem in many ways, not least because the source of supply is far more difficult to acquire, and significant new physical infrastructure would be needed. All of the new homes planned for Staines (5,440) and a further 1,800 in part of the rest of the borough (a total of circa 7,200) are in the catchment area of Affinity Water. We understand the company's current capacity could provide fewer than 3,000 new homes with clear water. Affinity have said they do not know how many new homes they could supply over the next 15 years and there may not be enough water to meet future needs.

Thames Water is responsible for drains and sewerage and its current capacity has frequently proved to be insufficient. The company has been forced to discharge into the Thames and Ash several times in recent years. To meet the demands of the planned increase in population and new homes, additional infrastructure will be needed as well as a significant upgrade of the Mogden Sewerage Treatment Works. We understand Thames Water has no current plans to deal with the increasing demands of new development beyond 2026.

**Question 6:** You can upload any modifications below.

RR(S)C LOCAL PLAN RESPONSE full 20 09 22\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618946/PDF/->

[/RR%5FS%5FC%20LOCAL%20PLAN%20RESPONSE%20full%2020%2009%2022%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618946/PDF/-/RR%5FS%5FC%20LOCAL%20PLAN%20RESPONSE%20full%2020%2009%2022%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Nigel Rowe (33516193)</b>
<b>Organisation: Riverside Residents (Staines) Coalition</b>

<b>Response ID: 1120862</b>
<b>Policy / Evidence Base / Part of Plan: Evidence base</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
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Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
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No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Climate Emergency and Managing Flood Risk The Local Plan recognises that the Council has declared a ‘climate emergency’ and affirms that all development must respect and respond to it explicitly. However, the measures proposed in the Local Plan are an inadequate response to this and are 9 more akin to rearranging deck chairs. Tackling the many aspects of climate change must surely be regarded as a major ‘strategic policy’, not treated as it is currently - downgraded to feature as part of the Plan’s ‘Place Making’ strategy (notwithstanding the fact that this was seemingly an upgrade from where it was on 19 May as a ‘design’ policy (DS2) which is still widely referenced throughout the evidence documents and Local Plan itself). A characteristic of this downgrading of its priority is that much of the ‘evidence’ for it was clearly collected retrospectively and published late. The full Council signed off the Local Plan for consultation on 19 May, the same day the updated Level 1 SFRA with its 18 annexes were published. Few if any

Councillors will have read it. Furthermore, the first version of the Level 2 SFRA did not surface until the end of July, five weeks into the public consultation. It is perhaps also worth noting that the Flood Zone on the policy maps (first published as a single page in June and then in interactive form in July) appear to have Flood Zones 2 and 3b the wrong way round.

Climate change is an increasingly dynamic policy area. Yet the Plan has to last notionally for 15 years, so climate change policy enshrined in the Plan is at risk of being rapidly overtaken by events which will make at least some of it redundant. It is widely accepted that there is a problem with the planning guidance failing to keep up with the increasing Government recognition of the threats posed by climate change. It is therefore critical that policy in this area should be as up-to-date as possible, with the Council taking a proactive approach and stretching requirements where feasible in anticipation of further legislation coming down the tracks.

A much clearer statement that 'repurposing' buildings should take precedence over 'demolition and rebuild' should be enshrined in the Plan. The good intentions on this issue outlined in the Plan are vague aspirations rather than commitments. Indeed, the Plan's apparent acceptance that the iconic and Locally Listed four-storey Debenhams building in the Staines Conservation Area should be demolished and replaced by a tower block of tiny flats challenges the notion that it is even a genuine aspiration.

The Plan does not include the measures needed to ensure new developments are aligned with progress towards becoming carbon neutral. As things stand, the Plan will result in a significant increase in carbon emissions as a result of the huge amounts of concrete and steel implicit in the proposed new tower-block developments.

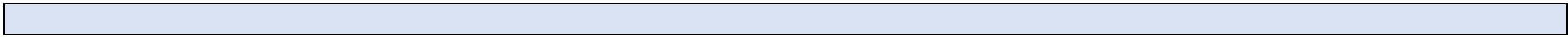
Issues relating to the climate emergency more generally are dealt with in some detail in Appendix 2, page 20. This is currently a key policy area in which the Local Plan is extremely weak in our view, contributing to making it unsound. Appendix 2 contains a number of recommendations for changes and clarifications needed.

Given the threat posed by climate change, flood risk is certain to become one of the most critical issues facing Spelthorne in the coming years. As the Local Plan makes clear, much of Spelthorne is at considerable risk of flooding, Staines in particular in terms of population affected. Staines is the town at the greatest risk in the borough for fluvial flooding (as stated in Level 1 SFRA). No account appears to have been taken of this in the decision to dump 5,440 new homes (55% of the borough's entire housing 'target') on the town. Managing flood risk is one of the key policy areas that best demonstrate the ways in which the Local Plan is not sound. It is not legally compliant (in relation to process), not justified, effective, or consistent with national policy. It is one of the weakest, yet one of the most critical, policy 10 areas covered in the Local Plan. This is set out in graphic detail in Appendix 3, page 26, which recommends many areas where changes or clarifications are needed to make the Plan sound.

**Question 6:** You can upload any modifications below.

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<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618947/PDF/-/RR%5FS%5FC%20LOCAL%20PLAN%20RESPONSE%20full%2020%2009%2022%5FRedacted%2Epdf>



<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: Yes
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Nigel Rowe (33516193)</b>
<b>Organisation: Riverside Residents (Staines) Coalition</b>

<b>Response ID: 1120863</b>
<b>Policy / Evidence Base / Part of Plan: Evidence base</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
<p>ARCHITECTURE AND DESIGN STANDARDS</p> <p>At a meeting of Spelthorne Borough Council in the Spring of 2022, the Council’s current Leader proposed the creation of a design working group (including expert representation from/for the community). It would have very early engagement with the planning process while key issues are being considered. It was an idea that received generous cross-party support at the Council meeting, reflecting a broad recognition that current arrangements and processes are failing the community. This proposal has yet to be actioned. We commissioned and submitted proposed ‘Design Guides and Codes’ (Appendix 5, page 40) for the Council’s consideration in April 2022 (as yet with not even an acknowledgement, let alone comment, from the Council). There are copious references in the Local Plan to the need for high standards of architecture and design, and in the Staines Development Framework to the need for “securing high quality design ... creating beautiful and distinctive places with a consistent and high-quality standard of design”, alongside a</p>

claim that these documents “provide clear guidance on what is expected from new development”. There is virtually nothing to justify this statement in relation to the all-important issue of building design, detail and materials – particularly bearing in mind that 15/16 storey tower blocks will dominate and overwhelm the town’s skyline and townscape. Accessibility doesn’t appear to have been given due consideration either. The study we commissioned on ‘Design Guides and Design Codes for Staines’, submitted in April 2022, remains very relevant to the Local Plan (per Appendix 5, page 40).

**Question 6:** You can upload any modifications below.

RR(S)C LOCAL PLAN RESPONSE full 20 09 22\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618948/PDF/->

[/RR%5FS%5FC%20LOCAL%20PLAN%20RESPONSE%20full%2020%2009%2022%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618948/PDF/-/RR%5FS%5FC%20LOCAL%20PLAN%20RESPONSE%20full%2020%2009%2022%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Nigel Rowe (33516193)</b>
<b>Organisation: Riverside Residents (Staines) Coalition</b>

<b>Response ID: 1120874</b>
<b>Policy / Evidence Base / Part of Plan: Evidence base</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Foreword THE FUTURE OF STAINES-UPON-THAMES Design Guides and Design Codes ... a unique and time-limited opportunity ... see also uploaded PDF for further detail Residents Association partners in the Riverside Residents (Staines) Coalition remain very opposed to the planned overdevelopment of Staines-Upon-Thames, peppering the town with tower blocks of tiny flats to accommodate a near 50% population increase. This has opened the door to 'high-rise heaven' for increasingly aggressive and litigious developers. But the extent to which it also creates a 'high-rise hell' for those who live and work here is as yet unresolved. Right now, at the very beginning of this process, the Council has a unique and time-limited opportunity to mitigate the worst excesses of high-rise hell for the local community by setting the highest standards for the architecture, streetscape and skyline of tomorrow's Staines. We hope to see this reflected in the Staines Development Framework, and not least at sites where the Council is the developer. The Council will also need to be more

robust and demanding in its dealings with third-party developers whose principal interest is their bottom line and shareholders not our town and the wellbeing of its community. Above all, there needs to be a defined overarching concept for the town that is shared with and by residents ... one that is vigorously pursued, not a process that simply accommodates individual developer proposals as isolated and disconnected projects. These are all choices the Council can make if it elects to be bold and imaginative. We wish to play a constructive role and hope the following three factors provide a foundation for this:

- The Council's public recognition that design codes and guidelines will be needed to supplement existing planning policies as part of the Staines Development Framework ,along with the commitment to zoning arrangements to protect sensitive locations(riverfront, Conservation Area, proximity to existing residential areas).
- The significant cross-party support from Councillors at the February Corporate Policy and Resources Committee meeting for the establishment of a Design Working Group to facilitate the involvement and influence of the community and Councillors in the planning process at an early pre-decision stage.
- The opportunity this presents for the Council to meet its constitutional obligation "to work in partnership with residents to make Spelthorne a place where people are fully engaged, and to encourage the active involvement of the community in the decisions that affectthem".

This paper has been developed for and with the Riverside Residents (Staines) Coalition as a contribution to how Staines meets the challenge of its transition to becoming a very different kind of town in which to live and work. The Council must be held to account for the choices it makes ... and the choices it makes in relation to design guides and codes are now also both urgent and overdue.

Riverside Residents (Staines) Coalition – a working group of residents' organisations serving the interests of several hundred residents on both sides of the river.

Nominated contact: Nigel Rowe 07785 776696 [anrowe1@aol.com](mailto:anrowe1@aol.com)

•Staines Village Residents and Traders Association•Thames Edge Management Ltd•Colnebridge Close Residents Association•Richmond Road Residents Association•Friends of The Hythe•Waterside Place (Staines) Residents Management Ltd  
Supported by other residents' organisations across Staines.

**Question 6:** You can upload any modifications below.

Riverside Staines Coalition - Appendix 5\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618949/PDF/-/Riverside%20Staines%20Coalition%20%2D%20Appendix%205%5FRedacted%2Epdf>

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<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618950/PDF/-/RR%5FS%5FC%20LOCAL%20PLAN%20RESPONSE%20full%2020%2009%2022%5FRedacted%2Epdf>

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<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Nigel Rowe (33516193)</b>
<b>Organisation: Riverside Residents (Staines) Coalition</b>

**Response ID: 1126894**

**Policy / Evidence Base / Part of Plan: Evidence base**

**Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be **legally compliant**?**

Yes/No/Not answered: No	<p>Additional Comments: No</p> <p>LEGAL COMPLIANCE</p> <p>We don't believe the local planning authority (LPA) has followed due process.</p> <p>LEGAL COMPLIANCE</p> <p>We don't believe the local planning authority (LPA) has followed due process.</p> <p>Notes on process:</p> <ul style="list-style-type: none"> <li>•The updated Level 1 SFRA with 18 annexes w</li> </ul>
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**Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be **sound**?**

<p>Yes/No/Not answered: No</p> <p>is unsound for the following reasons:</p> <p>not justified</p> <p>not effective</p> <p>not consistent with national policy</p> <p>SOUNDNESS</p> <p>No-one disputes that Spelthorne Borough and perhaps Staines in particular (in terms of population affected) is already at considerable ris</p>	<p>Additional Comments: No is unsound for the following reasons:,not justified,not effective,not consistent with national policy SOUNDNESS,No-one disputes that Spelthorne Borough and perhaps Staines in particular (in terms of population affected) is already at considerable</p>
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**Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan **complies with the Duty to co-operate**?**

Yes/No/Not answered: No Response	Additional Comments: No Response
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**Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.**

Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response

**Question 4: Please give details of why you consider the Local Plan is **not legally compliant** or is **unsound** or **fails to comply with the duty to co-operate**. Please be as precise as possible.**

If you wish to **support** the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:

No Response

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

SFRA

1.Cumulative impacts & approach to flood risk management

The cumulative impacts on flood risk management of building 9,000 new homes have not been considered.

The local authority (LA) failed to take full account of the levels of flood risk when setting the housing number and adopted the Objectively Assessed Need (OAN) as calculated by central government as the target. Having agreed a number in excess of 9,000 units they then made the decision to allocate the majority of new homes to Staines\*, despite it being the town in the borough at the greatest risk from fluvial flooding (as stated in the Level 1 SFRA, Section 3.2, p.11).

\*Of the total of 9,000, we have been told that approx. 55% of all new residential development will be in Staines and we can see that 15 site allocations in Staines town centre account for approx. 3,500 units alone.

Added to the risk of flooding from rivers is the risk of flooding from surface water and groundwater which historically have also been found to be a problem, and in 2014 we had all three happen at the same time (see the Level 1 SFRA, Sections 3.3 to 3.5).

What the guidance says

In their approach to flood risk, Section 1.2 of the Level 1 SFRA says that LPAs should take an active role to assess, avoid & manage/mitigate the risk.

These are explored in Chapters 3, 4 and 5 of the Level 1 SFRA respectively.

Section 1.2 states in assessing flood risk:

“The NPPF outlines that Local Plans should be supported by a SFRA and LPAs should use the findings to inform strategic land use planning.”

In avoiding flood risk, it goes on to say:

“In plan-making this involves applying the Sequential Test, and where necessary the Exception Test to Local Plans”

In managing and mitigating flood risk, it says:

“Where alternative sites in areas at lower risk of flooding are not available, it may be necessary to locate development in areas at risk of flooding. In these cases, Spelthorne BC and developers must ensure that development is appropriately flood resilient and resistant, safe for its users for the lifetime of the development and will not increase flood risk overall. Spelthorne BC and developers should seek flood risk management opportunities (e.g. safeguarding land), and to reduce the causes and impacts of flooding (e.g. through the use of sustainable drainage systems).”

Furthermore, Section 1.3 of the Level 1 SFRA says that one of the quoted purposes of the SFRA is to “Inform the preparation of flood risk policy and guidance”. Another is to “Determine the acceptability of flood risk in relation to emergency planning capability”.

Our view

Assessing flood risk - We have reviewed the evidence available and can find no strategic assessment of the cumulative impacts.

The LPA has adopted the government housing target and the high (and increasing) levels of flood risk in Spelthorne acknowledged in the Level 1 SFRA (Exec Summary and Sections 3.2-3.5), have clearly NOT informed their overall view of strategic land use planning (which is, they say, that they have no choice but to accept the government housing targets “which eclipse everything else in the Plan-making process” according to the Foreword to the Local Plan).

Avoiding flood risk - We have found no evidence of how the Sequential Test has been applied to the Local Plan strategically.

The LPA has not documented in a transparent way how the Sequential Test has been applied to the Local Plan as a whole (as stipulated in Section 4.2, Level 1 SFRA, and described in Section 1.2.3, Level 2 SFRA). It appears to fall in the gap between the two.

Managing/mitigating flood risk - We have found no evidence of how the flood risk of an additional 9,000 homes should be managed strategically or that consideration has been given to the resources required to do so safely.

The LPA has not shown a strategic approach to managing and mitigating flood risk in the borough.

Policy E3 ‘Managing Flood Risk’ takes no account of the overall impact of introducing 9,000 new homes into a borough. The only reference to evacuation plans in Policy E3 (also referenced in the Level 1 SFRA) refers to the government’s personal flood plan guidance. This is hardly appropriate. There is no reference to guidance for developers, there is no reference to a study of emergency planning capability.

The Level 1 SFRA refers to Emergency Planning in several places, notably Sections 1.5 and 5.11 & 5.12 (‘Flood Warning and Evacuation Plans’ and ‘Flood Warning Areas’). However, the Multi-Agency Flood Plan mentioned on p.5 is not available to view and the link to Spelthorne’s old emergency plan is broken (p.6), There is nothing concrete to indicate that emergency planning staff have been consulted and confirmed plans are suitable (and there is no Section 7, mentioned in the User Guide in Section 1.5, with recommendations for policy and practice).

For these reasons we believe that Policy E3 is not justified by the evidence and is inconsistent with national guidance.

2.Safeguarding land

Whilst the River Thames Scheme (RTS) might provide some relief from fluvial flooding to some areas, it is debatable how much relief it will bring to Staines where over 50% of the housing target is planned to be built (including approx.3,500 new homes from just 15 site allocations in the town centre).

This is especially the case given the presence of other watercourses susceptible to flooding and the additional forms of flooding (surface and groundwater) which have all caused significant problems in the past and where the risks are set to increase.

There is no indication in Policy E3, on a strategic level, as to where land should be safeguarded from development that is required, or likely to be required, for current or future flood management, as required by the NPPF, Paragraph 161 b).

In part 10, Policy E3 states that it “supports proposals for strategic flood relief measures” such as the River Thames Scheme but there is no obvious strategic view in the policy or the evidence as to what land in Spelthorne SHOULD be safeguarded overall and where that should be over and above that provided by the RTS.

### 3. Functional Floodplain exemptions

The policy is unclear as to the land status of Local Plan site allocations within Flood Zone 3b. The situation in the case of land already proposed under the Local Plan for potential redevelopment (as opposed to refurbishment) is questionable. Are those sites still classified as Flood Zone 3b until proven otherwise or has some land already been excluded from Flood Zone 3b on the policies map (and the SFRA map)? Definition of FZ 3b in the Level 1 SFRA also inconsistent with PPG, para 078.

### Issues with the Level 2 SFRA

Incomplete scope of assessment (Level 2 SFRA, Section 1.4, p.3)

#### 4. The Level 2 SFRA site screening

Section 1.4 of the Level 2 SFRA appears to have referenced a list of allocations provided in November 2020. It is not clear if this has been updated for allocations added and removed since. For example, Communications House and Two Rivers in Staines town centre do not feature in the list of sites for assessment in Section 3.1 whilst neighbouring sites do.

#### 5. Rationale for not screening in other sites in Flood Zone 2 nor any sites in Flood Zone 1

The Level 2 SFRA has not screened in all sites in Flood Zone 2 nor any sites in Flood Zone 1.

Footnote 55 of Paragraph 167 in the NPPF, states that “A site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3.” In addition, it states that a site-specific FRA might be required for certain sites in Flood Zone 1, due to size, being at risk of increased flooding in future or being at risk from other sources of flooding where development would introduce a more vulnerable use.

There may be sites in Flood Zone 1, particularly in Staines, which should be subject to a site-specific strategic flood assessment on this basis as there is known to be an increase in flood risk in future and there is land which is subject to other sources of flooding.

However, it is not clear from Paragraph 166 of the NPPF whether a site-specific FRA will still be required at the application stage for those sites in Flood Zones 1 and 2 which are confirmed as allocations in the Local Plan.

Paragraph 166 states “Where planning applications come forward on sites allocated in the development plan through the sequential test, applicants need not apply the sequential test again.”

If this were the case, this would appear to make the Level 2 SFRA inconsistent with national policy as there would be Local Plan site allocations which have NOT undergone the sequential and exception tests which should have.

Datasets (Level 2 SFRA, Section 2, p.5)

#### 6. Baseline modelling

It is unclear if the baseline data set used in the Level 2 SFRA is as up-to-date as it should be as flood zone outlines don't look much, if at all different, to the current policy constraints map (from 2009) and surely these would have changed. How up-to-date is "the present day" before the climate change allowances are applied?

NB It is hard to ascertain what has changed in the baseline as a lay person especially as the Pre-Submission interactive policies map appears to have got the legend wrong and has mixed up the flood zoning classifications. 30

Furthermore, it is determined in sections 2.2.15 to 2.2.19 of the Level 2 SFRA that the modelling available for the River Colne was out-of-date (2012!) and incomplete (hazard data not available). It was "therefore proposed to use the 1 in 1000 year outline as a proxy for the climate change outline within the Level 2 SFRA". This is a vital piece of information for the Staines Development Framework, upon which so much depends.

#### 7.Consistency between the Level 2 SFRA and Local Plan

There are clear inconsistencies between the Level 2 SFRA and Local Plan. For example, Fairways Day Centre is a site allocation for approximately 30 new homes and yet the Level 2 SFRA says: "Site ST1/030 (Fairways Day Centre, Knowle Green, TW18 1AJ) is brownfield land located within the 1 in 20 year (5%AEP) flood outline; in line with Policy E2[sic], it is unlikely that development of this site to include residential, which will increase the vulnerability and the number of occupants on the site, will be considered acceptable".

NB Some site allocations are also inconsistent between the two documents (e.g. the site boundaries for ST4/009 The Elmsleigh Centre and ST1/037 Thameside House).

#### 8.Consistency within the Level 2 SFRA

Section 3.3.3 of the Level 2 SFRA Summary states that there are several sites with limited access/egress. Reading between the lines (see Table 3-2 'Summary of flood risk issues and constraints' in the Level 2 SFRA and also Appendix B relating to it), there are many more issues to be considered for a number of sites regarding building footprints, floodplain storage, and application of the sequential test within the site.

Many of the factors the detail describes will place additional constraints on particular sites which raises questions about the number of residential units supported and the viability of particular sites.

**Question 6:** You can upload any modifications below.

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<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618952/PDF/-/RR%5FS%5FC%20LOCAL%20PLAN%20RESPONSE%20full%2020%2009%2022%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?



Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Nigel Rowe (33516193)</b>
<b>Organisation: Riverside Residents (Staines) Coalition</b>

<b>Response ID: 1120866</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST1: Presumption in Favour of Sustainable Development</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not consistent with national policy
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
<p><b>NOT CONSISTENT WITH NATIONAL POLICY</b></p> <p>The Local Plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework. The Foreword of the Local Plan (2 pages as signed by Cllrs Boughtflower / Beardsmore / Harvey) is damning and demonstrates that the Local Plan is not based on the principles of sustainable development. Quotes as follows:</p> <p>“Forget the semantics that it is a ‘housing need’ figure; it is for all practical purposes a rigid target. Every statement by an MP that it is not mandatory looks increasingly vacuous as authority after authority has seen their plan fail at the housing number hurdle.”</p> <p>“No Spelthorne councillor wants to build on our Green Belt, nor do we want to populate our town centres with sterile, high-rise blocks. But that is what Westminster is demanding.”</p> <p>“618 homes per year, compared to the target of 166 in our Core Strategy from 2009, represents an increase that will damage our environment and ruin the character of our small and highly constrained borough.”</p>

Furthermore, in Footnote 10 to Table 1 on p.20 of the Pre-Submission version of the Local Plan, the Council define housing need as an “unconstrained assessment of the number of homes needed”. Ministers have repeatedly said that the OAN is a starting point. 15  
In addition, national policy does NOT require meeting the government’s calculation of objectively assessed need where it is impractical and inconsistent with achieving sustainable development. Local Plan Policy ST1 leaves out where it might be inconsistent with achieving sustainable development which is discussed in paragraph 11, NPPF (July 2021).

Given the extent of Green Belt in the Borough, the strategic value of which is largely undisputed, that in itself provides a very strong reason for restricting the overall scale of development in the plan area. This is especially the case as in Spelthorne there are no areas classified as anything other than Green Belt (65%) or Urban (35%). Even when considering the absolute physical constraints of the borough, e.g. areas under water or at serious risk of flooding, that too provides a cast-iron reason for constraining the overall scale of development.

By adopting the ‘unconstrained’ objectively assessed need (as calculated by the government’s standard methodology) as Spelthorne’s housing target, the Council may be meeting the economic and to some degree social needs of the present BUT is compromising the ability of future generations to meet their own needs – the overriding requirement of sustainable development as per paragraph 7, NPPF (July 2021):

“At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.”

NOT EFFECTIVE

The Local Plan should be deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.

There is no credible Infrastructure Delivery Plan (IDP) to ensure that the Local Plan can be deliverable and live up to its claims on the necessary infrastructure being forthcoming.

The Council claim that they are reliant on other stakeholders for much of the information which they are still waiting on. This demonstrates that there has not been effective joint working on cross-boundary strategic matters such as the provision of education, health and transport – many questions remain unanswered and have been deferred rather than dealt with:

- There are many gaps and out of date figures in the IDP e.g. on Early Years provision, key transport infrastructure schemes such as Staines Bridge and public transport; and
- Spelthorne’s Local Cycling and Walking Infrastructure Plan (upon which much of the sustainable transport plans are based) was only published a few days before the Environment & Sustainability Committee meeting on 6<sup>th</sup> September 2022 and hence is outside the scope of this review as there wasn’t enough time for it to be properly evaluated – as a member of the LCWIP stakeholder group however I understood that much of it was aspirational, had not been fully costed and funding streams had not been identified as part of the plan

NOT JUSTIFIED

The Local Plan should be an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.

Paragraph 8 of the NPPF (July 2021) states:

“Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways...”

These are economic, social and environmental but there is a clear imbalance in the Local Plan which does not yet have an appropriate strategy for pursuing its environmental objectives. The current evidence base does not demonstrate how the Pre-Submission Local Plan will improve biodiversity, use natural resources prudently, mitigate and adapt to climate change, including moving to a low carbon economy.

FYI The Habitats Regulations Assessment (HRA) was only published on 17<sup>th</sup> August 2022, relates primarily to the Southwest London Water Bodies SPA and needs further work. The Council only published their Climate Change Action Plan (CCAP) a few days before the Environment & Sustainability Committee meeting on 6<sup>th</sup> September 2022 and hence is outside the scope of this review as there wasn't enough time for it to be properly evaluated. There is still no current Biodiversity Action Plan (BAP).

Spelthorne's first BAP was written in 2008 and is referenced in the SA/SEA Scoping Report Update 2022 but no new BAP has been published and the two references to Spelthorne's BAP as “Key Evidence” in the Pre-Submission version approved by the Council on 19<sup>th</sup> May 2022 do not appear in the Regulation 19 Pre-Submission version of the Local Plan published less than a month later on 15<sup>th</sup> June 2022.

As mentioned above, Spelthorne's HRA was only published on 17<sup>th</sup> August 2022, over 2 months into the launch of the Reg 19 Consultation on 15<sup>th</sup> June 2022 and appeared to be the main reasons for the extension of the Reg 19 Consultation period from 5<sup>th</sup> September to the 19<sup>th</sup> September. In an email from SBC on 19<sup>th</sup> May 2022 to all Members, it was inferred that all evidence WOULD be published for the start of the consultation in June.

Furthermore, the Council belatedly commissioned Sustainability Advice at the E&S Committee meeting on 10<sup>th</sup> May 2022:

“to develop Supplementary Planning Guidance Documents which support the Local Plan but without affecting the viability of the emerging plan”

Its laudable that it is finally being done but Sustainability Advice surely should be at the heart of the Local Plan, not written after the fact - the obvious option to at least wait until it had been completed before moving to Regulation 19 was not deemed necessary.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

TO MAKE THE LOCAL PLAN CONSISTENT WITH NATIONAL POLICY

Add a new “part 1)” to ST1 which reflects the plan-making part of NPPF para 11 and adjust the housing target to reflect local supply-side constraints.

As it stands, it just appears that the Plan is MAXIMISING the density of development, rather than OPTIMISING the density of development which is the stated aim of Policy ST2, Part 4).

The local housing need has been calculated by taking the official housing projections and uplifting it to take account of local affordability. Significant local supply-side constraints indicate, however, that this unconstrained need is disproportionate to the land available and cannot be delivered sustainably.

Therefore, to comply with national policy the overall scale of development should be restricted by adjusting the borough's objectively assessed need (OAN) of 618 dwellings per annum (dpa) to factor in the major local supply-side constraints.

Ideally this should reflect the whole of Spelthorne's Green Belt (approximately 65% of the borough), an adjustment which could incorporate most, if not all, other supply-side constraints but, AT THE VERY LEAST, it should take account of the significant area which is unsuitable for residential development due to it being subject to one or more of the borough's absolute PHYSICAL constraints (e.g., but not limited to, water and functional floodplain, i.e. Flood Zone 3b) - a combined total of these constraints is estimated to be at least 30% of the borough.

It is accepted that there is an acute need for housing for local people and their families now and in the future and some densification is inevitable to accommodate their needs and economic progress. The OAN has, however, already been uplifted as part of the government's standard methodology to take account of local affordability. It is therefore recommended that the mid-point of the 30-65% range is taken, i.e. a reduction of approximately 50%, and it is applied before the final step of the standard methodology. This would be considered a reasonable compromise and accommodate densification where practical and where local services allow (or can be delivered to support it).

Restricting the overall scale of development by 50% would have the effect on the 2022 calculation of reducing 650 dpa (from Step 2 of the government calculation) to 325 dpa. Overall, at 325 dpa, this would still be DOUBLE the level of development in the last local plan (166 dpa). This would enable the local planning system to more equally balance the three overarching objectives set out in the national guidance and address social progress, economic well-being AND environmental protection:

☑ It would be much more deliverable than a target of (nearly) twice that number.

☑ It would enable the development of more family homes rather than largely 1 and 2 bed flats.

☑ It would greatly improve the opportunities for reducing emissions and pollution.

Hence, a target of 325 dpa would still help meet the needs of current and future residents but also more effectively align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.

TO MAKE THE LOCAL PLAN EFFECTIVE

A lot more work needs to be done with strategic partners on the Infrastructure Delivery Plan (IDP) to ensure that the Local Plan can be deliverable and live up to its claims on the necessary infrastructure being forthcoming.

A clear and complete IDP gap analysis needs to be provided on the latest evidence, not evidence which is in part over 5 years old. For example, the Surrey Highways Forward Programme\* of schemes totalling £67m quoted in the June 2022 IDP was last updated in November 2018, includes no rail schemes, hardly any bus schemes and £25m (in 2016 prices) of the £67m relates to an old, once-upon-a-time much-vaunted scheme for Staines Bridge Capacity Improvements which appears to have fallen by the wayside.

\*[https://www.surreycc.gov.uk/\\_\\_data/assets/pdf\\_file/0017/190232/Published-Spelthorne-Forward-Programme-2018\\_p1.pdf](https://www.surreycc.gov.uk/__data/assets/pdf_file/0017/190232/Published-Spelthorne-Forward-Programme-2018_p1.pdf)

It should be noted that the IDP was only published for the first time in April 2022 (and was subsequently updated in June 2022). The Regulation 19 stage is therefore the first chance the public have had the opportunity to comment on it.

TO ENSURE THE LOCAL PLAN CAN BE JUSTIFIED

Throughout the Local Plan process, the Council have not considered “reasonable alternatives”, instead presenting impossible choices or the unreasonable alternative of doing nothing. This needs to change.  
Members of the Council (and other stakeholders) need to be presented with an appropriate strategy taking into account REALISTIC alternatives where the Evidence Base is complete, up-to-date, balanced and is not purely seeking to fit the narrative and preconceived ideas.  
For whatever reason, the Council have been forced, pretty much since the Strategic Housing Market Assessment of 2015, to do whatever it takes to plan for the unachievable, a fourfold increase in housing delivery in the borough without the resources to sustain even the current rate of growth – this is a strategy which will blight the borough of Spelthorne and our main town of Staines-upon-Thames for decades to come, damaging our environment and ruining the character of our small and highly constrained borough which we like to call home.

**Question 6:** You can upload any modifications below.

RR(S)C LOCAL PLAN RESPONSE full 20 09 22\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618944/PDF/->

[/RR%5FS%5FC%20LOCAL%20PLAN%20RESPONSE%20full%2020%2009%2022%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618944/PDF/-/RR%5FS%5FC%20LOCAL%20PLAN%20RESPONSE%20full%2020%2009%2022%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Nigel Rowe (33516193)</b>
<b>Organisation: Riverside Residents (Staines) Coalition</b>

<b>Response ID: 1121181</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST1: Presumption in Favour of Sustainable Development</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
<p>APPENDIX 1:</p> <p>I believe the Local Plan:</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> is not sustainable</li> <li><input checked="" type="checkbox"/> is driven by a top-down housing target which does not take into account local circumstances</li> <li><input checked="" type="checkbox"/> is not proportionate, either for the borough as a whole or for Staines in particular</li> </ul> <p>The Local Plan 2022-2037 does not comply with the presumption of sustainable development as defined by national policy. Furthermore, it does not pursue the three overarching objectives of the planning system (economic, social and environmental) in an equally balanced or mutually supportive way.</p> <p><b>NOT CONSISTENT WITH NATIONAL POLICY</b></p> <p>The Local Plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.</p>

The Foreword of the Local Plan (2 pages as signed by Cllrs Boughtflower / Beardsmore / Harvey) is damning and demonstrates that the Local Plan is not based on the principles of sustainable development. Quotes as follows:

“Forget the semantics that it is a ‘housing need’ figure; it is for all practical purposes a rigid target. Every statement by an MP that it is not mandatory looks increasingly vacuous as authority after authority has seen their plan fail at the housing number hurdle.”

“No Spelthorne councillor wants to build on our Green Belt, nor do we want to populate our town centres with sterile, high-rise blocks. But that is what Westminster is demanding.”

“618 homes per year, compared to the target of 166 in our Core Strategy from 2009, represents an increase that will damage our environment and ruin the character of our small and highly constrained borough.”

Furthermore, in Footnote 10 to Table 1 on p.20 of the Pre-Submission version of the Local Plan, the Council define housing need as an “unconstrained assessment of the number of homes needed”. Ministers have repeatedly said that the OAN is a starting point.

In addition, national policy does NOT require meeting the government’s calculation of objectively assessed need where it is impractical and inconsistent with achieving sustainable development. Local Plan Policy ST1 leaves out where it might be inconsistent with achieving sustainable development which is discussed in paragraph 11, NPPF (July 2021).

Given the extent of Green Belt in the Borough, the strategic value of which is largely undisputed, that in itself provides a very strong reason for restricting the overall scale of development in the plan area. This is especially the case as in Spelthorne there are no areas classified as anything other than Green Belt (65%) or Urban (35%). Even when considering the absolute physical constraints of the borough, e.g. areas under water or at serious risk of flooding, that too provides a cast-iron reason for constraining the overall scale of development.

By adopting the ‘unconstrained’ objectively assessed need (as calculated by the government’s standard methodology) as Spelthorne’s housing target, the Council may be meeting the economic and to some degree social needs of the present BUT is compromising the ability of future generations to meet their own needs – the overriding requirement of sustainable development as per paragraph 7, NPPF (July 2021):

“At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.”

NOT EFFECTIVE

The Local Plan should be deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.

There is no credible Infrastructure Delivery Plan (IDP) to ensure that the Local Plan can be deliverable and live up to its claims on the necessary infrastructure being forthcoming.

The Council claim that they are reliant on other stakeholders for much of the information which they are still waiting on. This demonstrates that there has not been effective joint working on cross-boundary strategic matters such as the provision of education, health and transport – many questions remain unanswered and have been deferred rather than dealt with:



- There are many gaps and out of date figures in the IDP e.g. on Early Years provision, key transport infrastructure schemes such as Staines Bridge and public transport; and
- Spelthorne's Local Cycling and Walking Infrastructure Plan (upon which much of the sustainable transport plans are based) was only published a few days before the Environment & Sustainability Committee meeting on 6<sup>th</sup> September 2022 and hence is outside the scope of this review as there wasn't enough time for it to be properly evaluated – as a member of the LCWIP stakeholder group however I understood that much of it was aspirational, had not been fully costed and funding streams had not been identified as part of the plan

The Local Plan should be an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.

Paragraph 8 of the NPPF (July 2021) states:

“Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways...”

These are economic, social and environmental but there is a clear imbalance in the Local Plan which does not yet have an appropriate strategy for pursuing its environmental objectives. The current evidence base does not demonstrate how the Pre-Submission Local Plan will improve biodiversity, use natural resources prudently, mitigate and adapt to climate change, including moving to a low carbon economy.

FYI The Habitats Regulations Assessment (HRA) was only published on 17<sup>th</sup> August 2022, relates primarily to the Southwest London Water Bodies SPA and needs further work. The Council only published their Climate Change Action Plan (CCAP) a few days before the Environment & Sustainability Committee meeting on 6<sup>th</sup> September 2022 and hence is outside the scope of this review as there wasn't enough time for it to be properly evaluated. There is still no current Biodiversity Action Plan (BAP).

Spelthorne's first BAP was written in 2008 and is referenced in the SA/SEA Scoping Report Update 2022 but no new BAP has been published and the two references to Spelthorne's BAP as “Key Evidence” in the Pre-Submission version approved by the Council on 19<sup>th</sup> May 2022 do not appear in the Regulation 19 Pre-Submission version of the Local Plan published less than a month later on 15<sup>th</sup> June 2022.

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Furthermore, the Council belatedly commissioned Sustainability Advice at the E&S Committee meeting on 10<sup>th</sup> May 2022:

“to develop Supplementary Planning Guidance Documents which support the Local Plan but without affecting the viability of the emerging plan”

It's laudable that it is finally being done but Sustainability Advice surely should be at the heart of the Local Plan, not written after the fact - the obvious option to at least wait until it had been completed before moving to Regulation 19 was not deemed necessary.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

APPENDIX 1:

#### TO MAKE THE LOCAL PLAN CONSISTENT WITH NATIONAL POLICY

Add a new “part 1)” to ST1 which reflects the plan-making part of NPPF para 11 and adjust the housing target to reflect local supply-side constraints. rather than OPTIMISING the density of development which is the stated aim of Policy ST2, Part 4).

The local housing need has been calculated by taking the official housing projections and uplifting it to take account of local affordability. Significant local supply-side constraints indicate, however, that this unconstrained need is disproportionate to the land available and cannot be delivered sustainably. Therefore, to comply with national policy the overall scale of development should be restricted by adjusting the borough’s objectively assessed need (OAN) of 618 dwellings per annum (dpa) to factor in the major local supply-side constraints.

Ideally this should reflect the whole of Spelthorne’s Green Belt (approximately 65% of the borough), an adjustment which could incorporate most, if not all, other supply-side constraints but, AT THE VERY LEAST, it should take account of the significant area which is unsuitable for residential development due to it being subject to one or more of the borough’s absolute PHYSICAL constraints (e.g., but not limited to, water and functional floodplain, i.e. Flood Zone 3b) - a combined total of these constraints is estimated to be at least 30% of the borough.

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Restricting the overall scale of development by 50% would have the effect on the 2022 calculation of reducing 650 dpa (from Step 2 of the government calculation) to 325 dpa. Overall, at 325 dpa, this would still be DOUBLE the level of development in the last local plan (166 dpa). This would enable the local planning system to more equally balance the three overarching objectives set out in the national guidance and address social progress, economic well-being AND environmental protection:

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☑It would greatly improve the opportunities for reducing emissions and pollution.

Hence, a target of 325 dpa would still help meet the needs of current and future residents but also more effectively align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.

#### TO MAKE THE LOCAL PLAN EFFECTIVE

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hardly any bus schemes and £25m (in 2016 prices) of the £67m relates to an old, once-upon-a-time much-vaunted scheme for Staines Bridge Capacity Improvements which appears to have fallen by the wayside.

\*[https://www.surreycc.gov.uk/\\_\\_data/assets/pdf\\_file/0017/190232/Published-Spelthorne-Forward-Programme-2018\\_p1.pdf](https://www.surreycc.gov.uk/__data/assets/pdf_file/0017/190232/Published-Spelthorne-Forward-Programme-2018_p1.pdf)

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Members of the Council (and other stakeholders) need to be presented with an appropriate strategy taking into account REALISTIC alternatives where the Evidence Base is complete, up-to-date, balanced and is not purely seeking to fit the narrative and preconceived ideas.

For whatever reason, the Council have been forced, pretty much since the Strategic Housing Market Assessment of 2015, to do whatever it takes to plan for the unachievable, a fourfold increase in housing delivery in the borough without the resources to sustain even the current rate of growth – this is a strategy which will blight the borough of Spelthorne and our main town of Staines-upon-Thames for decades to come, damaging our environment and ruining the character of our small and highly constrained borough which we like to call home.

Please see attached document for full response. May nee to provide summary.

**Question 6:** You can upload any modifications below.

RR(S)C LOCAL PLAN RESPONSE full 20 09 22\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618945/PDF/->

[/RR%5FS%5FC%20LOCAL%20PLAN%20RESPONSE%20full%2020%2009%2022%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618945/PDF/-/RR%5FS%5FC%20LOCAL%20PLAN%20RESPONSE%20full%2020%2009%2022%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Nigel Rowe (33516193)</b>
<b>Organisation: Riverside Residents (Staines) Coalition</b>

<b>Response ID: 1120715</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
1.1 We are not expert in planning law, but we have studied the Spelthorne Local Plan closely and endeavour in this paper to make a coherent case for why it must be rejected. We have also made best efforts not to misunderstand or misrepresent what the Council proposes. In general terms, but especially as it relates to Staines, we contend that the Spelthorne Local Plan a) has not been 'Positively prepared' in that it has not adhered to the appropriate process in its preparation, does not provide a clear strategy, or seek to meet 'objectively assessed needs', or have sufficient supporting evidence from third-party infrastructure providers; b) is not 'Justified' in that it has not taken into account reasonable alternatives; c) is not 'Effective' in that there is significantly insufficient evidence to assert it can be delivered; and d) is therefore not 'Consistent with national policy' in some key respects. 1.2 Not one Spelthorne Borough Councillor had a positive word to say about the Local Plan when it was discussed and approved (as the Pre-submission version to Reg 19 for consultation) by the full Council on May 19, 2022. Furthermore, the Council approved the Plan then despite it missing a number of

essential 'supporting evidence' documents. The two-page introduction to the Local Plan by those responsible for it admits it "pleases no-one". In our view the introduction itself is an eloquent explanation for why it should have been strangled at birth. The 'commitment' to build 618 new homes every year is four times the demands of the extant Local Plan of 2009. The Council has accepted this, despite asserting (in the introduction) that meeting this so-called target "will damage our environment and ruin the character of our small and highly constrained borough" and that "No Spelthorne Councillor wants to build on our Green Belt, nor do we want to populate our town centres with sterile high-rise blocks."

1.3 The Local Plan document is detailed and explicit only about housing numbers and densities. It is essentially vague, aspirational sometimes to the point of fantasy and often contradictory, in respect of what will be needed to deliver such a dramatically transformative overdevelopment of the town – other than in the intention to pepper it with tower-blocks of tiny flats up to 15/16 storeys high where most of what would be around them is two-to-four storeys and nothing higher than five or six storeys.

1.4 Only one of the nine Staines ward Councillors voted for the Local Plan, and it seems clear that it received majority support in the Council Chamber (despite it being an incomplete document at the time) because the overwhelming burden of meeting the defined 'housing target' was dumped on Staines: more than 55 per cent of the borough's target, resulting in a 50% increase in the town's population.

1.5 The absolute physical constraints in the borough (including areas under water or at serious risk of flooding), and the impact of the proposed gross overdevelopment of Staines, is a clear justification for a reduced housing delivery aspiration. Indeed, Staines is one of the borough's most constrained areas in terms of flood risk, which makes the housing allocation to Staines even more perverse. The Local Plan is an indictment of the Council's refusal to accept the government's invitation to produce a Plan that would justify a lower housing 'target' and take appropriate account of the many significant local constraints in the borough (as well as the dramatic wrecking of Staines). To have not even tried has not been well received in the community.

1.6 We believe the Local Plan is profoundly unsound and the 'Staines Development Framework' (one of the Plan's key supporting documents) is deeply flawed not least because it fails to demonstrate, as it claims to do, "how the town can grow in a sustainable and sensitive way, delivering for our residents, while offering the necessary protection for areas". It provides alarmingly insufficient actual evidence that Staines can "accommodate the growth required for the Local Plan to be successfully delivered". Also, much of the evidence in some key areas was clearly collected retrospectively (and published late), contrary to the Evidence Requirements of the government's Procedure Guide for Local Plan Examination.

1.7 We believe there is a very strong case for major modifications to the Plan to reduce the impact on Staines, recognising that this would call for a more equitable sharing of the 'target' across the borough or a lower 'housing target' for the borough as a whole. Close to 4,000 residents signed a petition in 2021 opposing high-rise overdevelopment in the town and calling for a more equitable share of the burden across the borough. (This was given a sympathetic hearing when discussed by the full Council, but then ignored). In an independently managed survey of residents' opinions completed in mid-September 2022, less than 3% said they believe the Council's proposed plans for Staines are "fair", "desirable" or "sustainable".

1.8 Of particular concern to Staines residents has been Spelthorne Borough Council's failure to meet its constitutional obligation "to work in partnership with residents to make Spelthorne a place where people are fully engaged, and to encourage the active involvement of the community in the decisions that affect them". Section 2.2 'Community Communications and Consultation' gives explicit detail on this.

1.8 We accept that, even with a less draconian Local Plan, tower blocks of flats may well be a dominant feature of the Staines skyline and townscape of the future and that its status and character as a small/mid-size market town may well be transformed into something very different but as yet undefined. Although we believe the Plan and Staines Development Framework are (and will be found to be) fundamentally unsound, requiring major modifications, we have limited our main recommendations to those things that would mitigate the worst excesses of the ‘high-rise hell’ currently planned. (These are set out in ‘4: Recommendations’ on page 13.)

1.10 Our Coalition partners acknowledge and thank the authors of the Appendices to this paper, notably Peter Bower, Paul Dorman, Tony Woodward and especially Kath Sanders who we know has made other representations to the Planning Inspector which we commend and endorse.

## 2.1 PLAN DEVELOPMENT PROCESS ISSUES

2.1.1 From what we have been able to determine, the process for developing Spelthorne’s Local Plan was deeply flawed. Much of the groundwork for it was done during a period when the Council administration was, according to an independent inquiry (into a not unrelated matter), “fractured and patently dysfunctional”. Development of the Plan has been dogged by a blind acceptance of what the Council has deemed to be an unchallengeable government housing ‘target’ set by an algorithm based on significantly out-of-date information. The Council set about working backwards from a ‘target’ it had no idea whether it could reasonably deliver. It is not difficult to conclude that the political make-up of the Council was a prime driver for the hugely disproportionate burden of the ‘target’ being dumped on Staines.

2.1.2 How ‘Housing Need’ for the borough is defined, and how the number for Staines was arrived at, is at the heart of the problem. What the Local Plan describes as “the agreed local housing need” is of course a misnomer. The borough does not need 9,439 new homes and Staines does not need 5,440 of them. Appendix 1, page 15, sets out in some detail why the Local Plan is unsustainable in relation to what it proposes for Staines. The Council has not considered “reasonable alternatives”, instead presenting impossible choices or the unreasonable alternative of doing nothing. A realistic strategy is needed, taking account of REALISTIC alternatives where the Evidence Base is complete, up-to-date, balanced and is not purely seeking to fit the narrative and preconceived ideas. The Council appears to have been forced, pretty much since the Strategic Housing Market Assessment of 2015, to do whatever it takes to plan for the unachievable, a fourfold increase in housing delivery in the borough without the resources to sustain even the current rate of growth – this is a strategy which will blight the borough of Spelthorne and its main town of Staines for generations.

2.1.3 The Local Plan declares that “The Council is required to identify the infrastructure needed to support the development proposed over the next 15 years. This is done through the Infrastructure Delivery Plan”. However, the Infrastructure Delivery Plan, an absolutely key supporting document to the Local Plan, falls well short of doing this. It is mainly and at best aspirational and indicative, unsupported by commitments from providers that the needs of the Plan for Staines can be met. We give more detail on this in ‘3.1 Housing Delivery’ on page 7. Incidentally, the Infrastructure Delivery Plan was still being modified after the Council had approved the Local Plan for Reg 19 consultation.

2.1.4 The Council went through the motions of ‘consulting’, on what it determined to be ‘issues and options’ and its ‘preferred options’. It transpired these were essentially tick-box exercises to enable the Council to say it had ‘consulted’. There is more detail on this in ‘2.2: Community communications

and consultation' on page 5. The Council subsequently ignored requests that it publish what conclusions it had drawn from its consultations. It did not even respond to proposals for how it might communicate and consult with residents effectively on its Plan for the town when written.

2.1.5 When work began on how to deliver the Local Plan, the opinions and advice from Staines Councillors in the Staines Development Task Group were so unwelcome that it was disbanded in some acrimony (participating Councillors will confirm this). Its members were then subsumed and outnumbered within the Local Plan Task Group. The section in the Staines Development Framework on 'Engagement with Elected Members' is fanciful and reflects none of this reality (or that only one Staines Councillor voted for the Local Plan).

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## 2.2 COMMUNITY COMMUNICATIONS AND CONSULTATION

2.2.1 It is our view and experience that the Council has failed pretty spectacularly so far in its constitutional obligation "to work in partnership with residents to make Spelthorne a place where people are fully engaged, and to encourage the active involvement of the community in the decisions that affect them". Nor has it followed the Local Government Association definition of a 'consultation' as an activity that "gives local people a voice and an opportunity to influence important documents. It involves listening to and learning from local people before decisions are made or priorities set".

2.2.2 The Council makes bold claims for its community communications and willingness to accommodate community views through its consultations. The reality is very different. Residents, in Staines anyway, feel their views have yet to have any account taken of them. The Council essentially chose to ignore the petition signed by close to 4,000 residents in 2021 opposing high-rise overdevelopment in the town and calling for a more equitable share of the burden across the borough. This 'tinear' to residents views is fully reflected in the independently conducted survey of residents' opinions on aspects and consequences of the Local Plan and plans for Staines conducted in August/September 2022, the full findings of which are at Appendix 6, page 48. More than 600 residents participated.

The following are among the key findings:

- Less than 3% of residents surveyed think the plan is "fair", less than 2% think it is "desirable", less than 1% think it is "sustainable" ... and less than 2% think it meets the "local housing need".
- Support for limiting the height of new developments in sensitive areas of the town is also overwhelming: 'very important' within 50 metres of the river (95%), 'very important' in the Staines Conservation Area (95%), and 'very important' immediately next to existing residential areas (87%). 90% believe there should be NO exceptions to the zoning restrictions.
- Concern for the provision of all the necessary infrastructure (from schools, medical services, and utilities to roads, public transport, leisure and entertainment) is also overwhelming.
- 75% feel the Council has explained its plans for the town "poorly", and only 1% think this was done "very well".

- 44% of all those surveyed had participated in the Council’s earlier ‘public consultations’ before the Local Plan was written. Less than 2% feel their views were listened to.

2.2.3 It was at best disingenuous of the Council to ask residents in its earlier consultations for their views on things that had already been decided as if they were still under consideration. The issue of high-rise is a classic example of this. At exactly the same time the Council was asking residents (in the summer of 2021) how they felt about various aspects of possible high-rise developments in Staines, its Officers were recommending approval of 15-storey twin towers of tiny flats on the Old Telephone Exchange and Masonic Hall site and discussing potential high-rise developments elsewhere with other developers. Opposition to high-rise developments was the most prominent finding of the Council’s consultation, and yet this was dismissed by some in the Council at the time as being unclear and unhelpful because there was ambiguity about what constituted ‘high-rise’. But it surely didn’t take a public consultation for the Council to conclude that tower blocks of tiny flats, three times higher than anything around them, in highly sensitive areas was a bad idea (although it appears from the Local Plan and Staines Development Framework that the Council has every intention of doing precisely this anyway – viz 2.2.4 for just one example).

### 3 POLICY ISSUES

In this section we focus on just three policy areas/issues that are specific to our recommended modifications (as set out in section 4, page 13, and in the Appendices): Housing Delivery, Protecting Sensitive Areas, Architecture and Design Standards.

#### 3.1 HOUSING DELIVERY

3.1.1 Issues of specific concern that relate to the proposed overdevelopment of Staines with 55% of the borough’s entire housing target are infrastructure provision and delivery, utilities, climate emergency and managing flood risk.

3.1.2 Spelthorne Borough Council rejected out of hand from the outset suggestions from government sources, including Ministers and the local MP (now Chancellor of the Exchequer), that it should produce a Local Plan that it believed to be achievable and sustainable, that takes full account of the borough’s significant natural constraints, and one that better reflects the borough’s actual housing needs.

3.1.3 Instead, the Council chose not even to try, and insisted that the government has demanded that it must meet an immutable target of 618 new homes every year (four times the demands of the extant Local Plan of 2009). It has accepted this, despite asserting (in the introduction to the Local Plan) that meeting it “will damage our environment and ruin the character of our small and highly constrained borough” and that “No Spelthorne Councillor wants to build on our Green Belt, nor do we want to populate our town centres with sterile high-rise blocks.”

3.1.4 It is abundantly clear from reading the Local Plan that the Council has taken a ‘top down’ approach in attempting to shoe-horn a litre into a pint pot. It has sought to deliver an unrealistic housing target with no clear idea of whether, let alone how, it can be done. The only way it thought it might have a shot at this is to dump 55% of the borough’s entire housing target on Staines; but it then discovered the only way to do that is to pepper the town with tower-blocks of tiny flats on almost every available brownfield site and give itself the freedom to do this even in sensitive areas (such as the riverfront and Conservation Area). However, Staines is perhaps the worst area in the borough for flood risk (Appendix 3, page 26) and some of the identified sites



have already been declared 'non-viable' under all the scenarios explored and very unlikely to deliver the requisite percentages of affordable homes. Delivering the Plan would also violate many of the demands of the Climate Emergency (Appendix 2, page 20). Please see pages 1-20 in attached document as content is too large to add.

**Question 6:** You can upload any modifications below.

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[/RR%5FS%5FC%20LOCAL%20PLAN%20RESPONSE%20full%2020%2009%2022%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618933/PDF/-/RR%5FS%5FC%20LOCAL%20PLAN%20RESPONSE%20full%2020%2009%2022%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Nigel Rowe (33516193)</b>
<b>Organisation: Riverside Residents (Staines) Coalition</b>

<b>Response ID: 1120853</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
HOUSING DELIVERY Issues of specific concern that relate to the proposed overdevelopment of Staines with 55% of the borough's entire housing target are infrastructure provision and delivery, utilities, climate emergency and managing flood risk. Spelthorne Borough Council rejected out of hand from the outset suggestions from government sources, including Ministers and the local MP (now Chancellor of the Exchequer), that it should produce a Local Plan that it believed to be achievable and sustainable, that takes full account of the borough's significant natural constraints, and one that better reflects the borough's actual housing needs. Instead, the Council chose not even to try, and insisted that the government has demanded that it must meet an immutable target of 618 new homes every year (four times the demands of the extant Local Plan of 2009). It has accepted this, despite asserting (in the introduction to the Local Plan) that meeting it "will damage our environment and ruin the character of our small and highly constrained borough" and that "No Spelthorne Councillor wants to build on our Green Belt, nor do we want to populate our town centres with sterile high-rise blocks."

It is abundantly clear from reading the Local Plan that the Council has taken a 'top down' approach in attempting to shoe-horn a litre into a pint pot. It has sought to deliver an unrealistic housing target with no clear idea of whether, let alone how, it can be done. The only way it thought it might have a shot at this is to dump 55% of the borough's entire housing target on Staines; but it then discovered the only way to do that is to pepper the town with tower-blocks of tiny flats on almost every available brownfield site and give itself the freedom to do this even in sensitive areas (such as the riverfront and Conservation Area). However, Staines is perhaps the worst area in the borough for flood risk (Appendix 3, page 26) and some of the identified sites have already been declared 'non-viable' under all the scenarios explored and very unlikely to deliver the requisite percentages of affordable homes. Delivering the Plan would also violate many of the demands of the Climate Emergency (Appendix 2, page 20).

Putting to one side that the full Council signed off the Local Plan in May when it was missing several critical supporting evidence documents, some of these (the latest delivered in mid-August) are still incomplete or in places simply fanciful aspirations. A clear example of this is the mission-critical Infrastructure Delivery Plan first issued with substantial gaps in April 2022 and still being updated in June (after the Council had approved the Local Plan for Reg 19 consultation).

The housing 'target' for Staines must be reduced. This could be achieved by agreement with the government for a lower number for the borough, or a more proportionate distribution across the borough of the currently so-called "agreed level of housing need". There should also be a clear commitment in the Local Plan and Staines Development Framework that the distribution of the "agreed level of housing need" across the borough, and particularly the allocation to Staines, is not fixed and may change over the plan period as and when circumstances and opportunities for variations arise.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

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Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Nigel Rowe (33516193)</b>
<b>Organisation: Riverside Residents (Staines) Coalition</b>

<b>Response ID: 1120857</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
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Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
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If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>1 INTRODUCTION</p> <p>1.1 We are not expert in planning law, but we have studied the Spelthorne Local Plan closely and endeavour in this paper to make a coherent case for why it must be rejected. We have also made best efforts not to misunderstand or misrepresent what the Council proposes. In general terms, but especially as it relates to Staines, we contend that the Spelthorne Local Plan a) has not been ‘Positively prepared’ in that it has not adhered to the appropriate process in its preparation, does not provide a clear strategy, or seek to meet ‘objectively assessed needs’, or have sufficient supporting evidence from third-party infrastructure providers; b) is not ‘Justified’ in that it has not taken into account reasonable alternatives; c) is not ‘Effective’ in that there is significantly insufficient evidence to assert it can be delivered; and d) is therefore not ‘Consistent with national policy’ in some key respects.</p> <p>Not one Spelthorne Borough Councillor had a positive word to say about the Local Plan when it was discussed and approved (as the Pre-submission version to Reg 19 for consultation) by the full Council on May 19, 2022. Furthermore, the Council approved the Plan then despite it missing a number of</p>	

essential 'supporting evidence' documents. The two-page introduction to the Local Plan by those responsible for it admits it "pleases no-one". In our view the introduction itself is an eloquent explanation for why it should have been strangled at birth. The 'commitment' to build 618 new homes every year is four times the demands of the extant Local Plan of 2009. The Council has accepted this, despite asserting (in the introduction) that meeting this so-called target "will damage our environment and ruin the character of our small and highly constrained borough" and that "No Spelthorne Councillor wants to build on our Green Belt, nor do we want to populate our town centres with sterile high-rise blocks."

The Local Plan document is detailed and explicit only about housing numbers and densities. It is essentially vague, aspirational sometimes to the point of fantasy and often contradictory, in respect of what will be needed to deliver such a dramatically transformative overdevelopment of the town – other than in the intention to pepper it with tower-blocks of tiny flats up to 15/16 storeys high where most of what would be around them is two-to-four storeys and nothing higher than five or six storeys. Only one of the nine Staines ward Councillors voted for the Local Plan, and it seems clear that it received majority support in the Council Chamber (despite it being an incomplete document at the time) because the overwhelming burden of meeting the defined 'housing target' was dumped on Staines: more than 55 per cent of the borough's target, resulting in a 50% increase in the town's population.

The absolute physical constraints in the borough (including areas under water or at serious risk of flooding), and the impact of the proposed gross overdevelopment of Staines, is a clear justification for a reduced housing delivery aspiration. Indeed, Staines is one of the borough's most constrained areas in terms of flood risk, which makes the housing allocation to Staines even more perverse. The Local Plan is an indictment of the Council's refusal to accept the government's invitation to produce a Plan that would justify a lower housing 'target' and take appropriate account of the many significant local constraints in the borough (as well as the dramatic wrecking of Staines). To have not even tried has not been well received in the community. We believe the Local Plan is profoundly unsound and the 'Staines Development Framework' (one of the Plan's key supporting documents) is deeply flawed not least because it fails to demonstrate, as it claims to do, "how the town can grow in a sustainable and sensitive way, delivering for our residents, while offering the necessary protection for areas". It provides alarmingly insufficient actual evidence that Staines can "accommodate the growth required for the Local Plan to be successfully delivered". Also, much of the evidence in some key areas was clearly collected retrospectively (and published late), contrary to the Evidence Requirements of the government's Procedure Guide for Local Plan Examination.

We believe there is a very strong case for major modifications to the Plan to reduce the impact on Staines, recognising that this would call for a more equitable sharing of the 'target' across the borough or a lower 'housing target' for the borough as a whole. Close to 4,000 residents signed a petition in 2021 opposing high-rise overdevelopment in the town and calling for a more equitable share of the burden across the borough. (This was given a sympathetic hearing when discussed by the full Council, but then ignored). In an independently managed survey of residents' opinions completed in mid-September 2022, less than 3% said they believe the Council's proposed plans for Staines are "fair", "desirable" or "sustainable".

Of particular concern to Staines residents has been Spelthorne Borough Council's failure to meet its constitutional obligation "to work in partnership with residents to make Spelthorne a place where people are fully engaged, and to encourage the active involvement of the community in the decisions that affect them". Section 2.2 'Community Communications and Consultation' gives explicit detail on this.

We accept that, even with a less draconian Local Plan, tower blocks of flats may well be a dominant feature of the Staines skyline and townscape of the future and that its status and character as a small/mid-size market town may well be transformed into something very different but as yet undefined. Although we believe the Plan and Staines Development Framework are (and will be found to be) fundamentally unsound, requiring major modifications, we have limited our main recommendations to those things that would mitigate the worst excesses of the 'high-rise hell' currently planned. (These are set out in '4: Recommendations' on page 13.)

Our Coalition partners acknowledge and thank the authors of the Appendices to this paper, notably Peter Bower, Paul Dorman, Tony Woodward and especially Kath Sanders who we know has made other representations to the Planning Inspector which we commend and endorse.

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No Response

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<b>Organisation: Riverside Residents (Staines) Coalition</b>

<b>Response ID: 1120858</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
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Yes/No/Not answered: No Response   Additional Comments: No Response
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Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
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<p>2 LOCAL PLAN DEVELOPMENT  PLAN DEVELOPMENT PROCESS ISSUES</p> <p>From what we have been able to determine, the process for developing Spelthorne’s Local Plan was deeply flawed. Much of the groundwork for it was done during a period when the Council administration was, according to an independent inquiry (into a not unrelated matter), “fractured and patently dysfunctional”. Development of the Plan has been dogged by a blind acceptance of what the Council has deemed to be an unchallengeable government housing ‘target’ set by an algorithm based on significantly out-of-date information. The Council set about working backwards from a ‘target’ it had no idea whether it could reasonably deliver. It is not difficult to conclude that the political make-up of the Council was a prime driver for the hugely disproportionate burden of the ‘target’ being dumped on Staines.</p> <p>How ‘Housing Need’ for the borough is defined, and how the number for Staines was arrived at, is at the heart of the problem. What the Local Plan describes as “the agreed local housing need” is of course a misnomer. The borough does not need 9,439 new homes and Staines does not need 5,440 of them. Appendix 1, page 15, sets out in some detail why the Local Plan is unsustainable in relation to what it proposes for Staines. The Council has not</p>

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#### COMMUNITY COMMUNICATIONS AND CONSULTATION

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borough. This ‘tin-ear’ to residents views is fully reflected in the independently conducted survey of residents’ opinions on aspects and consequences of the Local Plan and plans for Staines conducted in August/September 2022, the full findings of which are at Appendix 6, page 48. More than 600 residents participated. The following are among the key findings:

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- 75% feel the Council has explained its plans for the town “poorly”, and only 1% think this was done “very well”.
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It was at best disingenuous of the Council to ask residents in its earlier consultations for their views on things that had already been decided as if they were still under consideration. The issue of high-rise is a classic example of this. At exactly the same time the Council was asking residents (in the summer of 2021) how they felt about various aspects of possible high-rise developments in Staines, 5

its Officers were recommending approval of 15-storey twin towers of tiny flats on the Old Telephone Exchange and Masonic Hall site and discussing potential high-rise developments elsewhere with other developers. Opposition to high-rise developments was the most prominent finding of the Council’s consultation, and yet this was dismissed by some in the Council at the time as being unclear and unhelpful because there was ambiguity about what constituted ‘high-rise’. But it surely didn’t take a public consultation for the Council to conclude that tower blocks of tiny flats, three times higher than anything around them, in highly sensitive areas was a bad idea (although it appears from the Local Plan and Staines Development Framework that the Council has every intention of doing precisely this anyway – viz 2.2.4 for just one example).

In the Council’s ‘Issues and Options’ document of 2019, the riverside Bridge Street Car Park site in the Staines Conservation Area was earmarked in its summary introduction for 75 homes (with the possibility of a 200-room hotel as an alternative buried in the body of the document). Then, in May 2020, the shock announcement (for Councillors as well as the community) of a contract between the Council and a developer for a 14-storey 350-room hotel plus 200 apartments on the site. The subsequent independent inquiry into the provenance of the contract, conducted by a lawyer recruited from the Local Government Organisation, determined that the decision was taken at a time when the Council’s administration was “fractured and patently dysfunctional”. The slightly smaller scheme announced recently is still a far cry from what was originally envisaged in 2019 and, in the words of one Councillor before the decision was taken, “drives a coach and horses” through the Council’s Local Plan zoning proposals for the riverfront and Conservation Area.

The Council's communications on its plans for Staines have significantly underplayed the intended massive transformation of its appearance, character, amenity and population. The Council refused to produce a model of 'Staines of the Future', not even a digital model, to inform its public consultation on the Local Plan in 2022. Instead it chose to represent what is planned through a few drawings whose perspective minimised the scale of the transformation and also missed out some of the planned developments. Those who visited the Council's displays in the Elmsleigh Centre and High Street were given assurances on the provision of infrastructure and utilities that were and remain unsubstantiated by available evidence. The scale of the transformation in terms of its life-style demands were grossly underplayed. For example, the contradiction in a commitment that there will be no more public parking spaces in the town than there are today and an acceptance of very few parking spaces in the new tower-block developments, despite a 50% population increase and an ambition to make Staines a place people will want to visit.

The Staines Development Framework makes a clear commitment to "deliver an ambitious and viable vision for the transformation and regeneration of the whole town" (even though the Viability Statement admits five of the identified sites are 'non-viable'!). In the section on 'Policy SP1' it declares that "Any proposed tall buildings will be designed to reflect the redefined character of Staines". Nowhere in the Framework is there any description or explanation of what the "redefined character of Staines" is. Yet this is fundamental to what the town will be allowed to become, to look like, and to live in. Stakeholders, not least residents, are surely entitled to be given a clear understanding of the Council's 'vision' of what will replace the town's current character – in simple language not architect-speak and with a physical or at least 3D digital model. Not to have done this to inform the 'public consultation', as recommended to the Council back in May, is a huge disrespect, insult even, to the community. Redefining the character of a town has significant impacts for future generations and must not be rushed through with a few illustrative sketches. Such radical change should demand much more transparency and public consultation, and not be treated in a way one might deal with a simple updating of an existing Local Plan. One of our considerable concerns, given recent experience and examples, is what the Council regards as acceptable architecture and design. We therefore commissioned and submitted proposed 'Design Guides and Codes' (Appendix 5, page 40) for the Council's consideration in April 2022 (as yet with no acknowledgement, let alone comment, from the Council). At one of the Council's 'consultation' events in the Elmsleigh Centre this summer we commented on the uninspiring design of proposed new developments and were told they were merely illustrative and would be 'upgraded'. We do not know, and may never know, the findings of the Council's 'public consultation' on the Local Plan. We know it has been the subject of a great deal of criticism from residents. But the mechanism for providing feed-back on-line through the Council's website presented a hurdle that will have been insurmountable for the man/woman in the street. The multiple questions and questionnaires asking for views on legal compliance and other technical aspects of 'soundness' on the overall Plan and specific aspects of it were beyond most ordinary mortals.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Nigel Rowe (33516193)</b>
<b>Organisation: Riverside Residents (Staines) Coalition</b>

<b>Response ID: 1120864</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p><b>PROTECTING SENSITIVE AREAS</b></p> <p>The principle of zoning areas of the town for different heights and densities of developments, as set out in the Staines Development Framework, is extremely welcome, or would be if it reflected a serious intent (see 3.2.3 below). It is also an obvious requirement for such a far-reaching development plan for any town. This is particularly the case for a town where most of its buildings are two-to-four storeys (with very little higher than five or six), as well as having extremely sensitive locations such as a highly prized riverfront, Conservation Area, and existing dense residential areas. The Staines Development Framework describes the river as the town’s “outstanding natural asset”. It acknowledges that the town “has significant character through the Staines Conservation Area and proximity to and views of the river. There is therefore an expectation that any new development which affects the setting of the Conservation Area or river will respect the character of this and enhance it”.</p> <p>In fact, ‘heritage and conservation’ is very properly referenced many times in the Local Plan and Staines Development Framework. Among them in the Local Plan: “Our Plan will also protect the Borough’s historic environment, including our listed buildings and Conservation Areas, which contribute to the Borough’s character, sense of place and quality of life ... the Council will continue to conserve and enhance the character and setting of the existing</p>	

conservation areas ... the Council will require proposals for new development to demonstrate that they will make a positive contribution to the setting and local character of the conservation area ...". But, as with other aspects of the Local Plan and Staines Development Framework, there is little of substance to support this being a genuine intent, and Council decisions to date have tended to prove quite the opposite. Appendix 4, page 34, deals with the issues and concerns relating to conservation and heritage in greater detail.

There are two fundamental and wholly unacceptable flaws in the proposed zoning arrangements for Staines:

- There are important aspects of the zoning map that lack consistency and logic. For example, there is no consistency or logic in the Riverfront Protection Zone being defined by a road and as a consequence tapering to nothing at one end. It surely needs to be principally a defined distance from the riverfront it seeks to protect.
- If the Council is serious about protecting sensitive areas there should be NO exemptions, particularly those that would disfigure the town for generations in return for some short/mid-term gain. The residents' survey (Appendix 6, page 48) indicates overwhelming opposition to there being ANY exceptions to the zoning plan ('very important' within 50 metres of the river: 95%. 'Very important' in the Staines Conservation Area: 95%. 'Very important' immediately adjacent to existing residential areas: 87%). The Development Framework's definition of what might be acceptable grounds for an exemption from the zoning map is currently so loosely written that the zoning scheme is rendered a virtually worthless piece of tokenism. Under the proposed arrangements, all a developer has to do is throw in a bit of 'social housing' or a few extra bob for Council coffers. This is exacerbated by there being no clarity on who takes the decisions. To have any real value, and assuming a case can be made for there to be exemptions, the grounds for allowing them must be extremely narrowly and clearly defined. There must be a serious, robust and challenging route to achieving such status. They must be subject to a public consultation, and be granted only if they are subsequently approved by the relevant ward's Councillors, an appropriate Committee, and the full Council.

There is plenty of evidence to challenge the Council's claimed commitment to an effective zoning scheme. Just three examples: 1) The Council has already and readily endorsed a massive zone-busting riverside development in the Conservation Area which it pledges in its 'Policy SP1' "will be preserved and enhanced". The Council had an opportunity to let the contract lapse after it had signed off the Local Plan for consultation but decided not to. This decision was justified on the grounds that Staines needs an upscale hotel, the Council needs the money, and the Council's reputation with developers must be protected! 2) The Council has ensured the Riverside Protection Zone has been drawn to exclude its own proposed riverside high-rise Thameside House redevelopment, a blatantly cynical ploy. This development also knowingly flouts the height restriction of the 'eight-storey' zone just back from the river. 3) The Council has also recently approved a development on the site between the Old Town Hall (which it will partially obscure) and the river, and either side of the Old Fire Station (which will also be somewhat obscured) - land currently designated as part of the Riverside Protection Zone, but sold by the Council to a developer. Little wonder that community trust and confidence is in such short supply (see also 2.2: 'Community consultation and communications', page 5).

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

The zoning policy must explicitly recognise the following as sensitive areas to be protected: the riverfront, the Conservation Area, and immediately adjacent to existing residential areas (not least to reflect very strong resident views per Appendix 6, page 48). The zoning map must be redrawn to provide consistency and logic. This applies especially (but not only) to the Riverside Protection Zone.

The hurdle to achieve 'exemption' status must be extremely high and unambiguously defined, the route to achieving this status must be challenging and open to easy public scrutiny, and there must be clarity on who takes the decisions. Exemptions must only be granted when truly exceptional advantages to the amenity and appearance of the area can be quantified and demonstrated. They must exclude all other considerations that do not relate to the amenity and appearance of the town (eg a short/medium-term financial contribution/advantage).

Proposed exemptions should be subject to a public consultation, and be granted only if they are subsequently approved by the relevant ward's Councillors, an appropriate Committee, and the full Council.

The "redefined character" of Staines must be articulated so stakeholders have a clear understanding of the Council's 'vision' for the town. There must be far greater clarity and definition of architecture and design standards. Some aspects of design are clearly subjective, but a good deal is measurable and has to do with context and surroundings, scale, detailing and materials. The creation of the Design Advisory Group, as proposed earlier this year by the Council's current Leader but not yet actioned (to include independent experts as well as experienced Council Officers, Councillors, and a residents' representative acceptable to Residents Associations) will be essential. It must have clear Terms of Reference (including for community communications) and published Design Guides and Codes that it will insist on.

**Question 6:** You can upload any modifications below.

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<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618936/PDF/-/RR%5FS%5FC%20LOCAL%20PLAN%20RESPONSE%20full%2020%2009%2022%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Nigel Rowe (33516193)</b>
<b>Organisation: Riverside Residents (Staines) Coalition</b>

<b>Response ID: 1121173</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Please provide summary for pages 1-14 of attached document(some listed below).	
1.1 We are not expert in planning law, but we have studied the Spelthorne Local Plan closely and endeavour in this paper to make a coherent case for why it must be rejected. We have also made best efforts not to misunderstand or misrepresent what the Council proposes. In general terms, but especially as it relates to Staines, we contend that the Spelthorne Local Plan a) has not been 'Positively prepared' in that it has not adhered to the appropriate process in its preparation, does not provide a clear strategy, or seek to meet 'objectively assessed needs', or have sufficient supporting evidence from third-party infrastructure providers; b) is not 'Justified' in that it has not taken into account reasonable alternatives; c) is not 'Effective' in that there is significantly insufficient evidence to assert it can be delivered; and d) is therefore not 'Consistent with national policy' in some key respects.	

1.2 Not one Spelthorne Borough Councillor had a positive word to say about the Local Plan when it was discussed and approved (as the Pre-submission version to Reg 19 for consultation) by the full Council on May 19, 2022. Furthermore, the Council approved the Plan then despite it missing a number of essential 'supporting evidence' documents. The two-page introduction to the Local Plan by those responsible for it admits it "pleases no-one". In our view the introduction itself is an eloquent explanation for why it should have been strangled at birth. The 'commitment' to build 618 new homes every year is four times the demands of the extant Local Plan of 2009. The Council has accepted this, despite asserting (in the introduction) that meeting this so-called target "will damage our environment and ruin the character of our small and highly constrained borough" and that "No Spelthorne Councillor wants to build on our Green Belt, nor do we want to populate our town centres with sterile high-rise blocks."

1.3 The Local Plan document is detailed and explicit only about housing numbers and densities. It is essentially vague, aspirational sometimes to the point of fantasy and often contradictory, in respect of what will be needed to deliver such a dramatically transformative overdevelopment of the town – other than in the intention to pepper it with tower-blocks of tiny flats up to 15/16 storeys high where most of what would be around them is two-to-four storeys and nothing higher than five or six storeys.

1.4 Only one of the nine Staines ward Councillors voted for the Local Plan, and it seems clear that it received majority support in the Council Chamber (despite it being an incomplete document at the time) because the overwhelming burden of meeting the defined 'housing target' was dumped on Staines: more than 55 per cent of the borough's target, resulting in a 50% increase in the town's population.

## 2 LOCAL PLAN DEVELOPMENT

### 2.1 PLAN DEVELOPMENT PROCESS ISSUES

2.1.1 From what we have been able to determine, the process for developing Spelthorne's Local Plan was deeply flawed. Much of the groundwork for it was done during a period when the Council administration was, according to an independent inquiry (into a not unrelated matter), "fractured and patently dysfunctional". Development of the Plan has been dogged by a blind acceptance of what the Council has deemed to be an unchallengeable government housing 'target' set by an algorithm based on significantly out-of-date information. The Council set about working backwards from a 'target' it had no idea whether it could reasonably deliver. It is not difficult to conclude that the political make-up of the Council was a prime driver for the hugely disproportionate burden of the 'target' being dumped on Staines.

2.1.2 How 'Housing Need' for the borough is defined, and how the number for Staines was arrived at, is at the heart of the problem. What the Local Plan describes as "the agreed local housing need" is of course a misnomer. The borough does not need 9,439 new homes and Staines does not need 5,440 of them. Appendix 1, page 15, sets out in some detail why the Local Plan is unsustainable in relation to what it proposes for Staines. The Council has not considered "reasonable alternatives", instead presenting impossible choices or the unreasonable alternative of doing nothing. A realistic strategy is needed, taking account of REALISTIC alternatives where the Evidence Base is complete, up-to-date, balanced and is not purely seeking to fit the narrative and preconceived ideas. The Council appears to have been forced, pretty much since the Strategic Housing Market Assessment of 2015, to do whatever it takes to plan for the unachievable, a fourfold increase in housing delivery in the borough without the resources to sustain even the current rate of growth – this is a strategy which will blight the borough of Spelthorne and its main town of Staines for generations.



2.1.3 The Local Plan declares that “The Council is required to identify the infrastructure needed to support the development proposed over the next 15 years. This is done through the Infrastructure Delivery Plan”. However, the Infrastructure Delivery Plan, an absolutely key supporting document to the Local Plan, falls well short of doing this. It is mainly and at best aspirational and indicative, unsupported by commitments from providers that the needs of the Plan for Staines can be met. We give more detail on this in ‘3.1 Housing Delivery’ on page 7. Incidentally, the Infrastructure Delivery Plan was still being modified after the Council had approved the Local Plan for Reg 19 consultation.

## 2.2 COMMUNITY COMMUNICATIONS AND CONSULTATION

2.2.1 It is our view and experience that the Council has failed pretty spectacularly so far in its constitutional obligation “to work in partnership with residents to make Spelthorne a place where people are fully engaged, and to encourage the active involvement of the community in the decisions that affect them”. Nor has it followed the Local Government Association definition of a ‘consultation’ as an activity that “gives local people a voice and an opportunity to influence important documents. It involves listening to and learning from local people before decisions are made or priorities set”.

2.2.2 The Council makes bold claims for its community communications and willingness to accommodate community views through its consultations. The reality is very different. Residents, in Staines anyway, feel their views have yet to have any account taken of them. The Council essentially chose to ignore the petition signed by close to 4,000 residents in 2021 opposing high-rise overdevelopment in the town and calling for a more equitable share of the burden across the borough. This ‘tin-ear’ to residents views is fully reflected in the independently conducted survey of residents’ opinions on aspects and consequences of the Local Plan and plans for Staines conducted in August/September 2022, the full findings of which are at Appendix 6, page 48. More than 600 residents participated. The following are among the key findings:

- Less than 3% of residents surveyed think the plan is “fair”, less than 2% think it is “desirable”, less than 1% think it is “sustainable” ... and less than 2% think it meets the “local housing need”.

- Support for limiting the height of new developments in sensitive areas of the town is also overwhelming: ‘very important’ within 50 metres of the river (95%), ‘very important’ in the Staines Conservation Area (95%), and ‘very important’ immediately next to existing residential areas (87%). 90% believe there should be NO exceptions to the zoning restrictions.

- Concern for the provision of all the necessary infrastructure (from schools, medical services, and utilities to roads, public transport, leisure and entertainment) is also overwhelming.

- 75% feel the Council has explained its plans for the town “poorly”, and only 1% think this was done “very well”.

- 44% of all those surveyed had participated in the Council’s earlier ‘public consultations’ before the Local

## 3 POLICY ISSUES

In this section we focus on just three policy areas/issues that are specific to our recommended modifications (as set out in section 4, page 13, and in the Appendices): Housing Delivery, Protecting Sensitive Areas, Architecture and Design Standards.

### 3.1 HOUSING DELIVERY

3.1.1 Issues of specific concern that relate to the proposed overdevelopment of Staines with 55% of the borough's entire housing target are infrastructure provision and delivery, utilities, climate emergency and managing flood risk. 3.1.2 Spelthorne Borough Council rejected out of hand from the outset suggestions from government sources, including Ministers and the local MP (now Chancellor of the Exchequer), that it should produce a Local Plan that it believed to be achievable and sustainable, that takes full account of the borough's significant natural constraints, and one that better reflects the borough's actual housing needs. 3.1.3 Instead, the Council chose not even to try, and insisted that the government has demanded that it must meet an immutable target of 618 new homes every year (four times the demands of the extant Local Plan of 2009). It has accepted this, despite asserting (in the introduction to the Local Plan) that meeting it "will damage our environment and ruin the character of our small and highly constrained borough" and that "No Spelthorne Councillor wants to build on our Green Belt, nor do we want to populate our town centres with sterile high-rise blocks."

#### Infrastructure provision and delivery

3.1.6 In almost every aspect the Infrastructure Delivery Plan is merely aspirational and indicative, a summary of the obvious issues that need to be addressed, problems that need to be solved, and some ideas for how and where solutions might be sought and hopefully found. In places it is more like thinking-aloud musings. It is definitely not a 'plan'. It is clear that much of the town's infrastructure is already at or near capacity. There are many references to how new capacity will be assessed as each new individual development is proposed. But no-where is there any indication that infrastructure providers have modelled the impact of adding 5,440 new homes to Staines, increasing its population by about 10,000, roughly 50 per cent of what it is today. This is particularly the case in relation to utilities (eg water, electricity) where the demand for costly new physical infrastructure is an issue as well as supply. It also applies in areas such as road infrastructure, flood risk and climate change. Until at least some basic modelling work on this is done it is impossible to know whether the number of new homes for Staines demanded by the Local Plan is deliverable let alone sustainable ... and it is therefore impossible to assert that the Local Plan is 'sound'. Little wonder that in the residents' survey (Appendix 6, page 48) overwhelming concern was expressed about ten areas of infrastructure provision.

#### Utilities

3.1.11 Provision of the physical infrastructure as well as supply to meet the need especially for water and electricity is a massive problem for Staines, the size of the problem barely recognised in the Infrastructure Delivery Plan. This issue is exacerbated by the planned population growth elsewhere in and beyond Spelthorne and Surrey.

#### Climate Emergency and Managing Flood Risk

3.1.15 The Local Plan recognises that the Council has declared a 'climate emergency' and affirms that all development must respect and respond to it explicitly. However, the measures proposed in the Local Plan are an inadequate response to this and are more akin to rearranging deck chairs. Tackling the many aspects of climate change must surely be regarded as a major 'strategic policy', not treated as it is currently - downgraded to feature as part of the Plan's 'Place Making' strategy (notwithstanding the fact that this was seemingly an upgrade from where it was on 19 May as a 'design' policy (DS2) which is still widely referenced throughout the evidence documents and Local Plan itself).

#### 3.2 PROTECTING SENSITIVE AREAS

3.2.1 The principle of zoning areas of the town for different heights and densities of developments, as set out in the Staines Development Framework, is extremely welcome, or would be if it reflected a serious intent (see 3.2.3 below). It is also an obvious requirement for such a far-reaching development plan for any town. This is particularly the case for a town where most of its buildings are two-to-four storeys (with very little higher than five or six), as well as having extremely sensitive locations such as a highly prized riverfront, Conservation Area, and existing dense residential areas. The Staines Development Framework describes the river as the town's "outstanding natural asset". It acknowledges that the town "has significant character through the Staines Conservation Area and proximity to and views of the river. There is therefore an expectation that any new development which affects the setting of the Conservation Area or river will respect the character of this and enhance it".

### 3.3 ARCHITECTURE AND DESIGN STANDARDS

3.3.1 At a meeting of Spelthorne Borough Council in the Spring of 2022, the Council's current Leader proposed the creation of a design working group (including expert representation from/for the community). It would have very early engagement with the planning process while key issues are being considered. It was an idea that received generous cross-party support at the Council meeting, reflecting a broad recognition that current arrangements and processes are failing the community. This proposal has yet to be actioned. We commissioned and submitted proposed 'Design Guides and Codes' (Appendix 5, page 40) for the Council's consideration in April 2022 (as yet with not even an acknowledgement, let alone comment, from the Council).

### 4 RECOMMENDATIONS

It will be evident from the foregoing and the Appendices that we have many serious concerns about the Local Plan and Staines Development Framework, and the Council's intent, let alone ability, to deliver on such 'commitments' as they contain. However, we want to do more than point out the many deficiencies that need to be fixed. We focus in this section on recommendations relating to our principal concern to ensure the mitigation of the worst excesses of the 'high-rise hell' currently planned for Staines. The Appendices to this paper also set out a number of important areas of specific concern and recommended changes or clarifications needed to make the Local Plan sound.

**Question 6:** You can upload any modifications below.

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<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618937/PDF/-/RR%5FS%5FC%20LOCAL%20PLAN%20RESPONSE%20full%2020%2009%2022%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

Representations Made Under Regulation 20  
in Representor Order

<b>Respondent: Mr Nigel Rowe (33516193)</b>
<b>Organisation: Riverside Residents (Staines) Coalition</b>

<b>Response ID: 1121184</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
May need to produce summary for Evidence Base. See attached document from page 41 onwards. This paper sets out the general design principles as defined in the latest government guidance documents and how these could be applied to Staines-Upon-Thames. The expectation is that this will encourage greater engagement and collaboration between Spelthorne Borough Council, the local community and residents' groups, particularly on planning decisions. The content largely consists of extracts from the latest 'National Design Guide' and the 'National Model Design Codes' produced by the Ministry of Housing, Communities and Local Government (now Department for Levelling Up, Housing and Communities). Recommendations for how these might apply to Staines-Upon-Thames are in blue text. Introduction

“Places affect us all – they are where we live, work and spend our leisure time. Well-designed places influence the quality of our experience as we spend time in them and move around them. We enjoy them, as occupants or users but also as passers-by and visitors”.

The need for clear local Design Codes as part of a suite of documents sitting under a Local Masterplan, supported by the ‘National Design Guide’ and ‘National Model Design Code’ is essential if we are to enshrine principles of good design and give local authorities, developers and community groups a checklist against which all new developments can be measured.

At a time when Staines-Upon-Thames is facing the prospect of an almost 50% increase in its current population of 20,000 and significant new development to accommodate this uplift, we need confidence that the town will not be negatively impacted with inappropriate, unattractive, and uncoordinated high-rise blocks. This is particularly important when we consider the town has many positive opportunities to offer but still featured in a 2022 survey of the ‘50 worst places to live in England’. It is essential that the local authority has a strong focus to promote good design in the development and growth of the town by way of clear Design Codes and that it works in partnership with developers, local communities and residents groups to facilitate good design and foster a positive, proactive approach to planning.

Spelthorne Borough Council should be sending a clear signal to developers on the importance we attach to design issues. The most successful towns and cities showcase high quality design and we in turn should be striving for award winning architecture to promote the town’s strengths and positive attributes. Good design and great architecture can and should lift the spirits and improve the quality of life of our citizens. We should recognise the need for high density housing but this must be delivered in an intelligent and attractive way not through uninspiring and out of character tower blocks. In short, we need to be sure that our urban design vision is a lasting one, and not a ‘here today, gone tomorrow’ designer’s whim.

Staines-Upon-Thames has an important and unique heritage. There has been a market here for over 800 years, since before the signing of the ‘Magna Carta’ and the earliest known major crossings of the Thames by the Romans were at London Bridge and Staines Bridge. Staines-Upon-Thames is still a bustling market town today and retains many of its heritage assets.

Staines-Upon-Thames must aspire to be an attractive and modern town, which retains its historic market town identity and its attractive Thames riverfront setting. A place where people are proud to live, work and visit. Striving for better design which inspires and can be cherished, creating memorable places where a vibrant community can thrive and prosper.

#### Design Principles

This discussion paper sets out some of the basic principles held within the National Design Guide and seeks to ensure high quality design in the development of Staines-Upon-Thames’. It is aimed at developers, Councillors, Council officers, and all those involved in the development in the town, together with residents and other interested parties.

In addition to the ‘components’ of good design such as layout, form, scale, appearance, landscape, materials and detailing, the National Design Guide refers to ‘ten characteristics’ which contribute to well-designed places. Spelthorne Borough Council should have a clear statement on what makes Staines-Upon-Thames special and the design standards expected for each of these characteristics.

Well-designed places and buildings come about when there is a clearly expressed 'story' for the design concept and how it has evolved into a design proposal. This should explain how the concept influences the layout, form, appearance and details of a proposed development. It may draw its inspiration from the site, its surroundings or wider context.

The 'ten characteristics' summarised below are government priorities but they recognise these should be supported with more specific guidance in the form of a Local Plan, a Development Plan, Design Policies and Design Codes that set out a baseline understanding of the local context and an analysis of the local character and identity. This may include (but is not limited to) the contribution made by:

- the relationship between the natural environment and built development;
- the typical patterns of built form that contribute positively to local character;
- the street pattern, their proportions and landscape features;
- the proportions of buildings framing spaces and streets;
- the local vernacular, architecture and features that contribute to local character.

Introducing the ten characteristics

Well-designed places have individual characteristics which work together to create its physical character. The ten characteristics help to nurture and sustain a sense of community. They work to positively address environmental issues affecting climate. They all contribute towards the cross-cutting themes for good design set out in the National Planning Policy Framework

Character 1. Context

Context is the location of the development and the attributes of its immediate, local and regional surroundings.

Having an understanding of the context, history and the cultural characteristics of a site, neighbourhood and region influences the location, siting and design of new developments. It means they are well grounded in their locality and more likely to be acceptable to existing communities.

Character 2. Identity

The identity or character of a place comes from the way that buildings, streets and spaces, landscape and infrastructure combine together and how people experience them. Local character makes places distinctive. Well-designed, sustainable places with a strong identity give a sense of pride, helping to create and sustain communities and neighbourhoods.

Character 3. Built Form

Built Form is the three-dimensional pattern or arrangement of development blocks, streets, buildings and open spaces. It is the interrelationship between all these elements that creates an attractive place to live, work and visit, rather than their individual characteristics. Together they create the built environment and contribute to its character and sense of place.

Character 4. Movement

Patterns of movement for people are integral to well-designed places. They include walking and cycling, access to facilities, employment and servicing, parking and the convenience of public transport. They contribute to making high quality places for people to enjoy. They also form a crucial component of urban character. Their success is measured by how they contribute to the quality and character of the place, not only how well they function.

#### Character 5. Nature

Nature contributes to the quality of a place, and to people's quality of life, and it is a critical component of well-designed places. Natural features are integrated into well-designed development. They include natural and designed landscapes, high quality public open spaces, street trees, and other trees, grass, planting and water.

#### Character 6. Public Spaces

The quality of the spaces between buildings is as important as the buildings themselves. Public spaces are streets, squares, and other spaces that are open to all. They are the setting for most movement. The design of a public space encompasses its siting and integration into the wider network of routes as well as its various elements.

#### Character 7. Uses

Sustainable places include a mix of uses that support everyday activities, including to live, work and play.

#### Character 8. Homes and buildings

Well-designed homes and buildings are functional, accessible and sustainable. They provide internal environments and associated external spaces that support the health and well-being of their users and all who experience them.

#### Character 9. Resources

Well-designed places and buildings conserve natural resources including land, water, energy and materials. Their design responds to the impacts of climate change by being energy efficient and minimising carbon emissions to meet net zero by 2050. It identifies measures to achieve mitigation, primarily by reducing greenhouse gas emissions and minimising embodied energy; and adaptation to anticipated events, such as rising temperatures and the increasing risk of flooding.

#### Character 10. Lifespan

Well-designed places sustain their beauty over the long term. They add to the quality of life of their users and as a result, people are more likely to care for them over their lifespan. They have an emphasis on quality and simplicity.

#### Conclusion

The national guidance is clear about the need for a set of comprehensive design documents, building on a Local Plan and/or Development Framework supported by a local Design Guide and detailed Design Codes. These will provide clear guidance for all designers to work to and a transparent benchmark for all planning applications to be tested against, ensuring the positive development of the town going forward.

Good design is important for sustainable development in Staines-Upon-Thames, where we have an opportunity to create better places in which to live and work whilst ensuring development is acceptable to communities.



So too is effective engagement with and between applicants, communities, local planning authorities and other interests throughout the process. There must be an urgent focus to promote good design in the development and growth of Staines-Upon-Thames. Spelthorne Borough Council should be providing guidance, by way of its Local Plan, as well as a local Design Guide and detailed local Design Codes. These plans should set out a clear design ambition and expectation, so that developers have as much certainty as possible about what is likely to be acceptable and communities have confidence that good design is at the heart of all development. It is essential to work in partnership with developers and local communities to facilitate good design and foster a positive and proactive approach to planning. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. The long standing, fundamental principles for good design are that it is: fit for purpose; durable; and brings delight. It is relatively straightforward to define and assess these qualities for a building. Good design is not subjective, it is measurable. People recognise and respect good design, even when it may not align with personal tastes and preferences. The planning system provides the means to encourage good design, not just in conservation areas and other attractive places, but everywhere. The appearance of proposed development and its relationship to its surroundings are relevant to the consideration of a planning application and local planning authorities should refuse development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it Please see attached document for in depth response.

**Question 6:** You can upload any modifications below.

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<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618938/PDF/-/RR%5FS%5FC%20LOCAL%20PLAN%20RESPONSE%20full%2020%2009%2022%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Nigel Rowe (33516193)</b>
<b>Organisation: Riverside Residents (Staines) Coalition</b>

<b>Response ID: 1126220</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>I believe the Local Plan:</p> <p><input checked="" type="checkbox"/> is not sustainable</p> <p><input checked="" type="checkbox"/> is driven by a top-down housing target which does not take into account local circumstances</p> <p><input checked="" type="checkbox"/> is not proportionate, either for the borough as a whole or for Staines in particular</p> <p>The Local Plan 2022-2037 does not comply with the presumption of sustainable development as defined by national policy. Furthermore, it does not pursue the three overarching objectives of the planning system (economic, social and environmental) in an equally balanced or mutually supportive way.</p> <p>NOT CONSISTENT WITH NATIONAL POLICY</p> <p>The Local Plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework. The Foreword of the Local Plan (2 pages as signed by Cllrs Boughtflower / Beardsmore / Harvey) is damning and demonstrates that the Local Plan is not based on the principles of sustainable development. Quotes as follows:</p>	

“Forget the semantics that it is a ‘housing need’ figure; it is for all practical purposes a rigid target. Every statement by an MP that it is not mandatory looks increasingly vacuous as authority after authority has seen their plan fail at the housing number hurdle.”

“No Spelthorne councillor wants to build on our Green Belt, nor do we want to populate our town centres with sterile, high-rise blocks. But that is what Westminster is demanding.”

“618 homes per year, compared to the target of 166 in our Core Strategy from 2009, represents an increase that will damage our environment and ruin the character of our small and highly constrained borough.”

Furthermore, in Footnote 10 to Table 1 on p.20 of the Pre-Submission version of the Local Plan, the Council define housing need as an “unconstrained assessment of the number of homes needed”. Ministers have repeatedly said that the OAN is a starting point. 15

In addition, national policy does NOT require meeting the government’s calculation of objectively assessed need where it is impractical and inconsistent with achieving sustainable development. Local Plan Policy ST1 leaves out where it might be inconsistent with achieving sustainable development which is discussed in paragraph 11, NPPF (July 2021).

Given the extent of Green Belt in the Borough, the strategic value of which is largely undisputed, that in itself provides a very strong reason for restricting the overall scale of development in the plan area. This is especially the case as in Spelthorne there are no areas classified as anything other than Green Belt (65%) or Urban (35%). Even when considering the absolute physical constraints of the borough, e.g. areas under water or at serious risk of flooding, that too provides a cast-iron reason for constraining the overall scale of development.

By adopting the ‘unconstrained’ objectively assessed need (as calculated by the government’s standard methodology) as Spelthorne’s housing target, the Council may be meeting the economic and to some degree social needs of the present BUT is compromising the ability of future generations to meet their own needs – the overriding requirement of sustainable development as per paragraph 7, NPPF (July 2021):

“At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.”

NOT EFFECTIVE

The Local Plan should be deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.

There is no credible Infrastructure Delivery Plan (IDP) to ensure that the Local Plan can be deliverable and live up to its claims on the necessary infrastructure being forthcoming.

The Council claim that they are reliant on other stakeholders for much of the information which they are still waiting on. This demonstrates that there has not been effective joint working on cross-boundary strategic matters such as the provision of education, health and transport – many questions remain unanswered and have been deferred rather than dealt with:

- There are many gaps and out of date figures in the IDP e.g. on Early Years provision, key transport infrastructure schemes such as Staines Bridge and public transport; and

•Spelthorne’s Local Cycling and Walking Infrastructure Plan (upon which much of the sustainable transport plans are based) was only published a few days before the Environment & Sustainability Committee meeting on 6<sup>th</sup> September 2022 and hence is outside the scope of this review as there wasn’t enough time for it to be properly evaluated – as a member of the LCWIP stakeholder group however I understood that much of it was aspirational, had not been fully costed and funding streams had not been identified as part of the plan.

NOT JUSTIFIED

The Local Plan should be an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.

Paragraph 8 of the NPPF (July 2021) states:

“Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways...”

These are economic, social and environmental but there is a clear imbalance in the Local Plan which does not yet have an appropriate strategy for pursuing its environmental objectives. The current evidence base does not demonstrate how the Pre-Submission Local Plan will improve biodiversity, use natural resources prudently, mitigate and adapt to climate change, including moving to a low carbon economy.

FYI The Habitats Regulations Assessment (HRA) was only published on 17<sup>th</sup> August 2022, relates primarily to the Southwest London Water Bodies SPA and needs further work. The Council only published their Climate Change Action Plan (CCAP) a few days before the Environment & Sustainability Committee meeting on 6<sup>th</sup> September 2022 and hence is outside the scope of this review as there wasn’t enough time for it to be properly evaluated. There is still no current Biodiversity Action Plan (BAP).

Spelthorne’s first BAP was written in 2008 and is referenced in the SA/SEA Scoping Report Update 2022 but no new BAP has been published and the two references to Spelthorne’s BAP as “Key Evidence” in the Pre-Submission version approved by the Council on 19<sup>th</sup> May 2022 do not appear in the Regulation 19 Pre-Submission version of the Local Plan published less than a month later on 15<sup>th</sup> June 2022.

As mentioned above, Spelthorne’s HRA was only published on 17<sup>th</sup> August 2022, over 2 months into the launch of the Reg 19 Consultation on 15<sup>th</sup> June 2022 and appeared to be the main reasons for the extension of the Reg 19 Consultation period from 5<sup>th</sup> September to the 19<sup>th</sup> September. In an email from SBC on 19<sup>th</sup> May 2022 to all Members, it was inferred that all evidence WOULD be published for the start of the consultation in June.

Furthermore, the Council belatedly commissioned Sustainability Advice at the E&S Committee meeting on 10<sup>th</sup> May 2022:

“to develop Supplementary Planning Guidance Documents which support the Local Plan but without affecting the viability of the emerging plan”

Its laudable that it is finally being done but Sustainability Advice surely should be at the heart of the Local Plan, not written after the fact - the obvious option to at least wait until it had been completed before moving to Regulation 19 was not deemed necessary.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

TO MAKE THE LOCAL PLAN CONSISTENT WITH NATIONAL POLICY

Add a new “part 1)” to ST1 which reflects the plan-making part of NPPF para 11 and adjust the housing target to reflect local supply-side constraints. 17

As it stands, it just appears that the Plan is MAXIMISING the density of development, rather than OPTIMISING the density of development which is the stated aim of Policy ST2, Part 4).

The local housing need has been calculated by taking the official housing projections and uplifting it to take account of local affordability. Significant local supply-side constraints indicate, however, that this unconstrained need is disproportionate to the land available and cannot be delivered sustainably. Therefore, to comply with national policy the overall scale of development should be restricted by adjusting the borough's objectively assessed need (OAN) of 618 dwellings per annum (dpa) to factor in the major local supply-side constraints.

Ideally this should reflect the whole of Spelthorne's Green Belt (approximately 65% of the borough), an adjustment which could incorporate most, if not all, other supply-side constraints but, AT THE VERY LEAST, it should take account of the significant area which is unsuitable for residential development due to it being subject to one or more of the borough's absolute PHYSICAL constraints (e.g., but not limited to, water and functional floodplain, i.e. Flood Zone 3b) - a combined total of these constraints is estimated to be at least 30% of the borough.

It is accepted that there is an acute need for housing for local people and their families now and in the future and some densification is inevitable to accommodate their needs and economic progress. The OAN has, however, already been uplifted as part of the government's standard methodology to take account of local affordability. It is therefore recommended that the mid-point of the 30-65% range is taken, i.e. a reduction of approximately 50%, and it is applied before the final step of the standard methodology. This would be considered a reasonable compromise and accommodate densification where practical and where local services allow (or can be delivered to support it).

Restricting the overall scale of development by 50% would have the effect on the 2022 calculation of reducing 650 dpa (from Step 2 of the government calculation) to 325 dpa. Overall, at 325 dpa, this would still be DOUBLE the level of development in the last local plan (166 dpa). This would enable the local planning system to more equally balance the three overarching objectives set out in the national guidance and address social progress, economic well-being AND environmental protection:

☑It would be much more deliverable than a target of (nearly) twice that number.

☑It would enable the development of more family homes rather than largely 1 and 2 bed flats.

☑It would greatly improve the opportunities for reducing emissions and pollution.

Hence, a target of 325 dpa would still help meet the needs of current and future residents but also more effectively align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.

#### TO MAKE THE LOCAL PLAN EFFECTIVE

A lot more work needs to be done with strategic partners on the Infrastructure Delivery Plan (IDP) to ensure that the Local Plan can be deliverable and live up to its claims on the necessary infrastructure being forthcoming. 18

A clear and complete IDP gap analysis needs to be provided on the latest evidence, not evidence which is in part over 5 years old. For example, the Surrey Highways Forward Programme\* of schemes totalling £67m quoted in the June 2022 IDP was last updated in November 2018, includes no rail schemes,

hardly any bus schemes and £25m (in 2016 prices) of the £67m relates to an old, once-upon-a-time much-vaunted scheme for Staines Bridge Capacity Improvements which appears to have fallen by the wayside.

\*[https://www.surreycc.gov.uk/\\_\\_data/assets/pdf\\_file/0017/190232/Published-Spelthorne-Forward-Programme-2018\\_p1.pdf](https://www.surreycc.gov.uk/__data/assets/pdf_file/0017/190232/Published-Spelthorne-Forward-Programme-2018_p1.pdf)

It should be noted that the IDP was only published for the first time in April 2022 (and was subsequently updated in June 2022). The Regulation 19 stage is therefore the first chance the public have had the opportunity to comment on it.

TO ENSURE THE LOCAL PLAN CAN BE JUSTIFIED

Throughout the Local Plan process, the Council have not considered “reasonable alternatives”, instead presenting impossible choices or the unreasonable alternative of doing nothing. This needs to change.

Members of the Council (and other stakeholders) need to be presented with an appropriate strategy taking into account REALISTIC alternatives where the Evidence Base is complete, up-to-date, balanced and is not purely seeking to fit the narrative and preconceived ideas.

For whatever reason, the Council have been forced, pretty much since the Strategic Housing Market Assessment of 2015, to do whatever it takes to plan for the unachievable, a fourfold increase in housing delivery in the borough without the resources to sustain even the current rate of growth – this is a strategy which will blight the borough of Spelthorne and our main town of Staines-upon-Thames for decades to come, damaging our environment and ruining the character of our small and highly constrained borough which we like to call home.

**Question 6:** You can upload any modifications below.

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<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618939/PDF/->

[/RR%5FS%5FC%20LOCAL%20PLAN%20RESPONSE%20full%2020%2009%2022%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618939/PDF/-/RR%5FS%5FC%20LOCAL%20PLAN%20RESPONSE%20full%2020%2009%2022%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Nigel Rowe (33516193)</b>
<b>Organisation: Riverside Residents (Staines) Coalition</b>

<b>Response ID: 1120834</b>
<b>Policy / Evidence Base / Part of Plan: Policy PS1: Responding to the climate emergency</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not consistent with national policy
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
<p>It's good to see this policy but it doesn't go far or fast enough. It can be seen that other policies tackle climate change too but PS1 only talks about development. Given the name, the scope of this policy is too limited. The policy should be renamed (e.g. 'Sustainable design and construction' / 'Climate change and sustainable construction') or, ideally, the policy expanded.</p> <p>This policy has to last notionally for 15 years and is at risk from being rapidly overtaken by events which will make at least some of it redundant. It should be as up-to-date as possible and stretching requirements where feasible, in anticipation of further legislation coming down the tracks.</p> <p>Paragraph 11 of the NPPF (July 2021) states that plans should apply a presumption in favour of sustainable development.</p> <p>"For plan-making this means that:</p> <p>a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;</p> <p>b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas unless:</p>

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area<sup>7</sup>; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

The draft Local Plan recognises that the local authority has declared a climate emergency and it states that all development must respond to the climate emergency. 20

However, the measures proposed in the plan do not constitute an appropriate response to an emergency and are more akin to rearranging deck chairs on the Titanic.

As with other aspects of the plan the approach seems to have been to decide the plan and then to seek to find ways to justify what is proposed.

‘Sustainable development’ as defined in the NPPF requires that the LPA takes account of climate change and improves the environment.

It is widely accepted that there is a problem with the planning guidance failing to keep up with the increasing Government recognition of the threats posed by climate change. However, the direction can be seen in para 153 of the NPPF:

“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.”

We consider ‘mitigating’ as measures to reducing carbon emissions and ‘adapting’ as building in resilience through measures such as not building in areas at risk of flooding, reducing our dependence on dwindling resources and switching to sustainable transport. This approach is also reflected in many other documents, including the Government’s response to the latest report from the Climate Change Commission that promises a National Adaptation Programme linked here - [Government response to the Climate Change Committee \(publishing.service.gov.uk\)](#).

Recognising that there are two distinct ways in which plans should respond to the climate emergency:

- Plans that will lead to significant reductions in emissions.
- Plans that will help to protect people from the now inevitable impacts of climate change.

Plans that will lead to significant reductions in emissions

When looking to reduce emissions the plan should recognise the huge environmental impact of demolishing and rebuilding, as opposed to re-purposing existing buildings. The good intentions outlined in para 4.4 of the Local Plan (under ‘Responding to the climate emergency’ on p.23) are just intentions and as it stands the plan does not include the measures that would be necessary to ensure that developments are aligned with the progress towards becoming carbon neutral.



Royal Institute of British Architects (RIBA) states that the embodied emissions for a new build residential block can represent as much as 51% of the total carbon emissions for the building throughout its theoretical 60-year lifespan. The RTPI, whose 2018 report is referenced in the draft plan under Key Evidence have also raised the issue of embodied carbon in their blog dated 4 Oct 2019 entitled RTPI | Embodied carbon can't be ignored.

Whatever the further measures that may be introduced by the council, the proposals included in the draft plan will result in a significant increase of carbon emissions in Spelthorne as a result of the huge amounts of concrete and steel implicit in the proposals.

A clear statement in the plan that repurposing existing buildings should take precedence over demolition and rebuild would help in this regard (see Issue 2 below).

In view of this the Sustainability Appraisal Indicator for climate change on page 27 of the draft plan showing as ++ is clearly not sound as it stands.

Plans that will help to protect people from the now inevitable impacts of climate change

When looking at how we can protect people from the impacts of climate change a primary goal should be to avoid creating new homes in areas that are increasingly susceptible to flooding.

Current guidance for individual planning applications states that new housing should not be built in areas liable to flooding. The draft plan includes a strategic decision to both accept the allocated housing number without regard to the specific constraints in Spelthorne, such as high levels of flood risk, and then proposes to build the majority of these new homes in the town in the borough which is at the highest risk of fluvial flooding (per the Level 1 SFRA).

Clearly this is at odds with the guidance and is discussed further under E3 'Managing Flood Risk'.

Taken overall, we believe plans are inconsistent with para 152 of the NPPF and are therefore unsound:

"The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure."

As they stand (and over and above not taking full account of flood risk), plans do not contribute to radical reductions in greenhouse gas emissions, do not minimise vulnerability and improve resilience, and do not do enough to encourage the conversion of existing buildings.

ISSUES WITH POLICY PS1

1. Location and accessibility

Part 1 of the policy has no substance

If the Council is serious about sustainable travel and accessibility, it needs to ensure the policy is in line with latest government guidance e.g. currently its Gear Change document and LTN 1/20 for the provision of cycling and walking infrastructure\* (including access across developments).

\*<https://www.gov.uk/government/publications/cycling-and-walking-plan-for-england>

The Council should ensure developments are accessible to all including those with reduced mobility by including sufficient pick up/drop off space (& still ensuring there is sufficient blue badge parking in an accessible location).

Given the expectation of shopping moving increasingly online, sufficient access should be ensured for delivery vans so that they don't block the roads by parking inappropriately.

The Council should also ensure large developments make adequate allowance for sustainable transport improvements in the future e.g. space for bus stops off the main highway and potentially bus turning circles for developments over a certain size; setting new development back to allow for public realm with more permeable surfaces, soft landscaping and sufficient expansion of cycling and walking routes.

Part 1c) Providing more walkable and cyclable neighbourhoods (Twenty Minute Neighbourhoods) that reduce demand for the use of private vehicles

The decision to focus on Staines as the site for the majority of new housing actually works against this objective. This is because people living in other parts of the borough will need to travel to Staines for many of the services that they require (e.g. proposed new health and wellbeing hub and the new Spelthorne Leisure Centre) and vice versa (many schools are the other end of the borough as will be the proposed new sixth form).

Notwithstanding our belief that the housing target is too high and unsustainable overall, a more proportionate expansion of housing closer to the other town centres, along with the development of retail and other services would be much more likely to achieve the aim of a twenty-minute neighbourhood.

See for example the discussion by the Town and Country Planning Association webinar on Twenty Minute Neighbourhoods -

<https://tcpa.org.uk/collection/the-20-minute-neighbourhood/>.

Part 3d) Incorporate measures for the secure storage of cycles and storage of waste including recyclable waste

In a similar way to car parking standards, the council should introduce sustainable travel standards to be applied to new developments\*. It is no longer enough to simply say provision of secure bike storage for example as in Part 3d).

\* We see that this is in fact referenced under Policy ID2, Part 1c). Should these be cross-referenced or is one redundant? How will these 'opportunities' be enforced and measured as the Monitoring Indicators are loose and the targets weak?

We have not seen the latest Parking SPD. However, if cutting car parking by half for example, you should at least double the bike storage requirement as 1 bike, and even 2 bikes, per unit is not sufficient for families. Cutting car parking shouldn't just be seen as a way for freeing up more space to cram more people (or units) in.

Furthermore, Policy ID2 'Sustainable Transport' proposals seem to be linked entirely to new developments, rather than taking the opportunity to develop a very clear plan for developing active and sustainable travel around the borough. Once again, the plan scores this positively for climate change on the Sustainability Appraisal Indicators, but it is not at all clear how this positive outcome is to be achieved\*.

\*The Local Cycling and Walking Infrastructure Plan for Spelthorne mentioned under ID2 Part 3) was only made public shortly before the Environment & Sustainability Committee meeting on 6<sup>th</sup> September 2022 and due to its late publication was necessarily outside the scope of our review.

2. Sustainable design and construction - best practice

Policy PS1 quotes, as Key Evidence, the New Homes Policy Playbook from the UK GBC and takes in SOME of its minimum recommendations. The UK GBC believes that there is much that local authorities can legally do to help speed up the journey towards net zero carbon new homes and they have developed a number of recommendations about the requirements they believe local authorities can introduce to drive sustainable new homes in their area. The UK GBC has provided a set of minimum requirements which they say Local Authorities can and should introduce now, as well as a number of stretching requirements for those Local Authorities with a greater level of ambition\*\*.

\*\* UK GBC New Homes Policy Playbook 2021 – Summary of recommendations for local authorities Part 1 - Advancing Net Zero – reducing energy demand and carbon emissions - <https://ukgbc.s3.eu-west-2.amazonaws.com/wp-content/uploads/2021/01/05144256/210113-New-Homes-Policy-Playbook-Summary.pdf>

### 3. Monitoring Indicators

Policy PS1 only references two monitoring indicators. This is inconsistent with the Sustainability Appraisal published for Regulation 19.

NB The SA (for Objective 11 'Climate Change' on p.86) also states that one effect to be monitored is "New and retrofitted development and infrastructure location and design is future proofed against the future impact of climate change". There is no Monitoring Indicator listed against this effect.

### CONCLUSION

The Local Plan seeks to justify building over 9,000 new homes on low-lying ground in the borough and over half of these in the 3 Staines wards, despite Staines being the town with the greatest risk from fluvial flooding (by the Council's own admission).

In the preamble to Policy PS1, Section 4.2 states that the "Local Plan will help to support the transition to a low carbon future, helping to address the climate emergency, taking account of flood risk."

However, building over 9,000 new homes without considering Embodied or Lifetime Carbon is inconsistent with actually achieving a zero-carbon future any time soon even if 'notionally' balancing carbon emissions. Neither does it take proper account of flood risk.

In its current form, the Plan is simply not sustainable. Any benefits from the measures in Policy PS1 will be dwarfed and massively outweighed by the true environmental costs.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

- Part 1b) – add at end "taking account of flood risk"
- Part 1c) – add at end "in accordance with the latest guidance"
- Part 3d) – add at end "in accordance with the latest guidance"

MODIFICATION: This policy should:

Reflect ALL of the UK GBC recommended minimum requirements in line with SBC's net zero commitment and acknowledgement that "the buildings we build today are likely to be with us into the next century" AND encourage adoption of the stretching requirements in the following areas:

- reducing energy demand

- reducing embodied carbon
- measuring in-use performance
- supplying low carbon energy
- addressing residual emissions for a zero-carbon balance

This policy (or somewhere in the plan) should:

a) Reflect ALL the Monitoring Indicators for SA Objective 11 'Climate Change' (as per p.86 of the June 2022 Reg 19 Sustainability Appraisal)

- CO2 Emissions (total and per capita).
- Number of commercial premises built to BREEAM 'Very good' or better.
- Installed renewable/low carbon energy capacity (MW/h).
- Amount of demolition waste reused or recycled per annum (tonnes).
- Megawatts of installed small scale low and zero carbon energy
- Number of new dwellings complying with higher water efficiency standard capacity

b) Design and include a monitoring indicator to monitor the effect listed under SA Objective 11 'Climate Change' - "New and retrofitted development and infrastructure location and design is future proofed against the future impact of climate change"

Minor modifications

There are lots of small errors throughout the Local Plan which require correction including in Policy PS1.

MINOR MODIFICATIONS (in PS1)

- Possible missing words at end of 2<sup>nd</sup> sentence (section 4.2)
- Date correction (section 4.10): Spelthorne Borough Council declared a climate emergency in October 2020

**Question 6:** You can upload any modifications below.

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<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618951/PDF/-/RR%5FS%5FC%20LOCAL%20PLAN%20RESPONSE%20full%2020%2009%2022%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Nigel Rowe (33516193)</b>
<b>Organisation: Riverside Residents (Staines) Coalition</b>

<b>Response ID: 1120842</b>	
<b>Policy / Evidence Base / Part of Plan: Policy PS3: Heritage, Conservation and Landscape</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not consistent with national policy	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>1.The Council will seek to preserve, conserve and enhance asappropriate the architectural, historic and landscape character of theBorough. The Council will also expect all new development proposalsto make a positive contribution to the environment taking account of any relevant design codes.</p> <p>Heritage</p> <p>2.Proposals for development which may affect any heritageasset (designated or undesignated &amp; including listed buildings) willbe required to demonstrate, through the submission of appropriateappraisals and investigations and in a Design and Access Statement,that the asset and its setting will be conserved and enhanced.</p> <p>3.The Council will support appropriate development whichseeks to maintain, sustain and enhance the significance and specialarchitectural and historic interest of Listed Buildings in the Borough.</p> <p>4.Considerable weight will be given to the protection of a listedbuilding and its setting. Development of a listed building, ordevelopment within the curtilage or within the vicinity of a listedbuilding or structure, should conserve and/or enhance its setting andany features of special architectural or historical interest which itpossesses</p>	

5. Proposals for extensions and or alterations to heritage assets must demonstrate that the development will respect the historic form, setting, fabric and any other aspects that contribute to the significance of the host building. Any features of architectural or historic interest should be retained in situ and repaired rather than replaced wherever possible.

6. The Council will keep under review all non-designated assets identified as being of local importance or distinctiveness and will, as necessary, identify new assets which contribute to the local character or distinctiveness of the area.

#### Conservation Areas

11. The Council will continue to conserve and enhance the character and setting of the existing conservation areas, as shown on the Policies Map. The Council will require proposals for new development to demonstrate that they will make a positive contribution to the setting and local character of the conservation area Landscape

13. The Council will seek that new development respects the existing landscape character, avoids harm, and provides for the positive enhancement of the landscape by the design, scale and setting of any new building. Reference should be made to the most up-to-date Landscape Character Assessment or equivalent.

14. Development which would have a significant detrimental effect on the landscape setting of the Borough will only be permitted where it can be demonstrated that the harm is outweighed by substantial public benefits or other benefits that outweigh the harm to or loss of the landscape setting.

There is much to admire in draft Policy PS3 but there are grave concerns about:

- Inconsistencies between it and other parts of the draft Plan
- The importance of views of Heritage assets in the Staines context. Inconsistencies
- Bridge St Car Park development – Allocation ST4/002.

This allocation envisages the construction of a hotel tower of not less than 12 storeys and residential blocks of significant height and mass. The council, which owns the site, has already entered into an agreement for that development. The whole site is at the heart of the Staines Conservation Area, occupies a significant stretch of Thames river frontage, adjoins a grade II listed structure and has a major impact on views of heritage assets in the Area. This allocation (and the development agreement) are clearly inconsistent with paras 1,2,3,4,11 and 13 of PS3.

- Debenhams site – Allocation ST4/019. This site is now within the SCA and the Debenhams building itself has been listed. The allocation envisages the construction of 150 residential dwellings, which it is thought will be significantly higher and of greater mass than the existing building. This allocation is likely to be inconsistent with paras 1,2,3,4,5 and 11 of PS3.
- The Oast House – Allocation ST3/004. The Oast House is a grade II listed building and it is part of a site on which a multi-storey residential development and health centre is planned. The site-specific requirements of the allocation include “Conserve and, where possible, enhance heritage assets and their setting, most notably the...listed Oast House on site.” This is inconsistent with paras 2,3,4 and 5 of PS3.
- Riverside Car Park – Allocation ST4/010. The site of this allocation, providing for the construction of 35 residential units, falls wholly within the recently extended Staines Conservation Area. The recently adopted SCA Appraisal explains the site’s inclusion as “...because of the importance that this high

quality open space has within the character area and also as one of the few public, open spaces from where a full appreciation of the river Thames and its relationship to Staines town can be obtained.” This allocation is completely inconsistent with paras 1,11 and 13 of PS3. •Communications House – Allocation ST4/026. This site,for which a residential multi-storey tower block is planned, liesno more than 30m from the boundary of the SCA and lessthan 60m from the River Thames. Its height and mass willhave a negative impact on the character and setting of theconservation area and on the riverscape and is inconsistentwith paras 11 and 13 of PS3.

•Thameside House – Allocation ST1/037. This council-owned site, for which a residential multi-storey tower block isplanned lies less than 30m from the River Thames. It will havea negative impact on the landscape views of this area whetherfrom the river (because of the river’s curve it will be highlyvisible for a mile or so of the river) or from the town (wheremany existing houses will be overshadowed by its height andmass). Inconsistent with paras 11 and 13 of PS3.

Views of Heritage Assets and Landscape (including Townscape and Riverscape)

Much of the character of Staines is derived from the views, sightlines and visual permeability within its central area. The Conservation Area appraisal refers frequently to the views of and from heritage and non-heritage assets and includes in its Management Plan section the instruction that “No new development should obstruct views of importance into, out of and within the Conservation Area”. The views of St Mary’s Church, the sightlines provided by the Georgian terrace in Clarence Street and the views and focal attraction of the Debenhams building are as important as the architectural and historic features of the buildings themselves.

More widely, the way in which new developments influence the views of whole areas (landscape, townscape or riverscape) is hugely important to a town of the scale and character of Staines.

Yet Policy PS3 pays little attention to this. Para 4 refers to development “within the vicinity” of listed buildings but it is questionable whether this would deal with the obstruction of views by more distant structures. Para 11 speaks of “conserving character and setting” of a conservation area which might just cover long views but is hardly a clear statement of intent. Para 13 requires that reference be made to the latest Landscape Character Assessment to assess whether new development respects existing landscape character but it has not been possible to see whether one of these has been produced for central Staines or the river area.

This weakness of reference to views and visual impact is confirmed by the Sustainability Monitoring Indicators where the Targets are limited to “no loss of heritage assets”.

NB: Overall, the Monitoring Indicators for PS3 are inconsistent with those of Objective 7 in the Sustainability Appraisal, namely “To conserve and enhance the historic environment, heritage assets and their settings”. In addition, the targets such as they are only seek to ‘maintain’ and do nothing to ‘enhance’.

This part of the Plan (PS3) is unsound on the grounds that it is not deliverable and is therefore inconsistent with national policy.

See attached for further rep.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Nigel Rowe (33516193)</b>	
<b>Organisation: Riverside Residents (Staines) Coalition</b>	
<b>Response ID: 1118045</b>	
<b>Policy / Evidence Base / Part of Plan: Policy SP1: Staines-upon-Thames</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
A substantially large representation has been submitted which includes several topics, processes, policy issues, local questionnaires and their findings from local residents, recommendations, photographs and charts. Please see attached document.	
<b>Question 6: You can upload any modifications below.</b>	
RR(S)C LOCAL PLAN RESPONSE full 20 09 22_Redacted.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618942/PDF/-/RR%5FS%5FC%20LOCAL%20PLAN%20RESPONSE%20full%2020%2009%2022%5FRedacted%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618942/PDF/-/RR%5FS%5FC%20LOCAL%20PLAN%20RESPONSE%20full%2020%2009%2022%5FRedacted%2Epdf</a>	

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Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Please also note that the authors of the attached formal response request to participate in the Inspector's examination (subject to time and availability when a date is confirmed)

<b>Respondent: Mr Nigel Rowe (33516193)</b>
<b>Organisation: Riverside Residents (Staines) Coalition</b>

<b>Response ID: 1120841</b>
<b>Policy / Evidence Base / Part of Plan: Policy SP1: Staines-upon-Thames</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not consistent with national policy
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
<p>Character</p> <p>6.The Staines Conservation Area (shown on the Policies Map) will be preserved and enhanced. New development in Staines is likely to be high density in suitable locations within the town centre to maximise efficient use of land but will be expected to achieve high quality design in accordance with the Framework. Proposals will be supported that protect and enhance the local character of the area.</p> <p>7.The Staines Development Framework sets out more sensitive character areas where height and density limits will apply to new buildings. Development proposals in the relevant zones will be expected to comply with these limits unless, in exceptional cases, there is robust justification for a deviation that weighs heavily in favour of granting permission. This could include a higher proportion of affordable housing than required by policy, exemplary design or significant benefits to the community.</p> <p>Staines Conservation Area (para 6)</p> <p>The SCA was first designated in 1975 and now covers a significant part of central Staines, extending from the riverside back to the High Street. At least two of the major development allocations fall within its boundary and others adjoin it and impact its setting.</p>

The SCA has recently (in 2022) been re-appraised and its recommendations and evaluations adopted by the Council as a Supplementary Planning Document (which can be viewed at [spelthorne.gov.uk](http://spelthorne.gov.uk))

Key features of the Area listed in the character appraisal are:

- Its location adjacent to the Thames on its southern boundary together with Church Island;
- The number of rivers, tributaries and channels which run throughout the Conservation Area creating boundaries, views and a number of riverside settings within a largely built-up environment;
- The high level of interconnection between spaces and visual permeability throughout the Conservation Area due to a plethora of glimpsed views and openings;
- The presence of a few pivotal, landmark buildings such as the listed buildings in Market Square, Brewery Tower, St Mary's Church etc...and the multiple views of these buildings due to extensive visual permeability within the Conservation Area;
- Important civic and commercial buildings including the Town Hall, Fire Engine Shed Staines West Station, War Memorial and Debenhams building etc. reflecting civic pride in the 19<sup>th</sup> and 20<sup>th</sup> centuries;
- There are several Coaching Inns throughout the area which, even where they are converted, are easily recognised and reflect the importance of Staines as a Coaching stop from the 18<sup>th</sup> century onwards;
- The high number of valuable trees and specimen trees, particularly in the St Mary's Church Character area, and along the Thames;
- The small-scale, village-like appearance and quiet character of St Mary's Church Character Area;
- By contrast the more built up, busier, grander and larger-scale historic development centred around the Market Square, High Street, Church Street and Clarence Road junctions.

It is notable that many of these features are defined by "the views of buildings" and the "visual permeability" of the SCA. It is difficult to see how the local character of the area will be protected and enhanced (as promised by paragraph 6 of SP1) when other parts of the draft Plan specifically provide for buildings which breach height/mass zoning and will impair the views and visual permeability of the Area.

Furthermore, the Management Plan of the SCA Appraisal requires that

"Staines Conservation Area has relatively low buildings, the majority of which are two, three or four storeys in height. Any new development should respect the heights of existing buildings in order to protect the Conservation Area"

Other parts of the draft Local Plan (notably the zoning arrangements and specific allocations) ignore this requirement.

This part of the Plan is therefore unsound on the grounds that it is not deliverable and consequently not in accordance with NPPF.

Zoning arrangements: extent of the zones and exemption provisions (para 7)

The zoning arrangements set out in the Staines Development Framework provide for height and density limits in the sensitive character areas. The height limits are, as a minimum, 5-6 storeys and the draft Plan provides for exemption from this restriction.

Insofar as the zoning falls within the SCA, these limits and exemptions are not consistent with either the Conservation Area policy or legislation. Several “zone-busting” schemes have also already been progressed. This part of the Plan is therefore unsound on the grounds that it is not deliverable and consequently not in accordance with NPPF.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

Modification to the Plan which might remedy this unsoundness should include allowing exemptions to the proposed zoning arrangements only if they do not harm the character of the area as defined by the SCA appraisal.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Nigel Rowe (33516193)</b>
<b>Organisation: Riverside Residents (Staines) Coalition</b>

<b>Response ID: 1125948</b>
<b>Policy / Evidence Base / Part of Plan: Policy SP1: Staines-upon-Thames</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
None of the illustrations in the Staines Development Framework or images on display panels used in the Council’s Elmsleigh Centre and High Street ‘consultations’ reflect the overwhelmingly intrusive scale of the planned high-rise developments. When the consultants were challenged on the uninspiring quality of building designs in the images, they simply said they were just illustrations and would be ‘upgraded’. 3.3.4 One of the troubling points of reference in relation to design standards is the brutalism of the Inland Homes (now Fairview New Homes) development, more 1970s East European than enlightened 2020s. Although members of the Planning Committee criticised much about this development including its design, Officers decided only to challenge the height of the building and parking ratio at the appeal. The equally utilitarian design of the proposed Debenhams site redevelopment was also, its developer claimed, the product of lengthy consultation with Council officers. There is little evidence yet of the Council taking seriously its claimed commitment to high standards of architecture and design. This is even the case with the developments for which it is wholly responsible. Nothing seems to have changed since an Officer confirmed at a Council meeting in the Spring this year that the Thameside House and Oast House developments must be “cash cows” (consistent with an earlier commitment that “maximising returns is the key focus” of these projects). None of this is encouraging and remains the source of considerable community anxiety and anger.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Nigel Rowe (33516193)</b>
<b>Organisation: Riverside Residents (Staines) Coalition</b>

<b>Response ID: 1120875</b>	
<b>Policy / Evidence Base / Part of Plan: Policy H1: Homes for All</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
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Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p><b>HOUSING DELIVERY</b></p> <p>Issues of specific concern that relate to the proposed overdevelopment of Staines with 55% of the borough's entire housing target are infrastructure provision and delivery, utilities, climate emergency and managing flood risk.</p> <p>Spelthorne Borough Council rejected out of hand from the outset suggestions from government sources, including Ministers and the local MP (now Chancellor of the Exchequer), that it should produce a Local Plan that it believed to be achievable and sustainable, that takes full account of the borough's significant natural constraints, and one that better reflects the borough's actual housing needs.</p> <p>Instead, the Council chose not even to try, and insisted that the government has demanded that it must meet an immutable target of 618 new homes every year (four times the demands of the extant Local Plan of 2009). It has accepted this, despite asserting (in the introduction to the Local Plan) that meeting it "will damage our environment and ruin the character of our small and highly constrained borough" and that "No Spelthorne Councillor wants to build on our Green Belt, nor do we want to populate our town centres with sterile high-rise blocks."</p>	



It is abundantly clear from reading the Local Plan that the Council has taken a 'top down' approach in attempting to shoe-horn a litre into a pint pot. It has sought to deliver an unrealistic housing target with no clear idea of whether, let alone how, it can be done. The only way it thought it might have a shot at this is to dump 55% of the borough's entire housing target on Staines; but it then discovered the only way to do that is to pepper the town with tower-blocks of tiny flats on almost every available brownfield site and give itself the freedom to do this even in sensitive areas (such as the riverfront and Conservation Area). However, Staines is perhaps the worst area in the borough for flood risk (Appendix 3, page 26) and some of the identified sites have already been declared 'non-viable' under all the scenarios explored and very unlikely to deliver the requisite percentages of affordable homes. Delivering the Plan would also violate many of the demands of the Climate Emergency (Appendix 2, page 20). Putting to one side that the full Council signed off the Local Plan in May when it was missing several critical supporting evidence documents, some of these (the latest delivered in mid-August) are still incomplete or in places simply fanciful aspirations. A clear example of this is the mission-critical Infrastructure Delivery Plan first issued with substantial gaps in April 2022 and still being updated in June (after the Council had approved the Local Plan for Reg 19 consultation).

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

The housing 'target' for Staines must be reduced. This could be achieved by agreement with the government for a lower number for the borough, or a more proportionate distribution across the borough of the currently so-called "agreed level of housing need". There should also be a clear commitment in the Local Plan and Staines Development Framework that the distribution of the "agreed level of housing need" across the borough, and particularly the allocation to Staines, is not fixed and may change over the plan period as and when circumstances and opportunities for variations arise.

**Question 6:** You can upload any modifications below.

RR(S)C LOCAL PLAN RESPONSE full 20 09 22\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618931/PDF/-/RR%5FS%5FC%20LOCAL%20PLAN%20RESPONSE%20full%2020%2009%2022%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Nigel Rowe (33516193)</b>
<b>Organisation: Riverside Residents (Staines) Coalition</b>

<b>Response ID: 1120840</b>	
<b>Policy / Evidence Base / Part of Plan: Policy E3: Managing Flood Risk</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: LEGAL COMPLIANCE We don't believe the local planning authority (LPA) has followed due process.
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: is unsound for the following reasons: not justified not effective not consistent with national policy
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Minor modifications (in Policy E3) There are lots of small errors throughout the Local Plan which require correction including in Policy E3. To make the Local Plan sound: 1.Cumulative Impacts & approach to flood risk management	

The Local Plan needs to review the overall level of proposed growth strategically and consider the degree to which flood risk should act as a constraint on development across Spelthorne overall and in Staines in particular.

The Local Plan needs to demonstrate in a transparent way how the Sequential Test has been applied to the Local Plan as a whole. 31

The Local Plan needs to provide evidence of how the cumulative impacts of adding over 9,000 new homes in the borough will be managed and provide reasoned justification in Policy E3. What is the view of Spelthorne's emergency planners?

At a minimum, the Local Plan needs to incorporate appropriate guidance on emergency flood risk plans for new development such as that published by ADEPT in conjunction with the EA.

#### 2. Safeguarding land

Policy E3 needs to clarify which other land should be safeguarded (over and above the area covered by the River Thames Scheme).

Key Evidence needs reviewing to ensure its sufficiently up-to-date and consistent with national policy – there are questions about some assumptions in the updated Level 1 and the Level 2 SFRA.

#### 3. Functional Floodplain exemptions

Clarification as to land status of Local Plan site allocations in FZ 3b proposed for redevelopment and the definition of Functional Floodplain i.e. Flood Zone 3b.

Incomplete scope of assessment (Level 2 SFRA, Section 1.4, p.3)

#### 4. The Level 2 SFRA site screening

Obvious gaps in evidence need closing – it does not appear the sequential test has been applied to all relevant allocations including the Communications House and Two Rivers site allocations in Staines.

#### 5. Rationale for not screening in other sites in Flood Zone 2 nor any sites in Flood Zone 1

Clarification is required as to whether the sequential test should be applied to all site allocations in Flood Zone 2 at the plan-making stage (and certain applications in Flood Zone 1). If not, confirmation is required that a site-specific FRA will still be required at the application stage.

Datasets (Level 2 SFRA, Section 2, p.5)

#### 6. Baseline modelling

The SFRA needs to provide clarification of its baseline modelling and confirm it is as up-to-date as it can be. Updated modelling for the River Colne should also be sought.

Furthermore, the Local Plan Policies Map and Interactive Map need updating to reflect the correct classification for Flood Zones 2 and 3b.

Inconsistencies within and between documents need reviewing - many will require only minor modifications, but some may require a major modification.

#### 7. Consistency between the Level 2 SFRA and Local Plan

Check if inclusion of site allocation ST1/030 for residential development is still appropriate and update where necessary. Fairways Day Centre is proposed for residential development (30 units) and ground floor community use in the Local Plan but this appears to be inconsistent with the recommendation in the Level 2 SFRA.

Check site boundaries for allocations ST4/009 'The Elmsleigh Centre' and ST1/037 'Thameside House' and update Level 2 SFRA findings and recommendations where necessary.

#### 8.Consistency within the Level 2 SFRA

The full range of constraints identified by the Level 2 SFRA should have been flagged in the Level 2 SFRA Summary as careful planning will be required to bring some of these sites forward too (as well as the sites where access is an issue).

#### 9.Minor modifications (in Policy E3)

Multiple small errors in Policy E3 need correcting – these are likely to require only minor modifications. These include the following:

- Policy E3 Part 2 – two typos
- Policy E3 Part 5f) – missing word “plans” after “evacuation”
- Key Evidence – Level 1 SFRA reference needs updating to 2022 and Level2 SFRA 2022 should probably be added
- Monitoring Indicators – two references to Policy E2 should read Policy E3

**Question 6:** You can upload any modifications below.

RR(S)C LOCAL PLAN RESPONSE full 20 09 22\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618941/PDF/-/RR%5FS%5FC%20LOCAL%20PLAN%20RESPONSE%20full%2020%2009%2022%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Ms Orianna Rosa Royle (40270977)</b>
<b>Organisation:</b>

<b>Response ID: 1123657</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Having read the Spelthorne Local Plan 2022-2037 I am really concerned about the sheer number of affordable homes and traveller sites, when the area already has the highest crime rate in the whole of Surrey. This will only further contribute to crime levels and devalue the area and my property.
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Ms Orianna Rosa Royle (40270977)</b>
<b>Organisation:</b>

<b>Response ID: 1126671</b>
<b>Policy / Evidence Base / Part of Plan: Policy SP7: Heathrow Airport</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Meanwhile, one of the benefits of living in Staines is its proximity to Heathrow Airport without being under a flight path. By supporting the expansion of the airport, including another runway, this would result in a huge increase in noise pollution making it comparable to less desirable areas like Cranford.
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Ms Orianna Rosa Royle (40270977)</b>	
<b>Organisation:</b>	
<b>Response ID: 1112311</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy EC3: Local Centres, Shopping Parades and Isolated Retail Units	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
It also seems that the increase in homes is at the expense of commercial spaces. In areas like the Frankie and Benny's site, it is set to be replaced with homes instead of another commercial development. It seems short-sighted to build all this accommodation and not provide extra amenities for the increased population size to use. Already, I tend to go to Kingston for my shopping as it has a far bigger high st. By reducing the commercial spaces in Staines, we will be under serving the current and new residents of the area.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Ms Orianna Rosa Royle (40270977)</b>	
<b>Organisation:</b>	
<b>Response ID: 1112312</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ID1: Infrastructure and Delivery</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
I was also extremely disappointed to see little mention of Staines station. It is in serious need of regenerating. It's the first impression people have of the town, when they exit the train and it is a dump. So much so that it was cited as one of the reasons it was voted in the top 50 worst places to live in Britain! The train station and queues to purchase tickets, is already unmanageable without the increase in people using it. There was also no mention of attempting to become a part of the TFL Zones, despite a huge campaign which has attracted around 20,000 signatures from the people of Spelthorne who are tired of over paying for tickets when we are only one stop out of London TFL zoning.	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr David Ruch (41197153)</b>
<b>Organisation:</b>

<b>Response ID: 1111833</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Local Green Space: Sunbury Common: Catherine Drive I am one of the longest residents overlooking the small Green in Catherine Drive having lived here for over 50 years in this relatively quiet cul de sac. It has always been a pretty little Green, now enhanced by several large trees which are the subject of a Tree Preservation Order application. Although I don't have children myself, I have enjoyed seeing children happily and safely playing on the Green over these years. I am now disabled and can only walk a short distance. However I do manage daily to take a little walk around the Green which lifts my spirits and 'does me good'. I regard the Green as a little Oasis of open space in an urban area, and I sincerely hope this Green becomes a part of 'Local Green Space', protected from housing development.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Andrew Russell (25506849)</b>
<b>Organisation:</b>

<b>Response ID: 1108847</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST1: Presumption in Favour of Sustainable Development
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
No Response
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

Representations Made Under Regulation 20  
in Representor Order



<b>Respondent: Mr Andrew Russell (25506849)</b>
<b>Organisation:</b>

<b>Response ID: 1124071</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
The council must have brown belt land available for building. I accept that it will cost the developers more in land clearance. But NO BUILDING ON GREEN BELT
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
See above
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Councillor Olivia Rybinski (19531809)</b>
<b>Organisation: Spelthorne BC Councillor</b>

<b>Response ID: 1123646</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Green spaces and the green belt is what makes Spelthorne a unique area to live, you can drive 5 minutes down the road and you are driving through fields. There is however the need for much needed family housing. I do understand the need to provide a site for travellers, however I would like to see these on brownfields sites where possible and the list of green areas on the proposal shortened or non existent. I feel that many of our housing numbers should be built within our towns, especially in Staines. When we set out the work for the local plan, this is what residents wanted and there is much outrage from residents to build on any green belt. Staines has the opportunity to become a hub town for the airport, where people can stay, shop, spend money. I would like to see the Oyster card and zoning come into effect on our transport and I would like to see a light rail go from Staines to Heathrow. There is much opportunity for growth, excellent design and fulfilling our housing target within Staines.
<b>Question 6: You can upload any modifications below.</b>

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Councillor Olivia Rybinski (19531809)</b>
<b>Organisation: Spelthorne BC Councillor</b>

<b>Response ID: 1118028</b>
<b>Policy / Evidence Base / Part of Plan: Policy SP1: Staines-upon-Thames</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
I strongly disagree with putting our own height restrictions in Staines, I think the majority of our homes should be going there as the town can handle it and it has very good infrastructure in place. Given that we are so close to Heathrow with the 15 storey height restriction already in place, I believe that we should abide by this. I do not believe that our restrictions can be implemented within planning law. As for the proposed conservation area in Staines, the Bridge Street car park site and Hanover House are an eyesore and the area is in desperate need of regeneration. The site is suitable for a hotel and residential flats, with a redevelopment of the water front. This would encourage people to stay in the area and have facilities which enhance the Thames frontage. We should be more concerned with the design and specification of a building, rather than its height. I would like to see the use of green walls, balconies and green roofs to help absorb pollution within proposals.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Councillor Olivia Rybinski (19531809)</b>	
<b>Organisation:</b> Spelthorne BC Councillor	
<b>Response ID:</b> 1117946	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Please find the attached detailed submission for Local Green Space, the submission contains location map, photo, reason and contact details. This location is critical to be protected, and is highly valued by local residents. I would also like to take the opportunity to thank you for all your hard work on the local plan, this is appreciated by the residents of Spelthorne.	
<b>Question 6:</b> You can upload any modifications below.	
LDF Village AshT 2209p NI_OR.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/587086/PDF/-/LDF%20Village%20AshT%202209p%20NI%5FOR%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/587086/PDF/-/LDF%20Village%20AshT%202209p%20NI%5FOR%2Epdf</a>	
Gething, Rybinski - LDF Connaught AshT_Redacted.pdf	

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619737/PDF/-/Getting%5F%20Rybinski%20%2D%20LDF%20Connaught%20AshT%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Robert Sainsbury (41397217)</b>	
<b>Organisation:</b>	
<b>Response ID: 1124060</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
I AM STRONGLY OPPOSED TO ANY DEVELOPMENT OF THE GREEN BELT SITE AT KEMPTON PARK. IT IS A VITAL REMAINING PIECE OF GREEN BELT IN AN ALREADY OVER DEVELOPED AREA. THE INCREASE IN TRAFFIC ON VERY OVERCROWDED AREAS WOULD BE IMPOSSIBLE AND LOCAL SCHOOLS AND HEALTH SERVICES WOULD BE UNABLE TO COPE. INDEED IT IS ALREADY IMPOSSIBLE TO GET AN APPOINTMENT AT THE LOCAL HEALTH PRACTICE. NOT TO MENTION THE CATASTROPHIC EFFECT ON THE NATURE AND WILDLIFE THAT SURVIVE ON THE SITE.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No Response	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Denise Saliagopoulos (43370657)</b>	
<b>Organisation:</b>	
<b>Response ID: 1130566</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
More than one reason for why the plan is not sound were given: Not positively prepared, not justified, not effective, not consistent with national policy.	
This objection, to the draft Spelthorne Local Plan has been prepared by Les West BA Hons DipTP RTPI of leswestplanning on behalf of Mrs Saliagopoulos and Mr Tom Napper who are joint landowners of the site known as Land adjacent to no 3 Penton Hook Farm, Staines ('the Site'), see Site Location Plan in Appendix 1.	
This objection relates specifically to the failure of SBC to provide for sufficient housing numbers over the plan period and to either amend the Green Belt boundary in the vicinity of the site and/or to include the site as a site allocation. In a call for sites submission to SBC in early 2020, the landowners informed the Council that the Site could deliver approximately 11 housing units.	

We consider that the draft Plan has not met any of the four 'Tests of Soundness' which are set out in the National Planning Policy Framework July 2021, i.e. that the Plan should be 'positively prepared', 'justified', 'effective' and 'consistent with national policy'. We do not consider that the Plan has met these 'tests' in respect of the provision of sufficient housing numbers, the consideration of the removal of the Green Belt designation of the Site and the potential contribution it could make in meeting local housing need in Spelthorne.

#### POLICY ST2 PLANNING FOR THE BOROUGH

Even though SBC has followed the Government's standard methodology for the calculation of an objectively assessed housing need in preparing the draft Local Plan, the housing target for the plan period which is proposed in policy ST2 is an under-estimate as it has failed to recognise the need for a 20% additional buffer in recognition of past under delivery.

In the statistics for the Housing Delivery Test 2021 published earlier this year, Spelthorne was found to have delivered 69% of its housing requirement over the last 3 years. This means that there is a presumption in favour of sustainable development as well as a requirement for an additional 20% buffer in the housing requirement. Policy ST2 has not taken this into account and therefore it falls short of the number of housing units which should be planned for over the plan period.

Policy ST2 should propose a more robust figure for housing which reflects the 31% under delivery of housing in the years 2018 to 2021 by adding a further 20% buffer. This would mean a housing requirement increased by an additional 134 units a year to 742 units.

Guildford Borough Local Plan adopted in 2019 has set a precedent for the provision of a housing target in excess of that merely calculated using the Government's methodology. From a figure of 10,678 units derived from the Government's methodology alone it proposes to deliver a total of 14,602 units. This represents an increase of 37% above the figures resulting from the standard methodology.

The adoption of the Guildford Local Plan was challenged in the High Court by local residents who claimed that the housing numbers proposed was excessive. This was overruled by the High Court judge who supported the Planning Inspector's conclusions that in view of the exceptional circumstances there was a justification for the 'headroom' in the housing numbers and that this provided 'flexibility' in the Plan to meet future changes.

If SBC was to provide for even just a 20% additional buffer, sites such as the land adjacent to 3 Penton Hook Farm Staines, which is in an area said to perform weakly against the five purposes of the Green Belt, would need to be removed from the Green Belt and made available for housing development.

TESTS OF SOUNDNESS It is our view that the draft Local Plan fails to meet the 'tests of soundness' for a Local Plan, as set out in the NPPF, in a number of respects. These are discussed further below.

a) Positively prepared It is disappointing that SBC has not followed Guildford Borough Council in providing a more aspirational approach to the delivery of sufficient housing units for the future by setting a housing target which reflects historic under delivery. It is clear from the introduction to the Plan that this is being proposed reluctantly and that the local authority would prefer to be proposing a smaller number. From the example of the site at land adjacent to 3 Penton Hook Farm, opportunities to provide additional housing without causing harm to the Green Belt have clearly been missed. The failure to provide a 20% additional buffer is evidence that the draft Local Plan has not been 'positively prepared'.

b) Justified SBC has not sought to properly justify why it has not provided a housing number which exceed the bare minimum calculated from the Government's methodology. The appraisal of the Site in the AASNA also shows that a potential housing site in a sustainable location has been dismissed without any justification or any proportionate evidence.

c) Effective It is not clear that sufficient housing sites will be able to be delivered over the plan period. It is very likely that delivery will fall short. Inclusion of the Site described in this report would assist, albeit in a modest way, to meet local housing demand. The exclusion of this Site undermines the effectiveness of the Plan in delivering its stated Strategy.

Continues on attached PDF

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

The housing target in ST2 should be increased to reflect a higher number reflecting the need for a 20% buffer as discussed above.

**Question 6:** You can upload any modifications below.

Draft Spelthorne Local Plan Reg 19 Land adj to 3 Penton Hook Farm Staines Obj to ST2 and SP4 220811.pdf

<https://spelthorne.inconsult.uk/gf2.ti/af/1409506/626111/PDF/->

[/Draft%20Spelthorne%20Local%20Plan%20Reg%2019%20Land%20adj%20to%203%20Penton%20Hook%20Farm%20Staines%20Obj%20to%20ST2%20and%20SP4%20220.pdf](https://spelthorne.inconsult.uk/gf2.ti/af/1409506/626111/PDF/-/Draft%20Spelthorne%20Local%20Plan%20Reg%2019%20Land%20adj%20to%203%20Penton%20Hook%20Farm%20Staines%20Obj%20to%20ST2%20and%20SP4%20220.pdf)

Mrs Salagopoulis Land adj to 3 Penton Hook Farm Staines Rep Form\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/af/1409506/626112/PDF/->

[/Mrs%20Salagopoulis%20Land%20adj%20to%203%20Penton%20Hook%20Farm%20Staines%20Rep%20Form\\_Redacted.pdf](https://spelthorne.inconsult.uk/gf2.ti/af/1409506/626112/PDF/-/Mrs%20Salagopoulis%20Land%20adj%20to%203%20Penton%20Hook%20Farm%20Staines%20Rep%20Form_Redacted.pdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To provide further evidence to support representations

<b>Respondent: Mrs Denise Saliagopoulos (43370657)</b>	
<b>Organisation:</b>	
<b>Response ID: 1130589</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not consistent with national policy	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
See sheets attached More than one selected: Not positively prepared, Not justified, Not effective, Not consistent with national policy. This representation is related to representation on policies ST2 and SP4 and the changes to the Policies Map	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Amend Policies Map to remove land adjacent to 3 Penton Hook Farm, Staines from the Green Belt and allocate it for housing.	
<b>Question 6:</b> You can upload any modifications below.	
Mrs Salagopoulos Land adjacent to 3 Penton Hook Farm Staines leswestplanning Representation_Form_Pre-submission_Spelthorne_Lo.url <a href="https://spelthorne.inconsult.uk/gf2.ti/af/1409506/626256/PDF/-/Mrs%20Salagopoulos%20Land%20adj%20to%203%20Penton%20Hook%20Farm%20Staines%20Rep%20Form_Redacted.pdf">https://spelthorne.inconsult.uk/gf2.ti/af/1409506/626256/PDF/-/Mrs%20Salagopoulos%20Land%20adj%20to%203%20Penton%20Hook%20Farm%20Staines%20Rep%20Form_Redacted.pdf</a>	

Draft Spelthorne Local Plan Reg 19 Land adj to 3 Penton Hook Farm Staines Obj to ST2 and SP4 220811.pdf.url

<https://spelthorne.inconsult.uk/gf2.ti/af/1409506/626255/PDF/->

[/Draft%20Spelthorne%20Local%20Plan%20Reg%2019%20Land%20adj%20to%203%20Penton%20Hook%20Farm%20Staines%20Obj%20to%20ST2%20and%20SP4%20220.pdf](https://spelthorne.inconsult.uk/gf2.ti/af/1409506/626255/PDF/-/Draft%20Spelthorne%20Local%20Plan%20Reg%2019%20Land%20adj%20to%203%20Penton%20Hook%20Farm%20Staines%20Obj%20to%20ST2%20and%20SP4%20220.pdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To be able to present the merits of the Site being removed from the Green Belt and being able to demonstrate the site as a sustainable location suitable for sustainable development in line with the strategy of the draft Local Plan.



<b>Respondent: Mrs Denise Saliagopoulos (43370657)</b>	
Organisation:	
<b>Response ID: 1130578</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy SP4: Green Belt	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not consistent with national policy	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
See sheets attached	
<p>In the AASANA the site appraisal of land adjacent to 3 Penton Hook Farm it is concluded that the site could contribute to the overall strategy of the Local Plan. It is in an area that was assessed as performing weakly against the purposes of Green Belt in the NPPF. As the site is enclosed and not particularly visible, there would be no harm to the Green Belt if it were to be allocated for development.</p> <p>In Section 6 of this report, we have set out the reasons why we consider that the draft Spelthorne Borough Local Plan is unsound. There needs to be a more realistic housing target for the plan period which addresses the need for a 20% buffer and additional land needs to be identified, in particular land at 3 Penton Hook Farm Staines should be removed from the Green Belt and allocated for housing development. We respectfully ask the Inspector to make recommendations that the draft Local Plan should have a more aspirational housing target and that sites in weakly performing areas of the Green Belt which are in sustainable locations, such as the land adjacent to 3 Penton Hook Farm, should be allocated for housing development. The appraisal of</p>	

the Site in the AASNA confirms that it is not a site which makes any contribution to the Green Belt and there are no Green Belt reasons why it should remain open. Given that SBC has made only relatively minimal adjustments to the Green Belt Boundary in this draft Plan including not proposing any safeguarded land for future years beyond the plan period, it is very likely that the next round of local plan preparation will need to look at making alterations to the Green Belt boundaries for the period beyond 2037.

See attached PDF for further info

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

The Policies Map should be amended to delete the Site, land adjacent to 3 Penton Hook Farm from the Green Belt and for it to be allocated for housing.

**Question 6:** You can upload any modifications below.

Draft Spelthorne Local Plan Reg 19 Land adj to 3 Penton Hook Farm Staines Obj to ST2 and SP4 220 (2).pdf

<https://spelthorne.inconsult.uk/gf2.ti/af/1409506/626207/PDF/->

[/Draft%20Spelthorne%20Local%20Plan%20Reg%2019%20Land%20adj%20to%203%20Penton%20Hook%20Farm%20Staines%20Obj%20to%20ST2%20and%20SP4%20220.pdf](https://spelthorne.inconsult.uk/gf2.ti/af/1409506/626207/PDF/-/Draft%20Spelthorne%20Local%20Plan%20Reg%2019%20Land%20adj%20to%203%20Penton%20Hook%20Farm%20Staines%20Obj%20to%20ST2%20and%20SP4%20220.pdf)

Mrs Salagopoulis Land adjacent to 3 Penton Hook Farm Staines leswestplanning Representation\_Form.pdf

<https://spelthorne.inconsult.uk/gf2.ti/af/1409506/626208/PDF/->

[/Mrs%20Salagopoulis%20Land%20adj%20to%203%20Penton%20Hook%20Farm%20Staines%20Rep%20Form\\_Redacted.pdf](https://spelthorne.inconsult.uk/gf2.ti/af/1409506/626208/PDF/-/Mrs%20Salagopoulis%20Land%20adj%20to%203%20Penton%20Hook%20Farm%20Staines%20Rep%20Form_Redacted.pdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To promote the site at land adjacent to 3 Penton Hook Farm Staines for housing and for it to be removed from the Green Belt.

<b>Respondent: Helen Salley (41905665)</b>
<b>Organisation:</b>

<b>Response ID: 1115672</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I wish to support protecting the local green space down Queens Walk TW15. I am a resident of this street and the green space behind Queens walk is constantly used by myself to walk my dog and my children frequently fly play on this green space. Also many residents of Queens walk and the surrounding roads also use this space for the same reasons. A jubilee party was also held on this green space this year 2022 which brought the local community together.
<b>Question 6:</b> You can upload any modifications below.
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Katlian Salley (41993857)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117297</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
I wish to support protecting the local green space down Queens Walk TW15. I am a resident of this street and the green space behind Queens walk is constantly used by myself to walk my dog and my children frequently fly play on this green space. Also many residents of Queens walk and the surrounding roads also use this space for the same reasons. A jubilee party was also held on this green space this year 2022 which brought the local community together.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1116861</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Evidence base - SLAA and Methodology; Evidence base - Housing; Duty to Cooperate	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No	Additional Comments: NB The guidance notes you have linked here don't correspond to the questions set here.
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No. NB The guidance notes you have linked here don't correspond to the questions set here. (continued from Q1) ... The current SLAA says in its conclusions: "3.2 The next iteration of the SLAA will form part of the evidence base that supports the publ	Additional Comments: No. NB The guidance notes you have linked here don't correspond to the questions set here. <div><strong>(continued from Q1) ...</strong></div> <div><strong>Th</strong><strong>e current SLAA says in its conclusions:</strong></div> <div> <div><em>&quot;
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Unsure. NB The guidance notes are not linked but the guidance notes section for Q2 and Q3 linked here <a href="https://www.spelthorne.gov.uk/article/20806/Guidance-Notes-on-Submitting-a-Representation">https://www.spelthorne.gov.uk/article/20806/Guidance-Notes-on-Submitting-a-Representation</a> indicate that a failure in the Duty to cooperate would render	Additional Comments: Unsure. NB The guidance notes are not linked but the guidance notes section for Q2 and Q3 linked here <a href="https://www.spelthorne.gov.uk/article/20806/Guidance-Notes-on-Submitting-a-Representation" rel="noopener">https://www.spelthorne.gov.uk/artic
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	

If you wish to **support** the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:

No Response

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

The whole consultation process has been difficult to follow, not least because the structure of the questionnaires has changed since the beginning of the consultation and differs to the guidance on the website, even now (20<sup>th</sup> September). This makes the whole thing very difficult to access and to navigate although I get that it is not principally geared to residents.

There are many minor and, in my view, a good number of major issues with the Local Plan Pre-submission document, both in the policies and site allocations.

There was just one online questionnaire on the Local Plan as at 15<sup>th</sup> June 2022 (and another for the SDF). This was changed in July I believe and increased to 82 for the Local Plan following a test phase early July (after the consultation had started) obviously in an attempt to make it more consistent with the 'paper' version referenced in Q6 above and the stringent guidance for representations. The last update to this main questionnaire was made 8 weeks ago, so around the middle of July 2022, the other 81 (26 policies and 55 allocations) were added in July and last updated around 7 weeks ago.

I believe the whole issue of how the consultation process has been run (with lots of documents being added late, in some cases mid-August) brings into question whether the whole thing complies with the procedure guide for Local Plan examinations, referenced above and linked again here -

<https://www.gov.uk/government/publications/examining-local-plans-procedural-practice/procedure-guide-for-local-plan-examinations> .

I am not a lawyer, so cannot be sure of the legalities around legal compliance and this guidance does possibly relate to the examination itself. I also note that it states therein:

"The legislative requirements for the examination are contained in the Planning and Compulsory Purchase Act 2004 (as amended) [PCPA] and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) [the Regulations]. Some guidance on procedure is also provided in the PPG chapter on Plan-making. However, many of the detailed procedural aspects of the examination are not prescribed in legislation, allowing the Inspector a degree of flexibility in conducting the examination. This enables the Inspector to adapt the procedures to deal with situations as they arise, so as to achieve positive outcomes in a range of different circumstances.

Nonetheless there is a need for reasonable consistency in the way that local plan examinations are conducted. Together with the PPG, therefore, this document provides the main operational framework for examinations. Inspectors will also have regard to the spirit of other procedures adopted in the planning system. For example, timescales for making documents available and giving notice to hearing participants will be based on established good practice. As in all their work, Inspectors will adhere to the Franks principles of openness, fairness and impartiality."

I would like to refer specifically to 'Section 1: Before submission' and what is expected, in particular with regard to 'Evidential requirements'. I am not familiar with the Franks principles as such but would hope that all matters will be viewed with openness, fairness and impartiality.



No, I do not agree that the evidence used for the Pre-submission Local Plan is adequate, up-to-date and relevant.

ISSUE (SLAA & SLAA Methodology):

I consider Spelthorne's Local Plan to be unsound for the following reason.

The Council's Strategic Land Availability Assessment (SLAA) is significantly inconsistent with its own SLAA Methodology and hence fails on several tests of soundness.

I also consider it fails to meet the 'Evidential requirements' laid out in the government's Local Plan guidance -

<https://www.gov.uk/government/publications/examining-local-plans-procedural-practice/procedure-guide-for-local-plan-examinations>. It therefore possibly also fails on legal compliance.

The SLAA Methodology [635.03KB] was updated in December 2021. The current Strategic Land Availability Assessment - 2021 [831.24KB] was published earlier in the year and is still in an older format.

The Methodology is not directly listed individually on the online Evidence Base but is on one of the click through links from the online page here (also see Appendix 1) -

Strategic Land Availability Assessment - SLAA  
2021 Update

It writes at length about flood risk and suitability of sites which the SLAA should rightly consider - it is a substantial constraint to be overcome in Spelthorne.

Section 135 of the SLAA Methodology states:

"135. Each Council's final SLAA will consist of two documents:

- A Report, which details the SLAA assessment background, methodology and conclusions
- A Sitebook, showing each site to scale and including various physical constraints and officer assessment of the developable and deliverable nature of the site, including the type and estimated quantity of development. The Sitebook may be broken down into separate sections/documents to reflect different site typologies, sizes and phasing."

The issue is that the current SLAA is the 2021 Update which is based on evidence up to March 2021 and only mentions flood risk once (for a site in Sunbury). It is completely inconsistent with its own methodology (not to mention the Strategic Flood Risk Assessment) and was supposed to have been updated in 2022 for Regulation 19 but has not been replaced.

... (continued under Q3)

Thank you.

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618732/PDF/-/Sanders%5F%20Kath%2Epdf>



**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Yes, I would like to attend because I do not consider that the voice of residents has been heard.

<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122087</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Consultation process	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
I. The process Over the last 5 years I have witnessed residents not being listened to and have seen their views mis-represented and brushed aside on countless occasions. Many feel they have no voice. Many have given up. I do not envy Members - the route to this point has been difficult and acrimonious as the Foreword to the Local Plan makes painfully clear. However, the Route to 2037 and beyond will be a lot worse for many if Spelthorne doesn't change course.	
<b>Question 6:</b> You can upload any modifications below.	
Sanders, Kath.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618755/PDF/-/Sanders%5F%20Kath%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618755/PDF/-/Sanders%5F%20Kath%2Epdf</a>	



**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Kath Sanders (19813377)</b>
<b>Organisation:</b>

<b>Response ID: 1122090</b>
<b>Policy / Evidence Base / Part of Plan:</b> Plan preparation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Overall impression Every mix-up only adds to the impression of a Council which obfuscates and confuses rather than communicates and clarifies, whether by accident or design. At every turn it feels like the whole thing becomes more impenetrable - truly daunting for anybody actually wanting to make a contribution. It's very apparent that a lot of the work done is "desk-based research" or has involved taking something somebody else has said or written as factually correct without checking it or going out and looking for oneself or, heaven forbid, actually listening to residents. In this way, it's perhaps easy to see how "partly important" becomes "partly less important", "less strongly performing" becomes "more weakly performing" and on we go - it feels a bit like a game of Chinese Whispers.

Possibly emboldened by early success (the redevelopment of Brooklands College campus in Ashford for housing, for example, which incidentally overruled an objection from Sports England), it has continued on, inexorably and painfully to this point, seemingly unstoppable. Unstoppable despite the fact that the Council did indeed declare a Climate Emergency in October 2020 which added a whole new dimension and should have added a whole raft of additional constraints, backed by the whole Council and based on a solid understanding of what we're facing. The approach to the Local Plan should have fundamentally changed then and should now be calling for/demanding "radical" reductions in greenhouse gas emissions when considering new development and taking "full" account of flood risk in line with para 152 of the National Planning Policy Framework (NPPF, July 2021).

Unstoppable despite the fact that even Surrey's Interim Local Strategic Statement 2016-2031 says the area is "severely constrained" and the whole Upper M3 area of Spelthorne/Runnymede/Elmbridge might not be able to meet housing need within its boundaries - see Interim LSS, starting at para 3.6 and culminating at para 3.21 which states:

"Given that land in the Upper M3 area is severely constrained, it is unlikely that all the development needs identified will be met in full. To seek to maximise housing delivery, consideration will need to be given as to whether other less constrained sub-areas in Surrey, or beyond the county boundaries are able to support additional development in order to meet any unmet needs."

That sounds sensible, let's do that.

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618756/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122093</b>	
<b>Policy / Evidence Base / Part of Plan: Duty to Cooperate</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Duty to Cooperate No LPA anywhere, ever, really wants to take any other LPA's unmet need. This points to one of the biggest failures of the planning system, the Duty to Cooperate, which is beyond the scope of Spelthorne's Local Plan but will nevertheless potentially have a huge impact. NB That's before any potential further movement on Heathrow expansion, Crossrail 2 or Southern Rail Access to Heathrow which would bring Development Consent Orders and mean all bets were off - and we've had enough trouble locally just with the Esso Pipeline Project. There are many things I've seen and read along the way which hint at a failure in the Duty to Cooperate in the preparation of Spelthorne's Local Plan. However, as a lay person, the legalities are beyond me and it potentially opens up a whole other can of worms. I will stop short of going down that route.	
<b>Question 6: You can upload any modifications below.</b>	

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618757/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122098</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Plan preparation; Publishing Evidence; Consultation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>1. Variations on Spelthorne’s Local Plan 2022-2037</p> <p>Notwithstanding the caveat that gave permission for minor amendments to be made prior to publication, what the Environment &amp; Sustainability Committee and subsequently full Council signed off on 26<sup>th</sup> April and 19<sup>th</sup> May 2022 respectively was significantly different to what was published as the Pre-submission Local Plan (and associated Evidence Base) on 15<sup>th</sup> June 2022 - the structure changed (chapters shuffled), policies moved and renamed (DS2), references to (non-existent) “key evidence” removed (Spelthorne BAP), a good deal of detail filled in. It was still incomplete and littered with errors even on publication, compounded by the changes which added to the inconsistencies both within the document itself and with a good number of documents on the Evidence Base.</p>	

Evidence of this can be seen by a quick review of the documentation available to Members at the meetings on 26<sup>th</sup> April and 19<sup>th</sup> May 2022 (LINKS 8 & 9) and the status of the online Evidence Base as at the start of 19<sup>th</sup> May (see attached Appendix 1). NB Many more documents were made available on the online Evidence Base during the course of 19<sup>th</sup> May alone but its unreasonable to expect all Members to have had sufficient time to take in all the additional information on the day.

This is indicative of the haphazard approach and the rush at the end to get things through. One could be forgiven for thinking it was deliberately so - so much data, so little time. The Council has form on this.

There were further inconsistencies generated when the online plan and associated documents were published which one may have noted, not least regarding the Policies Maps and Monitoring Framework - more on that below. I did highlight some and others were picked up and corrected after the fact but some not for weeks after the start of the public consultation and some not even now.

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618758/PDF/-/Sanders%5F%20Kath%2Epdf>

Sanders, Kath - APPENDIX 1\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618953/PDF/-/Sanders%5F%20Kath%20%2D%20APPENDIX%201%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Kath Sanders (19813377)</b>
<b>Organisation:</b>

<b>Response ID: 1122101</b>
<b>Policy / Evidence Base / Part of Plan:</b> Plan preparation; Publishing Evidence; Consultation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
<p>2. Status of the Evidence Base</p> <p>The Evidence Base has been slow in being made available with a torrent of information being issued only on and since 26<sup>th</sup> April 2022 as mentioned above, despite a number of documents seemingly being finished prior (for example the Local Green Space review dated January 2022 was only published on 26<sup>th</sup> April 2022). It was still missing Key Documents on 15<sup>th</sup> June 2022 with a further 20* documents being published all the way up to 17<sup>th</sup> August 2022 (LINK 10). Even then it was incomplete.</p> <p>* the list shows 21 documents but one is a duplicate</p> <p>The upshot of adding evidence late is that many stakeholders will have not been aware of all the additional documentation when making their representations, nor would they have had the time to filter the extra detail (which included the Viability Assessment, the Habitats Regulations</p>

Assessment, another Green Belt Assessment and critically the Level 2 Strategic Flood Risk Assessment). These documents contain absolutely key information which should have been subject to earlier review, if not by the public, then at least by Members. Furthermore, standing back and looking at the bigger picture, a number of things look awry, or at least are still missing from the online Evidence Base as at 18<sup>th</sup> September 2022.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Kath Sanders (19813377)</b>
<b>Organisation:</b>

<b>Response ID: 1122103</b>
<b>Policy / Evidence Base / Part of Plan: SLAA; Housing Trajectory/5YLS</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
The Strategic Land Availability Assessment (SLAA) is out of date. The "SLAA Methodology" was updated in December 2021 and is on the Evidence Base. The current SLAA on the Evidence Base (the 2021 Update) reflects the position as at 31 <sup>st</sup> March 2021. So the SLAA Methodology post-dates the current SLAA. The current SLAA states in its conclusion that the "next iteration of the SLAA will form part of the evidence base that supports the publication and submission Local Plan." This is critical as the current SLAA (and at least the two before it) didn't address the flood risk issues when considering the suitability of sites, something it was supposed to do - in fact only one site in the whole assessment (in Sunbury) references flood issues. Obviously aware of this, the SLAA Methodology planned to address the issue and mentions flooding 76 times. However, an updated SLAA has not been published. One of the last documents published on the online Evidence Base (the Local Plan Housing Trajectory and Five Year Housing Land Supply, itself only published on 16 <sup>th</sup> August 2022), says the Council is still in the process of updating the SLAA for 2022.

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618759/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122106</b>	
<b>Policy / Evidence Base / Part of Plan: SFRA; SLAA; SA</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: no	Additional Comments: No
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
<p>There is no obvious place where the Sequential Test “for the Local Plan as a whole” has been carried out and documented. It is referenced in the Level 1 SFRA as being required which states in Section 4.2: “The Sequential Test should be undertaken by Spelthorne BC and accurately documented to ensure decision processes are consistent and transparent”. It is referenced in the Level 2 SFRA as having been a requirement where it states in Section 1.2.3: “Using the strategic flood risk information presented within the Level 1 SFRA, Spelthorne BC can undertake the Sequential Test which is the decision-making process whereby future development is steered towards areas of lowest flood risk.” The Level 2 SFRA goes on to analyse individual sites. Neither document appears to include the ‘Sequential Test for the Local Plan’. I have also checked the SLAA, the SA and even the Site Selection Methodology (which says absolute constraints should have been assessed at Stage 1). These are discussed further in Sections 3 and 4 below.</p>	

The overwhelming impression is that the Council are not in control of the process. It cannot be said that the Local Plan is legally compliant.

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618760/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mrs Kath Sanders (19813377)</b>
<b>Organisation:</b>

<b>Response ID: 1122110</b>
<b>Policy / Evidence Base / Part of Plan: Sustainability Appraisal</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: no   Additional Comments: No
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
3. Sustainability Appraisal (SA) & Non-Technical Summary The Strategy and Strategic Policies are laid out in Chapter 3 of the Local Plan and are discussed below in greater detail. However, all roads appear to lead back to the Sustainability Appraisal so I will start here. A new Sustainability Appraisal was issued in June 2022, along with a Non-Technical Summary and an updated SA/SEA Scoping Report. Based on the detail, and notwithstanding the fact that the SA itself (at 352 pages, with Appendix A from p.89 and Appendix B from p.122) is all pretty impenetrable to the lay reader and highly subjective, it can be seen that the conclusions drawn are more mixed than they might at first appear. They are also inconsistent.

The SA states in para 7.3 (p.72) that “Overall, the Regulation 19 Draft Local Plan is expected to have a positive effect against all sustainability objectives.” It then also concludes more definitely in 9.2 (p.87) that the “appraisal shows that the Regulation 19 Draft Local Plan policies will have a positive effect, to varying degrees, against all Sustainability Appraisal objectives.”

These are not true statements, however. Fundamental inconsistencies creep in within the two documents relating to the conclusions drawn by the Sustainability Appraisal which can be seen in a few short paragraphs at the end of the Non-Technical Summary (paras XLVII – LVII).

The right conclusion appears to be correctly stated in the SA Non-Technical Summary, para L on p.12, albeit this is fairly hidden away and obviously inconsistent with the main report’s conclusion (and seemingly with its own conclusion a few paragraphs later in LVII on p.13). It states:

“Minor adverse cumulative effects of all proposals in the Spelthorne Local Plan in combination with development plans in neighbouring authorities were identified for SA Objectives: Water, Pollution and Flood Risk.”

The minor adverse cumulative effects can also be seen in the table at para XLVII where “minor adverse cumulative effects of all proposals in the Draft Spelthorne Local Plan were identified” against 5\* (of the 12) SA Objectives.

\* I think the table might have meant to list three but includes five.

The detail in Table 14 the main SA report (starting on p.72) shows that seven objectives have an overall ‘positive’ score, two objectives have a ‘neutral’ score and three objectives have a ‘negative’ score. The three negatives, as it clearly states in para L. on p.12, are for the objectives of flood risk, pollution and water - namely THREE objectives primarily linked to the ENVIRONMENTAL objective of para 8 of the NPPF.

Paragraph 8 of the NPPF states that the three overarching objectives of the planning system (economic, social and environmental) are “interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)”. Spelthorne’s SA indicates that there is clearly an imbalance between these three, even supposing we accept all the SA Indicators are fair and reasonable judgements.

To explore this further, I took another look. The SA is wrapped up in layer upon layer of subjective assumptions with broad conclusions drawn at every turn which appear to render a different picture to that presented if you look at the detail (and even if, again, you accept the assumptions on which they are based). Peeling back the layers is illuminating.

For example, the SA states in para 6.4 (p.70) that the “detailed site assessments set out in Appendix B identified largely positive sustainability effects”. I beg to differ. Appendix B is difficult to decipher and there appears to be little hard science behind it but it is beautifully colourful - scrolling through the 230 pages it would seem most effects are deemed to be yellow (benign) or pink (vaguely negative). It doesn’t sort the 55 chosen site allocations separately to those rejected so it is difficult to completely disprove the sentiment of their conclusion, even if it doesn’t technically follow.

You can, however, see a summary of the ‘local impacts’ of the 55 chosen Local Plan Site Allocations summarised in Table 13 on p.67-70. It again provides a mixed picture and is hard to discern.

If you rearrange the columns roughly by level of impact, a much more vivid picture again emerges. (See attached Appendix 2, Figure 1) - I've simply rearranged the columns from Table 13 in the latest SA (p.67-70). I think most can see (and hopefully you will agree) that the picture is a bit more telling than we are led to believe.

The balance here is obviously tipped substantially in favour of Housing / Transport / Land & Soils\* / Economic Development - a bucket of objectives much more geared to the NPPF's social and economic objectives than environmental.

\*mostly seemingly from a strategic land use planning perspective

And that's only if we get all the promised affordable housing, the sustainable travel, the "coherent Green infrastructure network" and the rest of the infrastructure. Promises, promises. One would hope that the viability and feasibility studies would already have been done to back this up. More on those below.

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618761/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122112</b>	
<b>Policy / Evidence Base / Part of Plan: SFRA; SLAA; Housing Trajectory</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: no	Additional Comments: No
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
<p>4. Strategic Land Availability Assessment (SLAA), SLAA Methodology and Site Selection Methodology</p> <p>Availability of land with respect to flood risk</p> <p>The Strategic Flood Risk Assessment (SFRA) is clear that there should be a Sequential Test for the Local Plan. This would presumably assess the borough's overall position in relation to flood risk (from all its sources) not just site-specific Sequential Tests as found in the Level 2 SFRA. This is not contained within the SFRA itself - either Level 1 or Level 2 although reference is made in both.</p> <p>In searching for a Sequential Test for the Local Plan which might assess the suitability of areas of the borough for development based on flood risk, there was no obvious sign. It seems to have fallen between the cracks. According to the guide on p.3 of the Level 1 SFRA 'Taking Flood Risk into account in the</p>	

preparation of a Local Plan', step 2 states: "The LPA uses the SFRA to: (i) Inform the scope of the SA for consultation; and, (ii) Identify where development[sic] can be located in areas with a low probability of flooding."

The SA seeks to balance all the different objectives but the Sequential Test was not clearly documented within it - note the updated Level 1 SFRA was only published in May 2022 and is supposed to inform the SA which was published in June 2022. One could realistically expect that the Level 1 SFRA should also inform the Strategic Land Availability Assessment (SLAA). However, there is no publicly available 2022 version of the Strategic Land Availability Assessment (SLAA) which discusses flood risk.

The current SLAA on the Evidence Base is the 2021 Update - Strategic Land Availability Assessment - 2021 [831.24KB]. This was, it says, based on evidence collected up to 31<sup>st</sup> March 2021. It says in Section 2.10 that "The SLAA methodology sets out the approach taken to assessing sites, including the constraints impacting the suitability of a site for development". Furthermore, Section 2.14 says that the Council was currently producing a viability assessment for the emerging Local Plan and that "this evidence will feed into the SLAA once available". However, no SLAA 2022 Update appears to have been published yet and the 2021 SLAA only mentions flood risk once (for one site in Sunbury). NB The Viability Assessment was published on 25<sup>th</sup> July 2022 (see below).

The SLAA Methodology [635.03KB] updated in December 2021 mentions flood risk a lot albeit it does not appear to conform with the view that all forms of flooding will be considered in determining a site's suitability (see p.14/15). There was no reference on the Council's SLAA page as of 18<sup>th</sup> September 2022 to a 2022 version of the SLAA reflecting this new methodology.

The Local Plan Housing Trajectory and Five Year Housing Land Supply [758.69KB] published on 16<sup>th</sup> August 2022 does reference a new SLAA in its graph on p.3. However it states in Section 2.10 that: "The Council is in the process of updating the SLAA for 2022 but in the interim has updated sites through the Regulation 19 stage of the Local Plan." Furthermore, it asserts in Section 2.18 that all the allocations it had listed were in suitable locations stating: "All the sites listed in Tables 4 and 5 above are in suitable locations and will contribute to the creation of sustainable mixed communities by providing appropriate housing to meet identified needs." However, there is no evidence presented to back up the suitability of the locations in this document.

Finally turning to the Site Selection Methodology - January 2022 [567.54KB]. Flood risk should clearly be assessed initially as part of Stage 1 and is alluded to in Chapter 1 'Stage 1 Assessment' as part of Stage 1b) - Initial Sift: Absolute Constraints. It is also covered in Chapter 5 'Stage 2 Assessment' as part of Stage 2b - Non-Absolute Constraints (see para 5.10). However, by the time specific sites are being discussed, we're already past the strategic plan-making point.

It may well have happened after the Level 1 SFRA was updated in 2021 (the Level 1 SFRA was apparently revised in March 2021 but wasn't made public) but as per the latest Level 1 SFRA, the Sequential Test for the Local Plan should be clearly documented, even if it's just a summary of the Stage 1 site assessments. This would make it legally compliant with the NPPF para 161 where it states "All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property".

The gap is where the new SLAA should be. The impression it leaves is that the Council is just trying to hit a preconceived target and shoehorn development in to fit.

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618762/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122115</b>	
<b>Policy / Evidence Base / Part of Plan: Viability</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: no	Additional Comments: No
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
<p>5. Viability Assessment (and Appendices)</p> <p>The Viability Assessment and all 8 appendices were only published for the first time on the 25<sup>th</sup> July 2022 according to the online Evidence Base. Obviously, 25<sup>th</sup> July 2022 was over a month after the start of the consultation and was not available (at least for public view) when the Council decision was made to proceed with Regulation 19 on 19<sup>th</sup> May 2022.</p> <p>The main takeout from this report is that it suggests that at least 5 site allocations in Staines are likely to be ‘non-viable’ under the 4 scenarios tested, certainly with the degree of affordable homes which is suggested in Local Plan policy H2 (30% per H2, Part 1).</p> <p>These are as follows:</p> <ul style="list-style-type: none"> <li>• ST4/019 Former Debenhams, Staines</li> </ul>	

- ST3/014 Birch House/London, Fairfield Rd, Staines
- ST4/024 Frankie and Benny's/Travelodge, Staines
- ST4/011 Thames Lodge Hotel, Thames Street, Staines
- ST4/009 The Elmsleigh Centre and Adjoining Land, Staines

This is based on a number of cost assumptions and provides various caveats. However, this could put a serious dent in the level of affordable housing that these sites (and potentially others too in other viability scenarios) can provide for the borough as a whole. The authors also state that they have not taken into account all potential infrastructure costs to which the developer would be expected to contribute towards. It seems unlikely too that they will have considered some of the specific site requirements which came out in the Level 2 Strategic Flood Risk Assessment published on the 26<sup>th</sup> July 2022. My main recommendation is that an urgent review of at least these five site allocations is required.

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618763/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122128</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Highways Assessment	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: no	Additional Comments: No
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>6. Surrey's Strategic Highways Assessment</p> <p>The updated Strategic Highways Assessment (which was only posted on the Evidence Base on 26<sup>th</sup> April 2022) talks about two different scenarios - the "Do Minimum" scenario and the "Do Something" scenario.</p> <p>It only really talks about the impact between those two scenarios and the conclusions drawn regarding the uplift being generally minimal. However, what it doesn't tell us is clearly how the baseline has been decided and how that has changed since the previous review.</p> <p>I have a number of queries about the report but possibly the most significant is that no obvious baseline is given and, comparing it back to the earlier Surrey Highways Assessment, it seems that the "Do Minimum" scenario has shifted dramatically and starts at a much higher base than even the Scenario "D" from the original report in 2019.</p>	

One would expect some change over the intervening period between the production of the two reports. However, the shift in the “Do Minimum” is TEN TIMES more than the difference between the “Do Minimum” and “Do Something” scenarios that the whole new report is based on – see attached Appendix 2, Tables 2 and 3.

Understandably, it would be useful to understand what has changed in the assumptions, but the details are not in the Technical Annex as far as it can be seen.

Given the timing of publication of this latest review, this consultation is again the first opportunity for stakeholders to flag any concerns.

My main recommendation is that clarity is provided as to what developments in Spelthorne are included in the baseline “Do Minimum” and what are included in the “Do Something”.

See attached document for tables.

**Question 6:** You can upload any modifications below.

APPENDIX 2 - TABLES 2 & 3.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/597536/PDF/-/APPENDIX%20%20%2D%20TABLES%20%20%5F%203%2Epdf>

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618764/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Kath Sanders (19813377)</b>
<b>Organisation:</b>

<b>Response ID: 1122141</b>
<b>Policy / Evidence Base / Part of Plan:</b> Evidence base - IDP
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: no   Additional Comments: No
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: no   Additional Comments: no
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Education (Chapter 4): Para 4.7 of the IDP Part 1 says “There is a clear impact on the need for additional school places as a result and the County Council [sic] required to set out the quantum of additional provision that will be required as a result of the anticipated growth.” It then goes on to compare forecast demand for school places vs. places available over 15 years but only tabulates it for secondary school places over the next 10 years. Para 4.8 is unclear and Appendix 2 with the detail is not attached to see the maths. It reasons that primary school places won’t be a problem overall but takes no account of the distribution. It shows a potential issue still with secondary school provision even with additional places at Thomas Knyvett College and provides no data for later years. All this whilst again not taking account of the

distribution and pressure on secondary schools in Staines (there's only one!) AND the fact that it says in para 4.3 that "LPAs should give great weight to the need to create, expand or alter schools to widen choice in education".

Conclusions - costs and funding (IDP Part 1, p.15,18,19,20):

- Early Years - the IDP admits there will be a problem but offers no solutions
    - o it says the Council will keep talking to Surrey CC - not dealt with but deferred
  - Primary School provision - it says there are enough primary school places in the borough
    - o no recognition of huge increase in population, notably with over 5,000 new homes in Staines and a considerable number in Ashford (as well as around Sunbury)
    - o outcome presumably is that more children will have to travel intra- and inter-borough (against principle of 20 minute neighbourhoods and building new homes near local services)
    - o IDP says "no identified additional costs"
  - Secondary School provision - it says there is a need but it will be met to some degree
    - o "Based on current forecasts there is a need for additional secondary school places in Spelthorne. From 2022, the expansion at Bishop Wand School, increased available capacity at Thomas Knyvett School and the opening of Heathside in Walton will go some way towards meeting the identified needs"
    - o "Surrey CC will continue to monitor the situation in respect of how the anticipated shortfall will be met and keep the Borough Council informed" - this is deferral
    - o "There are no identified additional costs in relation to secondary school provision in the Borough"
    - o again no consideration given to increase in population in Staines which only has one secondary school - outcome again that many more children will have to travel further intra- and inter-borough
  - SEND provision - the IDP hasn't identified any additional costs
    - o "There are no identified additional costs in relation to SEND provision in the Borough"
  - Sixth Form provision - proposal for new sixth form in Sunbury, close to six other schools (two with sixth forms)
    - o funding is unclear but it was made clear in at least one meeting that location was not a strategic decision but based on sites offered up
    - o the four other primary towns in the borough (Ashford, Staines, Stanwell and Shepperton) currently have no state sixth form options
  - Higher education provision - IDP says "no costs have yet been identified"
    - o IDP actually says with regards to potential expansion that there are "limitations due to the location of the Ashford campus on a school site" (Surrey CC deliberately moved the location a few years before to release the previous site for housing! - see EM3 success story - LINK 12)
- Other areas in IDP Part 1 includes the following:

• Flood Infrastructure (Chapter 13) - this chapter only really talks about the River Thames Scheme, admittedly vital in terms of mitigating flood risk from the main river in the borough but the information is out of date (referencing 17km in 3 sections, rather than 8km in 2 sections as it currently stands\*, as it has been for a while) and there's no mention of other identified risks or potential mitigation costs.

\* the River Thames Scheme appears to be shown correctly on the Policies Map

• Transport (Chapter 11) - this chapter is in three sections and deals primarily with "highways improvements and alternative modes of transport" (under SCC as highways authority) and rail with a small piece on Heathrow expansion proposals at the end. A Forward Programme of over £67m is mentioned for Surrey Highways but this document was last updated in November 2018 and includes some items which have now been completed as well as £25m (in 2016 prices) for Staines Bridge Capacity Improvements which needs reviewing. Furthermore the document is missing costs for some schemes and doesn't include all the potential new Spelthorne LCWIP costs. For rail, schemes are more nebulous and funding less certain (albeit likely to be funded by others).

• Waste & Recycling (Chapter 12) - it mentions that "SCC has identified a funding gap of circa £310,000 previously across Surrey. The Council will work with SCC to determine the impacts upon Spelthorne". The figure of £310,000 can be seen in the 2017 Infrastructure Study but the estimate is 5 years old and it can be seen that none of it was actually attributed to Spelthorne.

NB Part 2 of the IDP appears to be limited to possible amounts to be raised through developer contributions linked to site allocations and, so far, only has figures for health and police. IDP Part 2 concludes by saying it doesn't have the information to work out the funding required through developer contributions for education and highways improvements, stating:

"Additional funding could be secured for education and highways improvements for SCC if, and when this information is made available. Once the relevant traffic modelling work has been undertaken, any identified costs associated with potential mitigation, if necessary, can be included within the IDP."

Overall these findings are not encouraging. Or acceptable for an Infrastructure Delivery Plan upon which so much depends.

The IDP says in para 1.6, "The new Local Plan is required to be based on the most robust, up-to-date evidence available".

The purpose and scope of the Infrastructure Delivery Plan as laid out in IDP Part 1, paras 1.18-1.23 is the textbook definition of what's required but the IDP as provided in June 2022 does not do this. IDP Part 1 also says in para 2.9, "An accurate appreciation of planned, secured, and committed funding also needs to be established to gain a thorough understanding of the types of infrastructure which may be at risk if funding is not available and the potential effects of this on local populations." I don't believe the Council has established this either. I can pretty much categorically say that Policy ID1 Parts 1 and 2 are not supported by the IDP as it currently stands - the IDP does not set out "what is needed, where it is needed and when it is needed" (Local Plan, Section 9.3, p.123).

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618765/PDF/-/Sanders%5F%20Kath%2Epdf>



**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122160</b>	
<b>Policy / Evidence Base / Part of Plan: Sustainability Appraisal</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: no	Additional Comments: no
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: no	Additional Comments: no
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: no	Additional Comments: no
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
<p>15. Monitoring Framework</p> <p>In the printed version of the Local Plan, the chapter on the Monitoring Framework is nominally Chapter 12. NB There is no chapter reference in the online version, it having been relegated to the bottom of the last allocation ST4/009, obviously by accident.</p> <p>It is in any event reduced to just one line: “[For the Draft version of the plan the monitoring can be found in the main body of the document adjacent to the relevant policy].”</p> <p>My main recommendations are:</p> <p>MOD 1: that, given the importance placed on it in the Sustainability Appraisal, a full and proper monitoring framework should be included in the Local Plan which aligns with the 12 strategic objectives of the Sustainability Appraisal.</p>	

MOD 2: that the Local Plan Monitoring Indicators against the relevant policies should be reviewed and made consistent with the Monitoring Framework found in the latest Sustainability Appraisal on pages 29-34.  
It's unclear whether these would count as minor or major modifications.

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618766/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122161</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Appendix A - Spatial Portrait	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: no	Additional Comments: no
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: no	Additional Comments: no
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: no	Additional Comments: no
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>16. Appendix A - Spatial Portrait</p> <p>Appendix A is largely a cut and paste exercise which needs reviewing (e.g. 13.22). The Local Plan strategy is also completely at odds with some of the issues hi-lighted:</p> <ul style="list-style-type: none"> <li>• Section 13.27 recognises the poor air quality around Sunbury Cross, yet the Local Plan includes site allocations with proposals to build over 1,000 new homes within close proximity (mostly in blocks of flats) and to put another main 'trip attractor' in Lower Sunbury with the late added proposal for a new sixth form on Green Belt land next to Bishop Wand School</li> <li>• Section 13.24 recognises that Ashford has a shortage of space in some locations - notwithstanding that it wouldn't have had if it hadn't allowed building on the Brooklands Ashford campus, it now plans to compound the problem by adding another 1,000 new homes</li> </ul>	

- Section 13.25 recognises the impact of Heathrow on Stanwell and the importance of open land nearby and yet is proposing to release two large areas of Green Belt for development totalling over 6 hectares of greenfield land
- It also lists the following nine Key Challenges for the borough on p.250. The Local Plan doesn't do any of these things properly. It doesn't:
- Ensure we can allocate sufficient land to meet our housing need sustainably, including the provision of affordable homes and the needs of specific communities - it can't allocate sufficient land sustainably given the accepted constraints; it won't provide the promised level of affordable homes AND it won't meet the needs of specific communities
  - Maintain and intensify employment land, anticipating growth in the Borough, including additional growth from an expanded Heathrow Airport - it doesn't anticipate growth from an expanded Heathrow which is still on the cards
  - Plan for the necessary infrastructure, such as schools, roads and healthcare, to support our future population - it DOESN'T plan properly for the necessary infrastructure
  - Protect our valuable open spaces, recreation and leisure facilities and biodiversity sites, including the River Thames and waterbodies - it does very little to protect our valuable open spaces and biodiversity sites
  - Preserve the Green Belt where it is performing well against the purposes it was designated for - it doesn't preserve the Green Belt, not even all the Green Belt sites where the Council admits it is "performing well" (using their bespoke definition) against the designated purposes
  - Enhance the character of our towns and villages, including the vitality of our shopping areas - it doesn't enhance the character of the borough's towns and villages (see the Foreword again)
  - Manage further risk of flooding and prevent or mitigate harm from environmental impacts such as poor air quality and noise pollution - it doesn't have an appropriate flood risk management strategy that I can find and it admits that the Plan will likely produce minor adverse cumulative effects for Flood Risk, Pollution and Water
  - Ensure our Borough has the right amount of social, cultural and community facilities, including opportunities to support the arts - I can find no bigger picture - provision such as it is, seems piecemeal
  - Tackling Climate Emergency for the Borough. The Council's climate change emergency declaration demonstrates our commitment to addressing this major issue for society that hasn't gone away, even with the focus on COVID-19 - the Climate Emergency declaration was in October 2020 - 2 years ago - just stating your commitment repeatedly does not make it true - para 152 of the NPPF calls for "radical reductions in greenhouse gas emissions" - that is what is needed and is one of the major things the Local Plan fails to tackle in its building programme

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122164</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Appendix C - List of Evidence	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: no	Additional Comments: no
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: no	Additional Comments: no
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: no	Additional Comments: no
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
17. Appendix C: List of Evidence This should be reviewed and updated to reflect what has actually been provided as evidence and made consistent with the online Evidence Base (and ideally ordered in a seemingly less-random way). Minor modifications: <ul style="list-style-type: none"> <li>• Open Space Assessment (“Produce an Addendum”) - where is the Addendum?</li> <li>• Viability Assessment - was taken out of the May 2022 version but now can presumably be put back in!</li> <li>• SFRA (Draft Interim) - reference can presumably be updated</li> <li>• SA/SEA 2017 - reference can presumably be updated</li> </ul>	

- Annual AMR - the latest one or all of them?
- LGS Assessment Methodology - can presumably add LGS Review

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618776/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Kath Sanders (19813377)</b>
<b>Organisation:</b>

<b>Response ID: 1122165</b>
<b>Policy / Evidence Base / Part of Plan:</b> Consultation and Community Engagement
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: no   Additional Comments: no
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: no   Additional Comments: no
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: no   Additional Comments: no
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
<p>18. Consultation and Community Engagement</p> <p>Reading the Council’s Statement of Community Involvement (SCI), one could be forgiven in thinking that residents are broadly happy with the process and how everything has unfolded and reached this point. Talking to residents, you may get a different impression. It turns out a lot of it was just going through the motions - consultations were often box-ticking exercises, not really listening, papering over any cracks - many things had been decided long before.</p> <p>I’m happy to provide any of my responses to previous consultations and questions to Council if helpful. Relevant consultations responded to include the following:</p> <ul style="list-style-type: none"> <li>• Green Belt consultations x2</li> </ul>

- Issues and Options consultation 2018
- Local Green Belt Assessment Methodology 2018
- Open Space Assessment questionnaire 2019
- Preferred Options consultation, Nov/Dec 2019
- Staines Town Centre Development Framework, “Objectives and Options” consultation 2021
- LCWIP Stakeholder working group meetings x2, 2021
- Local Green Space Review - Oct/Nov 2021
- Review of Staines Consultation Area 2022
- Six summer consultations, 2022
- Staines Development Framework consultation, Jun-Sep 2022

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618775/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122260</b>	
<b>Policy / Evidence Base / Part of Plan: Sustainability Appraisal</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: no	Additional Comments: no
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: no	Additional Comments: no
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: no	Additional Comments: no
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
APPENDIX 2: TABLES 1. SUSTAINABILITY APPRAISAL The table of allocations when viewed by grouping together the more economic and social objectives is even more stark (based on Table 13: Summary of SA Scoring of Site Allocations (Local Impacts), p.67-70): Please see attached document.	
<b>Question 6: You can upload any modifications below.</b>	
APPENDIX 2 - TABLES - SA.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/597907/PDF/-/APPENDIX%20%20%2D%20TABLES%20%2D%20SA%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/597907/PDF/-/APPENDIX%20%20%2D%20TABLES%20%2D%20SA%2Epdf</a>	



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<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618774/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Kath Sanders (19813377)</b>
<b>Organisation:</b>

<b>Response ID: 1126438</b>
<b>Policy / Evidence Base / Part of Plan:</b> Evidence base - IDP
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
9. Infrastructure and Delivery - ID1 / ID2 and IDP Parts 1 & 2
<b>Question 6:</b> You can upload any modifications below.
Sanders, Kath.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618773/PDF/-/Sanders%5F%20Kath%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618773/PDF/-/Sanders%5F%20Kath%2Epdf</a>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Kath Sanders (19813377)</b>
<b>Organisation:</b>

<b>Response ID: 1108206</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST1: Presumption in Favour of Sustainable Development
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
No Response
<b>Question 6:</b> You can upload any modifications below.
Sanders, Kath.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618751/PDF/-/Sanders%5F%20Kath%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618751/PDF/-/Sanders%5F%20Kath%2Epdf</a>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: I do not consider that the voice of residents has been heard.

<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122162</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST1: Presumption in Favour of Sustainable Development	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>16. Appendix A - Spatial Portrait</p> <p>Appendix A is largely a cut and paste exercise which needs reviewing (e.g. 13.22). The Local Plan strategy is also completely at odds with some of the issues hi-lighted:</p> <ul style="list-style-type: none"> <li>• Section 13.27 recognises the poor air quality around Sunbury Cross, yet the Local Plan includes site allocations with proposals to build over 1,000 new homes within close proximity (mostly in blocks of flats) and to put another main 'trip attractor' in Lower Sunbury with the late added proposal for a new sixth form on Green Belt land next to Bishop Wand School</li> <li>• Section 13.24 recognises that Ashford has a shortage of space in some locations - notwithstanding that it wouldn't have had if it hadn't allowed building on the Brooklands Ashford campus, it now plans to compound the problem by adding another 1,000 new homes</li> </ul>	

- Section 13.25 recognises the impact of Heathrow on Stanwell and the importance of open land nearby and yet is proposing to release two large areas of Green Belt for development totalling over 6 hectares of greenfield land
- It also lists the following nine Key Challenges for the borough on p.250. The Local Plan doesn't do any of these things properly. It doesn't:
- Ensure we can allocate sufficient land to meet our housing need sustainably, including the provision of affordable homes and the needs of specific communities - it can't allocate sufficient land sustainably given the accepted constraints; it won't provide the promised level of affordable homes AND it won't meet the needs of specific communities
  - Maintain and intensify employment land, anticipating growth in the Borough, including additional growth from an expanded Heathrow Airport - it doesn't anticipate growth from an expanded Heathrow which is still on the cards
  - Plan for the necessary infrastructure, such as schools, roads and healthcare, to support our future population - it DOESN'T plan properly for the necessary infrastructure
  - Protect our valuable open spaces, recreation and leisure facilities and biodiversity sites, including the River Thames and waterbodies - it does very little to protect our valuable open spaces and biodiversity sites
  - Preserve the Green Belt where it is performing well against the purposes it was designated for - it doesn't preserve the Green Belt, not even all the Green Belt sites where the Council admits it is "performing well" (using their bespoke definition) against the designated purposes
  - Enhance the character of our towns and villages, including the vitality of our shopping areas - it doesn't enhance the character of the borough's towns and villages (see the Foreword again)
  - Manage further risk of flooding and prevent or mitigate harm from environmental impacts such as poor air quality and noise pollution - it doesn't have an appropriate flood risk management strategy that I can find and it admits that the Plan will likely produce minor adverse cumulative effects for Flood Risk, Pollution and Water
  - Ensure our Borough has the right amount of social, cultural and community facilities, including opportunities to support the arts - I can find no bigger picture - provision such as it is, seems piecemeal
  - Tackling Climate Emergency for the Borough. The Council's climate change emergency declaration demonstrates our commitment to addressing this major issue for society that hasn't gone away, even with the focus on COVID-19 - the Climate Emergency declaration was in October 2020 - 2 years ago - just stating your commitment repeatedly does not make it true - para 152 of the NPPF calls for "radical reductions in greenhouse gas emissions" - that is what is needed and is one of the major things the Local Plan fails to tackle in its building programme

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618752/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: I do not consider that the voice of residents has been heard.



<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122176</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST1: Presumption in Favour of Sustainable Development	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>II. Regional strategy</p> <p>It would seem that we have been following a certain strategy which can be tracked back nigh on 10 years, possibly since Localism was born in 2011. This hasn't been aired much, in residents eyes at least, but can be seen in the work of the Local Enterprise Partnership, Enterprise M3 or "EM3" (reference to whom crops up in the Local Plan from time to time). Their influence now appears to be waning but our Local Plan, at least 5 years in the making, is very much a product of their Strategic Economic Plans (SEPs), which targeted growth of 4% Gross Value Added to 2030 and has already seen the redevelopment for better or worse of other centres working up the M3 corridor from Basingstoke - in fact I originally found the first EM3 SEP on Basingstoke Council's website dating back to 2014 (see LINK 1, with reference to Staines on p.40 and p.51, and LINK 2).</p>	

I mention EM3's Strategic Economic Plans specifically as they are very much "economic" plans with little to balance them in terms of social and environmental objectives, except for what comes out almost as a by-product. It is a local Enterprise partnership after all so what do you expect, you might say. There should be a counterweight of equal stature however, but the equivalent Local Nature Partnership has been fairly mute, at least in relation to Spelthorne, and has had nowhere near the same level of funding or influence.

From Enterprise M3 we get "Staines as a Step Up Town", "sustainable growth corridor Longcross-Staines-Heathrow" and "Young Urban Residents" - a vision for our future which has barely a mention of affordable housing, biodiversity and climate change.

A couple of quick examples of how short-sighted this vision may appear to be for Spelthorne and what it has already thrown up:

- Surrey CC "consolidating" two fire stations for Spelthorne into one (on Green Belt land) near Fordbridge roundabout when massive development was already on the cards for Staines and emergency services are stretched already.
- The Council overruling an objection from Sports England one moment (in the case of the application for the redevelopment of the Brooklands College site in Ashford), and saying we need sports pitches on the roof of a super duper new Leisure Centre the next (the next moment in strategic planning terms at least).
- The Council saying they rely on suitable sites being put forward (in the case of a sixth form development on Green Belt in Sunbury) when Surrey CC had sold the above-mentioned site in Ashford for housing just a few short years before which would have been a perfect location for a sixth form college the other side of the borough which doesn't have one.
- Surrey CC selling off another site in Staines which they could have developed themselves for health or education (the Oast House and Kingston Rd carpark site including a listed building), only for Spelthorne BC to struggle to make a scheme there viable.

Strategically, Surrey CC (and Spelthorne really) should have known what was coming down the tracks in terms of planned population growth and health and education needs. Or maybe they did (as suggested by the work of EM3 and some of Surrey's and Spelthorne's own documents) and carried on regardless.

1. EM3 SEP 2014-2022 - <https://www.basingstoke.gov.uk/content/doclib/2340.pdf>

2. EM3 SEP 2018-2030 - EM3 Strategic Economic Plan | EM3

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618753/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: I do not consider that the voice of residents has been heard.

<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122200</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST1: Presumption in Favour of Sustainable Development	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>7. Strategy and Strategic Policies - ST1 &amp; ST2</p> <p>The presumption of sustainable development in the NPPF is an honourable one but it has been twisted to the extent that it is often anything but and has, in many cases, turned into some sort of monster. Standing back and looking at Spelthorne, with all its reservoirs and floodplain it feels like it has become a game of how to justify massive overdevelopment.</p> <p>It does not give equal weight to the three overarching objectives of the planning system as laid out in para 8 of the NPPF, namely economic, social and environmental.</p> <p>Furthermore, Spelthorne’s strategy seems inconsistent and unworkable where centralising services to drive efficiencies at the same time as advocating 20 Minute Neighbourhoods, especially when reliant on mostly aspirational, or at least dim and distant, improvements in public transport and local cycling and walking infrastructure.</p> <p>To avoid repetition – please see also my main representation on these two policies which has been submitted by the Riverside Residents (Staines) Coalition.</p>	

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

My main recommendation is that the Council build a strong case for factoring in constraints when determining the housing target as allowed for by the NPPF, para 11 b i including footnote 7:

“b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas<sup>6</sup>, unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area<sup>7</sup>;

<sup>7</sup> The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 181) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 68); and areas at risk of flooding or coastal change.

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618754/PDF/-/Sanders%5F%20Kath%2Epdf>

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Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: I do not consider that the voice of residents has been heard.

<b>Respondent: Mrs Kath Sanders (19813377)</b>
<b>Organisation:</b>

<b>Response ID: 1122181</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
<p>III. "Good growth" - a paradigm shift</p> <p>To paraphrase Cllr Karen Randolph from Elmbridge Council in the debate on "good growth" at the Surrey Development Forum's Inaugural Conference in November 2021 (see LINK 3, Session 1 from around 50 mins in), times are changing and our priorities need to shift - economic growth alone is not enough and with strategic planning's time horizons stretching 15, 30, even 50 years and more (in terms of buildings and flood risk at least), radical change is needed (as the NPPF makes clear in terms of carbon emissions in para 152 as does the government's Sixth Carbon Budget). We need much more of a balance, a circular economy if you like, considering the impact of climate change, the value of natural capital and the importance of biodiversity for human health and wellbeing as much as anything else (see LINK 4). What will our communities look like in 2050? What will our children inherit?</p> <p>Para 7, NPPF (July 2021) – "At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs."</p>

Spelthorne BC can't solve this problem, but they can do a lot more to mitigate and adapt for the benefit of current and future residents, as the NPPF calls for in para 153, and which is the thrust of the UK GBC's 'New Homes Policy Playbook', referenced by the Council in their Key Evidence to Policy PS1 'Responding to the Climate Emergency'- see LINK 5. It would appear that the Council have dipped its toes in the water and included one or two of the UK GBC's minimum recommendations (but by no means all) which the UK GBC argues all Local Authorities can and should introduce now. Similarly, I don't believe the Council have taken the threat posed by flooding seriously enough. The current 'Strategic Land Availability Assessment' (SLAA) still seriously underplays this and the current 'Strategic Land Availability Assessment Methodology' shows that the SLAA is seriously out of date.

5. UK GBC New Homes Policy Playbook - <https://www.ukgbc.org/ukgbc-work/new-homes-policy-playbook/>

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

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Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618734/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Kath Sanders (19813377)</b>
<b>Organisation:</b>

<b>Response ID: 1122192</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
<p>IV. A hint of things to come</p> <p>The document signed by Councillor Harvey (then Leader) on behalf of Spelthorne BC in December 2017 is amongst the Duty to Cooperate documentation on the Council website (see LINK 6). It is entitled the Interim Local Strategic Statement (LSS) for Surrey 2016-2031 and explains much. The Local Plan proposals which we see now haven't come from nowhere - they have been informed by a lot of work (misguided some might say but work nonetheless) over many years. Honesty and clear communication have been what's missing, as if residents can't be trusted with the information and don't know what's good for them.</p> <p>Cracks started to appear in the strategy and reality kicked in when the Council published the original plan to build the new Spelthorne Leisure Centre on Staines Park (with vehicular access seemingly from Commercial Road, unrealistic in itself). This appeared to be the start of the plan to redevelop the whole of Knowle Green, mention of which I'd seen in EM3's first SEP from 2014 in their Staines case study. On paper it may have looked okay but any local could see that it was a bad idea and made no sense, even before climate change and flood risk had made it onto Spelthorne Council's (or even Surrey CC's) agenda. Only after thousands mobilised to save the park, did the Council rethink.</p>



However, the Council seemed to have just carried on regardless through Covid-19 and all the political turmoil, attempting to stick to broadly the same strategy glossing over any cracks along the way, blaming delays and spiralling costs on others. It's relentless and exhausting. Countless consultations have been generally geared to get the answers required and when they don't like the answers, they ignore them. For example:

- The response by Cllr Nichols (then a humble resident) to the SHMA 2015 consultation, p.64-69, where he starts by saying "This document constitutes probably the most serious threat to the quality of life in Spelthorne on record. It proposes that the overall level of housing stock should be increased by 25%. Given that the existing Spelthorne Plan includes the fact that 65% of the Borough is Green Belt, it is impossible to believe this level of change would not fundamentally alter the character of the area. This is not something that local people want or would regard as acceptable."
- the Staines Town Centre Development Framework "Objectives and Options" consultation in June 2021 – results largely ignored
- the Staines Development Framework consultation this summer (2022) – residents' views misrepresented A robust residents' survey, just published and which has over 600 signatories (mostly from Staines residents but not exclusively), gives a much better representation of residents' views.

At what point does Spelthorne get a proper chance to pause, reflect and realign, as recommended by a local government peer review late in 2020 and subsequently promised by the moratorium on development in Staines which started in January 2021 and which ended in acrimony? (See link 7 for original Staines Moratorium decision.)

Fast forward five years from the Interim LSS 2016 and we now have the Surrey Development Forum (does just what it says on the tin) and Surrey 2050 Place Ambition. How things will develop on a Surrey-wide basis with shifting government priorities and local government responsibilities is less clear. One thing is clear - infrastructure is already creaking and funding large infrastructure projects locally will become even more challenging not to mention expensive.

6. Spelthorne Duty to Cooperate - Duty to Cooperate - Spelthorne Borough Council

7. Decision to agree moratorium for Staines, January 2021 - <https://democracy.spelthorne.gov.uk/ieDecisionDetails.aspx?AId=12496>.

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No Response

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618735/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122194</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>A REALISTIC view of where we are now (a reliable baseline), where we want to get to (objectives along with a reasonable idea of what’s missing i.e. a “gap analysis”) and how we’re going to get there (a delivery plan with proper targets and checkpoints along the way) is what’s needed and that is patently missing from the plans currently in front of us. It is also a requirement of strategic policies under para 20 of the National Planning Policy Framework (NPPF), July 2021 to make “sufficient provision for infrastructure”. It states:</p> <p>“Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:</p> <ul style="list-style-type: none"> <li>a) housing (including affordable housing), employment, retail, leisure and other commercial development;</li> <li>b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);</li> <li>c) community facilities (such as health, education and cultural infrastructure); and</li> <li>d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”</li> </ul>	

Let's not start something we can't finish. Everybody surely wants a whole plan that's properly deliverable, not just housing with vague promises of infrastructure going back years which, in many cases, we're still waiting for.

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No Response

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Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618736/PDF/-/Sanders%5F%20Kath%2Epdf>

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Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Kath Sanders (19813377)</b>
<b>Organisation:</b>

<b>Response ID: 1122195</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
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<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
V. The least worst option The Local Plan together with its Evidence Base comes across like a fabrication, with foregone conclusions where some continue to insist it will all work on paper at least, regardless of what is happening in the real world - lots more flats with a bit, possibly a lot, less affordable housing than we'd like maybe but a few more flood risk measures and a bit less carbon if the Council are to be believed; a bit less Green Belt but what we get to keep will be better and better protected we're assured; no more Protected Urban Open Spaces but a few smaller Local Green Spaces; a few less trees but more Biodiversity Net Gain with a bit of luck and a fair wind. We have no option it would seem but to keep jumping through ever smaller hoops and building ever-taller high-rises (on floodplain) - there is no reasonable alternative, we're told. The government "housing need" figure is, "for all practical purposes a rigid target", we're told. 618 dwellings per annum (dpa) for 15 years represents a near fourfold increase on the 166 dpa set in 2009 and the infrastructure has not kept pace even with the lower figure (see below).

Well done and thank you to those officers and Members, past and present, who have tried to point out the obvious problems with the strategy and have genuinely tried to engage in a constructive way. However, many have been shouted down, bullied into submission or been otherwise persuaded that Spelthorne simply has no choice. This apparently is the least worst option.

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No Response

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<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618737/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Kath Sanders (19813377)</b>
<b>Organisation:</b>

<b>Response ID: 1122201</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
<p>7. Strategy and Strategic Policies - ST1 &amp; ST2</p> <p>The presumption of sustainable development in the NPPF is an honourable one but it has been twisted to the extent that it is often anything but and has, in many cases, turned into some sort of monster. Standing back and looking at Spelthorne, with all its reservoirs and floodplain it feels like it has become a game of how to justify massive overdevelopment.</p> <p>It does not give equal weight to the three overarching objectives of the planning system as laid out in para 8 of the NPPF, namely economic, social and environmental.</p> <p>Furthermore, Spelthorne’s strategy seems inconsistent and unworkable where centralising services to drive efficiencies at the same time as advocating 20 Minute Neighbourhoods, especially when reliant on mostly aspirational, or at least dim and distant, improvements in public transport and local cycling and walking infrastructure.</p> <p>To avoid repetition – please see also my main representation on these two policies which has been submitted by the Riverside Residents (Staines) Coalition.</p>

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

My main recommendation is that the Council build a strong case for factoring in constraints when determining the housing target as allowed for by the NPPF, para 11 b i including footnote 7:

“b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas<sup>6</sup>, unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area<sup>7</sup>;

<sup>7</sup> The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 181) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 68); and areas at risk of flooding or coastal change.

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618738/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1125936</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: no NOT JUSTIFIED NOT EFFECTIVE INCONSISTENT WITH NATIONAL POLICY
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: no NOT JUSTIFIED NOT EFFECTIVE INCONSISTENT WITH NATIONAL POLICY
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: no
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
19. Conclusions	

The Council maintain that this is a sound plan and is the best they can do. They also maintain that they have listened to residents and generally have their backing - they can sugar coat this as much as they like but the reality is different. The Council's methods of consultation have not been effective. You can ask lots of residents.

As reflected in all the above, the Plan and the whole Evidence Base are pretty impenetrable to the lay reader - the summaries are inconsistent and much of the detail has been provided late and not in an orderly way making the process of review all the more difficult even to those who are inclined to look at the 1000's of pages. This goes clearly against the Council's Statement of Community Involvement.

It's taken a while to see the wood from the trees, but I've reached a different set of conclusions to those reached by the Council.

It's not a SOUND Plan:

- NOT JUSTIFIED - the Evidence Base is not proportionate and has not been provided in a timely way for Members and other stakeholders to make a considered judgement (in April, in May or in June)
- NOT JUSTIFIED - the Local Plan does not represent an appropriate strategy given the waterbodies and high level of flood risk in the borough (from all sources) and the strategic availability of land
- NOT JUSTIFIED - the Local Plan does not represent an appropriate strategy given the high degree of Green Belt in the borough AND given its agreed continuing strategic importance by national policy and Spelthorne Borough Council
- NOT JUSTIFIED - the Local Plan does not represent an appropriate strategy in respect of Climate Change adaptation and mitigation, notably in terms of carbon emissions, water supply & pollution (and flood risk mentioned previously)
- NOT JUSTIFIED - the Local Plan has not taken in reasonable alternatives such as the approach taken in the Strategic Highways Assessment Report of taking "Do Minimum" as a baseline - the Council did however at one point briefly consider the alternative of doing nothing which was (obviously) completely UNreasonable
- NOT EFFECTIVE - Engagement with other LPAs and with Surrey County Council has not been effective in terms of joint working on strategic matters such as housing (widening gaps in approach versus Elmbridge CC and Runnymede CC), flooding (matters deferred with regard to flood risk management and emergency planning) and infrastructure (matters not dealt with and deferred with regard to transport, emergency services provision & education)
- INCONSISTENT WITH NATIONAL POLICY - in a myriad of ways

Spelthorne's Local Plan, as it currently stands, will NOT enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework OR, for that matter, the UN's Sustainable Development Goals THE 17 GOALS | Sustainable Development.

Spelthorne's Local Plan, as it currently stands, tramples all over residents' views (or, in the case of Staines, simply puts a tower block in the way to obstruct it). There have been many, many chances to change direction, engage effectively with residents (and ultimately save money and get on with things). But for the dogged determination of the Council to stick with their original strategy.

The Plan is unworkable and won't deliver the holy grail of affordable housing, happy families and a healthy environment in which to live, work and play. A bit of honesty from the Council as to their intentions and the transformational growth opportunities as the gateway to Heathrow would add useful

context e.g. aspirations for a Southern Light Rail to Heathrow from central Staines. It would go a long way to explaining the direction of travel and residents could then make more informed judgements.

Given the degree of inconsistencies between documents and contradictions throughout the Sustainability Appraisal, Local Plan, SDF and wider evidence base, it's hard to see how a few major modifications and a host of minor modifications can rescue it. Where that leaves us is unclear. However, to accept the plan as it is does a grave disservice to the thousands of residents whose lives and future happiness depend on it.

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618739/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: yes

<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122198</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>VI. Getting our priorities right - the impact of Climate Change (more below)</p> <p>Accepting the threat posed by Climate Change started off as a reluctant afterthought, belatedly added to plans, now rocketing up the agenda in the real world but still a bit slow to catch on at the Council. As late as May 2022 (after the Council meeting to agree the Local Plan), someone seemingly had the bright idea to change where the policy featured in the Pre-Submission version (from a principally “sustainable design”-led policy (DS2) to a “place shaping” policy (PS1)) - other policies were also shuffled round (e.g. E2/E3/E4).</p> <p>Not a bad idea except everything else was still geared to the old classification. So we have the slightly ridiculous situation where its thrown most of the other documents out of synch and there are still 55 references to the old policy in the current version of the local plan. This has to last for at least 5 years and withstand scrutiny as will the evidence base.</p>	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	

Modification (minor?): A few quick and simple 'global' changes in the main document will correct the document itself but it might be easier to add some notes for others to be able to navigate their way through pretty much every other document. This might be more appropriate as an alternative to the much longer job of updating everything else - even the Sustainability Appraisal - apart from where those documents need updating for other reasons maybe!

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618771/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122254</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
10. Responding to the Climate Emergency - PS1 (old DS2) To avoid repetition – please see also my main representation on Policy PS1 which has been submitted by the Riverside Residents (Staines) Coalition. My main recommendation is that this should be given much greater focus and much greater weight.	
<b>Question 6:</b> You can upload any modifications below.	
Sanders, Kath.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618770/PDF/-/Sanders%5F%20Kath%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618770/PDF/-/Sanders%5F%20Kath%2Epdf</a>	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1111722</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS3: Heritage, Conservation and Landscape	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	
<b>Question 6:</b> You can upload any modifications below.	
Sanders, Kath.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618741/PDF/-/Sanders%5F%20Kath%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618741/PDF/-/Sanders%5F%20Kath%2Epdf</a>	



**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Kath Sanders (19813377)</b>
<b>Organisation:</b>

<b>Response ID: 1111777</b>	
<b>Policy / Evidence Base / Part of Plan: Policy SP1: Staines-upon-Thames</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: I don't consider Policy SP1 'Staines-upon-Thames' to be legally compliant.
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: I don't consider Policy SP1 'Staines-upon-Thames' to be sound.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No	Additional Comments: I have said "No" as there is no option to put unsure. I am not a lawyer but it appears there might have been failures of co-operation on strategic matters in discussions relating to housing, transport and the delivery of other necessary infrastructure. I
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>The issue of flood risk has not been properly considered when strategically assessing the availability, suitability and viability of sites and the cumulative impact of flooding and climate change.</p> <p>Many of the key relevant documents are missing bits, are inconsistent and/or were published late.</p> <p>Over and above issues regarding the SLAA (mentioned elsewhere):</p> <ul style="list-style-type: none"> <li>* The Sequential Test for the Local Plan overall is not clearly documented and transparent as the Level 1 SFRA makes clear it should be.</li> <li>* The Level 2 SFRA (published 26<sup>th</sup> July 2022) is inconsistent with earlier site assessments (and does not consider cumulative impact as this should have been done already following the Level 1 SFRA in the afore-mentioned Sequential Test). It also appears to be incomplete inasmuch as some sites in Staines do not feature in the final analysis despite being near neighbours of sites that do (e.g. ST4/023 Two Rivers, ST4/024 Frankie and Benny's, ST4/026 Communications House. ST4/028 William Hill, ST2/006 Builders Year (Gresham Rd)).</li> </ul>	

- \* The Viability Assessment (published 25<sup>th</sup> July 2022) has assessed 5 sites in Staines as “non-viable” under a range of scenarios (ST4/019 Former Debenhams, ST3/014 Birch House, ST4/011 Thames Lodge, ST4/024 Frankie and Benny’s, ST4/009 The Elmsleigh Centre). Even if they can be made viable this is likely to significantly compromise the level of affordable housing they can support, supposedly a key part of the strategy which will be undermined.
- \* The strategy of encouraging Twenty Minute Neighbourhoods conflicts massively with the reality of centralised services e.g. the proposed Health and Wellbeing Hub and new Spelthorne Leisure Centre. Both are huge ‘trip attractors’ with only aspirational plans for sustainable transport improvements.
- \* Accessibility will be a huge issue in a reimagined Staines of the future, especially for those with additional needs. It will be further compromised where sites are already struggling to be proved ‘viable’ or under sufficient risk of flooding to exempt them from certain accessibility standards (including provisions under the government’s “optional technical standards”).
- \* Infrastructure delivery plans are sketchy at best and are not supported by the evidence base so far provided.
- \* Climate change is not addressed appropriately in terms of seeking “radical” reductions in emissions.
- \* Additional open space will be barely increased in real terms and per person will reduce further with the proposed increase in population.
- \* Transport plans seem to largely depend on reducing traffic through the town but there is no credible plan on the table for doing this other than making it more painful and constricted. Putting the only decent parking option for the Oast House & Kingston Road Car Park development on the town centre side of the railway will not help this.
- \* Phasing of development makes little sense with the key piece planned to come last rather than first as it should be (national guidance in any event suggests that for a major town centre redevelopment the timeframe is more likely to be 30 years). The potential redevelopment of the bus centre is linked to this (The Elmsleigh Centre) and would mean the resultant public transport improvements, if they came at all, would come at the end and not help the shift to sustainable transport modes in the meantime. FYI Spelthorne’s LCWIP was published too late to feature in this review, coming as it did at the end of August (and its still not showing on the Evidence Base).
- \* The river and its tributaries will not be properly protected under plans as they stand, let alone enhanced in the way the EA and the Level 2 SFRA recommends.
- \* The character of the town will be sacrificed seemingly for the greater good - whose good?

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

It is hard to see how Policy SP1 ‘Staines-upon-Thames’ can be modified sufficiently but a few of the main items are below. Ideally, a properly documented Sequential Test is required for the whole Local Plan to first understand the levels of development which can realistically and sustainably be supported by each area, and of which type. I would suggest its markedly less than over 5,000 new homes in Staines. This leads back round to the overall view of what the overall constraints on the borough are in terms of meeting local needs which I will pick up elsewhere. Thereafter, site assessments should be reviewed in light of the (late published) Level 2 SFRA and the conclusions of the (late published) Viability Assessment which should inform the SLAA (but currently don’t).

Ultimately, it would seem that the Sustainability Appraisal (SA) has final say in terms of balancing all the different objectives for the borough as a whole. This too needs reviewing in light of the Level 2 SFRA and Viability Assessment. NB There are also some inconsistencies in the SA which need ironing out especially with regards to 'minor adverse cumulative effects of all proposals in the Draft Local Plan' which I will pick up elsewhere.

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618747/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: I do not consider that the voice of residents has been heard.

<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122145</b>	
<b>Policy / Evidence Base / Part of Plan: Policy SP1: Staines-upon-Thames</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>13. Staines-upon-Thames - SP1 and the SDF</p> <p>I don't consider Policy SP1 to be legally compliant or sound.</p> <p>I have completed the online questionnaire but in summary:</p> <ul style="list-style-type: none"> <li>• The issue of flood risk has not been properly considered when strategically assessing the availability, suitability and viability of sites and the cumulative impact of flooding and climate change.</li> <li>• Many of the key relevant documents are missing bits, are inconsistent and/or were published late.</li> </ul> <p>Some of my main recommendations are:</p>	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
MOD 1: that a properly documented Sequential Test is published for the whole Local Plan and development constraints by area are reviewed	
MOD 2: that site assessments in Staines should be reviewed in light of the detail in the Level 2 SFRA and the Viability Assessment	

MOD 3: that the Sustainability Appraisal be reviewed in light of any cumulative effects on Staines  
Please also see SDF consultation response attached (Appendix 3).

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618748/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1125949</b>	
<b>Policy / Evidence Base / Part of Plan: Policy SP1: Staines-upon-Thames</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: no
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: no
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
<p>13. Staines-upon-Thames - SP1 and the SDF</p> <p>I don't consider Policy SP1 to be legally compliant or sound.</p> <p>I have completed the online questionnaire but in summary:</p> <ul style="list-style-type: none"> <li>• The issue of flood risk has not been properly considered when strategically assessing the availability, suitability and viability of sites and the cumulative impact of flooding and climate change.</li> <li>• Many of the key relevant documents are missing bits, are inconsistent and/or were published late.</li> </ul> <p>Some of my main recommendations are:</p> <p>MOD 1: that a properly documented Sequential Test is published for the whole Local Plan and development constraints by area are reviewed</p>	

MOD 2: that site assessments in Staines should be reviewed in light of the detail in the Level 2 SFRA and the Viability Assessment  
MOD 3: that the Sustainability Appraisal be reviewed in light of any cumulative effects on Staines  
Please also see SDF consultation response attached (Appendix 3).

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618749/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: yes



<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117319</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy SP6: River Thames and its Tributaries	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Part 9 d) "Provide undeveloped buffer zones of 8m minimum for rivers" comes just under "Tributaries". The EA in their Preferred Options response and the Level 1 SFRA under Section 5.9 requires an 8m undeveloped buffer strip alongside main rivers. Therefore Part 9 d) should also relate to the River Thames section further up the policy. To save any ambiguity, Part 9 d) should be copied above so the policy is clear for the River Thames too.	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
To save any ambiguity and to make it consistent with the recommendation from the EA and Level 1 SFRA, Part 9 d) should be copied above so the policy is clear for the River Thames too.	
<b>Question 6:</b> You can upload any modifications below.	
Sanders, Kath.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618745/PDF/-/Sanders%5F%20Kath%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618745/PDF/-/Sanders%5F%20Kath%2Epdf</a>	

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<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: Yes, I wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: I do not consider that the voice of residents has been heard (& listened to).

<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122249</b>	
<b>Policy / Evidence Base / Part of Plan: Policy H1: Homes for All</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>Policy H1: Accessible Homes  In Part 9) accessible homes there is an exclusion linked with flood risk  The SDF allocations (just in town centre study area) equates to approx. 3,500 homes and as it stands, the Level 2 SFRA says most sites in Staines cannot have residential development on ground floor.  If the exclusion in Part 9 is allowed to stand that's potentially no accessible homes in developments accounting for over one third of total planned housing in the borough!</p>	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
The Council undertakes to recognise needs of community in it's Policy H1 'Homes for All'. The Council ideally needs to find ways to accommodate ALL sections of the community and ideally take out the exclusion or at least adapt it to say that any shortfall in the requirement is made up elsewhere.	

My main specific recommendations are that the exemptions provided for under Policy H1, Part 9 (in relation to financial viability and flood risk), be removed and that the conditions listed under Part 8 be tightened.

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618733/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Kath Sanders (19813377)</b>
<b>Organisation:</b>

<b>Response ID: 1122257</b>
<b>Policy / Evidence Base / Part of Plan: Policy E2: Biodiversity</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
<p>12. Biodiversity - E2 / HRA</p> <p>Much more needs to be done to ensure E2 is sound and legally compliant:</p> <ul style="list-style-type: none"> <li>• The Evidence Base for Policy E2 is incomplete as the reference to a Biodiversity Action Plan has been removed.</li> <li>• The Monitoring Indicators do not correspond to those in the SA Monitoring Framework.</li> <li>• The Key Evidence is out of date (Surrey Nature Partnership updated their report in September 2019).</li> </ul> <p>There is a dearth of up-to-date biodiversity information at both the Spelthorne and Surrey level. This points to a serious weakness in Spelthorne’s Local Plan and overall, one gets the sense that it’s just not important enough.</p> <p>The Habitats Regulations Assessment (HRA) was only published on 17<sup>th</sup> August 2022 leading to a 2-week extension of the Regulation 19 consultation from 5<sup>th</sup> September to 19<sup>th</sup> September (now 21<sup>st</sup> September) - legal advice was sought by the Council to confirm that a full six weeks was not required on a statutory basis from publication date to the consultation closing.</p>

Furthermore, the HRA Stage 1 indicated that a HRA Stage 2 (“Appropriate Assessment”) would be required and this is still forthcoming. There is no current Spelthorne Biodiversity Action Plan (and the Surrey BAP has apparently also lapsed). One was referenced in two policies in the version of the Local Plan which went before Council on 19<sup>th</sup> May 2022 so it appeared there was a chance one would be published; however, those references were lost in the 15<sup>th</sup> June Pre-Submission Version of the Local Plan published for Regulation 19 consultation.

Incidentally, reference is still made in the SA/SEA Scoping Report Update (published in June 2022 on the Evidence Base) to Spelthorne’s original Biodiversity Action Plan, issued in 2008, although the link is broken and the document is no longer available on Spelthorne’s website. There are only 5 Site of Nature Conservation Interest (SNCI) reports on the online Evidence Base (dated 2019 although not actually published on the Evidence Base until March 2022). These are not referenced anywhere directly in the Local Plan. these are not specifically referred to in the Local Plan - however, the borough has 26 SNCIs (and 4 SSSIs) and the Council did commit to reviewing 13 SNCIs as late as the Annual Authority Monitoring Report 2021 - see para 8.19 “As part of the new Local Plan preparation, Surrey Wildlife Trust has been undertaking a review of thirteen of the SNCIs within the Borough.”

Therefore, the Council is obviously still waiting on a number of additional reports (at least 8) which have apparently not yet been forthcoming Biodiversity Opportunity Areas (BOAs) are referenced in Policy E2, in Key Evidence (on p. 87) and on the Policies Map but do not appear in the Monitoring Indicators for E2. NB The SA/SEA Scoping Report Update (June 2022) also references a third BOA – the River Thames (R06), see para 3.140 (p.66).

This report raises two issues - the issue of soundness and the issue of legal compliance.

Legal Compliance - the correct process has not been followed

- the Council did not provide the HRA evidence for the beginning of what they themselves called the start of the Regulation 19 consultation phase on 15<sup>th</sup> June 2022
- the Council did not allow for the full 6 weeks statutory consultation following the provision of the HRA Stage 1 report on 17<sup>th</sup> August 2022, stating that they had taken legal advice to confirm that the full 6 weeks was unnecessary
- Key Evidence on Biodiversity is still missing in terms of the recommended HRA Stage 2 (Appropriate Assessment) • Key Evidence in terms of Spelthorne’s Biodiversity Action Plan (or, failing that, the remaining SNCI reports) has not been provided.

Soundness – I don’t believe Policy E2 is justified, effective or consistent with national policy

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

Some of my main recommendations are:

MOD 1: Produce a HRA Stage 2 Appropriate Assessment or provide evidence that one is not required

MOD 2: Complete the Evidence Base by either providing a new BAP or updating the rest of the SNCI reports

MOD 3: Update the Monitoring Indicators to comply with the Monitoring Framework

MOD 4: Update the references in the Key Evidence

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122255</b>	
<b>Policy / Evidence Base / Part of Plan: Policy E3: Managing Flood Risk</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
11. Managing Flood Risk - E3 / Level 1 SFRA / Level 2 SFRA Much more needs to be done for Policy E3 to be sound and legally compliant in terms of:	
<ul style="list-style-type: none"> <li>• Assessing the risk</li> <li>• Avoiding the risk</li> <li>• Mitigating and adapting to the risk</li> </ul>	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
To avoid repetition – please see also my main representation on Policy E3 which has been submitted by the Riverside Residents (Staines) Coalition. My main recommendations are: MOD 1: that this very obvious constraint on development should be treated as such at a strategic level	



MOD 2: that any site allocations at risk of flooding should only be developed in accordance with a well-developed flood risk management strategy and that this is evidenced

MOD 3: that a proper Strategic Flood Risk Management Plan is shown to give due weight to the concerns and recommendations of the disaster & emergency planning staff

MOD4: that proper guidance is offered to developers regarding the provision of mass evacuation plans so everyone knows what is required (as opposed to reference to the government's personal flood plan)

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618746/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Kath Sanders (19813377)</b>
<b>Organisation:</b>

<b>Response ID: 1117013</b>
<b>Policy / Evidence Base / Part of Plan: Policy E5: Open Space and Recreation</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No   Additional Comments: I don't consider Policy E5 to be legally compliant.
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: I don't consider Policy E5 to be sound.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not consistent with national policy
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
<p>EXISTING OPEN SPACE</p> <p>Part 2b) of Policy E5 states:</p> <p>"b) The benefit of the development to the community outweighs the harm caused by the loss of the facility"</p> <p>The NPPF (July 2021), para 99c) states that the development needs to be specifically "for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use". This should be specified in Part 2b) to comply with the NPPF (and so we don't inadvertently lose more sports and recreational provision).</p> <p>LOCAL GREEN SPACE</p> <p>In their assessment, the Council have discounted a number of sites which were previously designated as PUOS or were put forward as part of the call for green sites. This has been done in a way which is inconsistent with national policy as they have specifically excluded school playing fields (mentioned in NPPF (July 2021), para 102 b)), allotments, private sports grounds and a number of other sites, by virtue of them being physically inaccessible to the public at large. This is not a requirement under the NPPF (or PPG) and those sites should not have been discounted on that basis - they can still provide</p>

opportunities for sport and physical activity (NPPF, para 98); they can still deliver wider benefits for nature (NPPF, para 98); and people can still derive benefit whether it be because of its beauty, historic significance, tranquility or richness of its wildlife (para 102 b). It might further be helpful if para 7.65 could be made consistent with NPPF (July 2021), para 102 as it represents the criteria under which the assessment should have been done and may avoid further challenge down the line.

Separately, the Council have discounted a number of Green Belt sites from the review on the basis that they are protected under Green Belt policy. However, the PPG recognises that land can be designated for different purposes at the same time - see PPG, para 011 <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space> . This acts as further protection if one form of protection wanes (as is the case with Green Belt protection it would seem).

In terms of a technicality, the Council does also say in its 2019 LGS Assessment Methodology, para 1.10: “1.10 In addition to this, Q5 of the consultation document requested responders to suggest sites that should be considered for the LGS designation. A total of 94 responses to this question were received and the sites put forward through this process will also be assessed against the criteria to determine if they should be considered suitable for the LGS designation.”

Per the LGS Review document, dated January 2022 but only published on 26<sup>th</sup> April 2022, these have not been included in the review. It is unclear how many of those 94 responses were duplicates of those put forward in 2021, but these should also have been reviewed, given that people were consulted and put forward suggestions then too.

A final note on the Council’s Statement of Community Involvement (SCI) from November 2021 with regard to the LGS review process. The LGS review took place in Oct/Nov 2021 and the report was seemingly finished in January 2022. However, the review was not published until 26<sup>th</sup> April 2022, the day of the Environment and Sustainability Committee meeting to recommend the Local Plan move to Regulation 19. Residents were not told if their applications had been successful and there was no publication of its findings to the wider community despite the publicity at the start of the consultation and the public interest in it. This is the first opportunity for residents to comment on the results of the review and therefore, in the interests of fairness, there should be an opportunity for additional changes to be made (see SCI, paras 1.2, 1.9 and 1.10).

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

MOD 1: To be consistent with the NPPF (para 99c), Part 2b) of Policy E5 should read:  
b) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use”

MOD 2: To be consistent with the NPPF (paras 98 and para 102b), sites which were excluded from review by virtue of their perceived non-accessibility and/or by virtue of them being a playing field, should be included in the review.

MOD3: Furthermore, for para 7.65 of the Local Plan to be consistent with the NPPF (para 102), it should read:  
“The NPPF allows for the designation of land as Local Green Space (LGS) through the preparation of the Local Plan. The designation is suitable where the green space is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance,

recreational value (including as a playing field), tranquility or richness of its wildlife. The Council has undertaken an assessment to identify potential Local Green Space (LGS) in consultation with the local community.”

MOD 4: To be consistent with the PPG on ‘Open space, sports and recreation facilities, public rights of way and local green space’, para 011, Green Belt sites proposed for LGS status should be reviewed on a case by case basis to determine whether they merit inclusion as Local Green Space under LGS criteria. Considering that Green Belt designation is very specific and Spelthorne Borough Council is planning a change in strategy to release certain parcels of Green Belt which they say aren’t performing their Green Belt function, this would be an appropriate response.

MOD 5: To be consistent with its own LGS Assessment Methodology and be consistent with its Statement of Community Involvement in terms of meeting its obligations with respect to fairness (para 1.2), the Council should go back and review the 94 responses to Q5 of the Issues and Options consultation to determine whether there are any additional sites contained therein which merit inclusion as Local Green Space.

Also see answer to Question 4 for further comments on rationale.

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618768/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: I do not consider that the voice of residents has been heard (and listened to)

<b>Respondent: Mrs Kath Sanders (19813377)</b>
<b>Organisation:</b>

<b>Response ID: 1122250</b>
<b>Policy / Evidence Base / Part of Plan: Policy ID1: Infrastructure and Delivery</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
<p>9. Infrastructure and Delivery - ID1 / ID2 and IDP Parts 1 &amp; 2</p> <p>Much more needs to be done to ensure policies ID1 / ID2 are sound and legally compliant. As it stands this part of the plan is not justified by the Evidence Base and is not effective.</p> <p>The Infrastructure Delivery Plan (Part 1) was first published only on 26<sup>th</sup> April 2022. As such, one could maybe assume it would be relatively complete and up-to-date having been in development for a couple of years. However, it is sadly lacking essential detail and many parts are already out-of-date. There is no overview and no conclusions to speak of apart from two short paragraphs at the end of the last chapter. The IDP Part 2, first published on 10<sup>th</sup> May 2022, offers only partial information and no overview.</p> <p>To quote Chapter 9 of the Local Plan (Sections 9.1 and 9.2):</p> <ul style="list-style-type: none"> <li>• “infrastructure provision is a key element in the delivery of a Local Plan”</li> <li>• “The Council is required to identify the infrastructure needed to support the development proposed over the next 15 years. This is done through the Infrastructure Delivery Plan (IDP).”</li> </ul>

• “The IDP outlines any potential gaps in provision and identifies what new infrastructure is required to mitigate some of the potential effects of the levels of development being proposed. This, together with the policies[sic] in the Plan, sets out how the needs of the Borough will be met over the plan period.”

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618769/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1116288</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ID2: Sustainable Transport for New Developments	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	
<b>Question 6:</b> You can upload any modifications below.	
Sanders, Kath.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618744/PDF/-/Sanders%5F%20Kath%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618744/PDF/-/Sanders%5F%20Kath%2Epdf</a>	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1116588</b>	
<b>Policy / Evidence Base / Part of Plan: ST3/004 (Oast House, Kingston Road)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: I don't consider residential allocation ST3/004 to be legally compliant as some of the related evidence has been collected retrospectively. The Strategic Flood Risk Assessment Level 2 and Viability Assessment were only completed and published in July 202
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: I don't consider site allocation ST3/004 to be sound as it is not justified or effective*. * I could only tick one box in Q2a. ST3/004 is not part of an appropriate strategy based on the evidence and is not deliverable in its current form when properly
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: Have replied "Yes" as no option to say "don't know" although not really sure on a site-specific basis. See main submission.
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
I don't consider residential allocation ST3/004 to be legally compliant as some of the related evidence has been collected retrospectively. (continued from Q1) Evidence for allocation ST3/004 was collected retrospectively and demonstrates that the LPA has not followed a logical and consistent method.	

See link on evidential requirements (para 1.10 & 1.11 on “What is an adequate evidence base?”) -

<https://www.gov.uk/government/publications/examining-localplans-procedural-practice/procedure-guide-for-local-plan-examinations>

I don't consider site allocation ST3/004 to be sound as it is not justified or effective.

(continued from Q2)

One of the main areas which hasn't been properly considered is flood risk.

a) Neither the Local Plan site allocation summary on p.162/163 nor the detailed site allocation assessment (Stage 2b on p.292) are consistent with the findings of the Level 2 SFRA for ST3/004.

As noted above, the Level 2 SFRA was completed in July 2022 AFTER publication of the Pre-Submission version of the Local Plan. The Level 2 SFRA (Appendix B) flags a number of site-specific issues and constraints for ST3/004.

It does not appear that Stage 2b of the site allocation assessment for ST3/004 has reflected ALL the site-specific issues and constraints identified by the Level 2 SFRA. Nor are they reflected in the Local Plan site allocation summary for ST3/004 which makes no reference to Policy E3 and incorporating flood risk mitigation measures (although 4 other sites in Staines town centre do\*).

\*erroneously referenced as E2 but they mean E3

b) It does not appear that the viability assessment completed in July 2022 builds in any allowance for flood risk mitigation and adaption in its broad assumptions generally, especially important in relation to sites in Staines, nor does it claim to. As such, it is even more important that this is done at the detailed site allocation assessment (Stage 2b).

The Viability Assessment was completed in July 2022 AFTER publication of the Pre-Submission version of the Local Plan. It does not list any assumptions for flood risk mitigation in its Appendix I to its Final Report July 2022. Nor does it claim to consider flood risk and potential mitigation in the main report specifically – see sections 2.9 and 2.10 (p.42-25), 'Development Costs – Generally' and 'Development Costs – Build Costs'.

There is a contingency allowance although it says this is dependent on the type and scale of site modelled (para 2.9.1).

Para 2.9.4: “For site typology testing, we have not allowed for abnormal costs that may be associated with particular sites - these are highly specific and can distort comparisons at this level of review. Contingency allowances have however been made for all appraisals at varying level dependent on the perceived uncertainty relating to any given site tested.”

It is unclear from the detail available as to how the above-mentioned site-specific contingency allowances were determined exactly. However, it does say in para 7.2 of Appendix III 'Market Values and Assumptions Research' that Benchmark Land Values should reflect specific viability influencing factors such as development constraints. In para 7.2.1 the Viability Assessment (Appendix III) defines development constraints as “including site conditions and necessary works, costs and obligations (including known abnormal factors)”. Presumably this WOULD or at least SHOULD include known flood risk factors.

Given that the whole Viability Assessment was only published on 25<sup>th</sup> July 2022, this is the first opportunity for it to be consulted on and clarification is required as to how the Viability Assessment has handled the whole issue of flood risk.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

To go some way towards making ST3/004 legally compliant, the stages of assessment need to be redone in the right order with the latest available evidence.

To go some way towards making ST3/004 sound with regard to flood risk:

a) Review the Local Plan allocation and Stage 2b of the site allocation assessment for ST3/004 in light of ALL Site-Specific Issues and Constraints identified in the Level 2 Strategic Risk Assessment (Appendix B) as follows:

“More Vulnerable development is permitted in Flood Zones 1 and 2, and the Exception Test is not required. A site specific FRA will be required to demonstrate that the proposed development will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall. Given that parts of the site and access to the site are at risk of flooding during the 1% AEP event including climate change, the following recommendations are made:

Apply a sequential approach and steer residential development away from those areas at risk of flooding from the River Thames during the design event (1% AEP including climate change).

Finished floor levels for residential accommodation must be above the design flood event (1% AEP including climate change).

Safe access/egress (i.e. that is dry or Low hazard during the 1% AEP event including 35% climate change allowance) is likely to be achievable north west along Kingston Road and then east along London Road.

A Flood Warning and Evacuation Plan should be prepared for the site and places of safe refuge should also be designed into the development, above the design event (1% AEP including climate change).

The site is located in a priority area identified by the Lead Local Flood Authority SCC due to the number of internal and external flooding records in the area. Runoff from the site will need to be reduced to greenfield or less where possible.

Development proposals for the site should demonstrate sustainable approaches to the management of surface water making use of SuDS including green roofs, rainwater harvesting and other innovative technologies; and incorporate soft landscaping, planting and permeable surfacing.”

b) Confirm the approach taken by the main Viability Assessment in relation to flood risk generally and to site-specific contingencies. At a minimum, rerun Stage 4 of the site allocation assessment for ST3/004 incorporating Level 2 SFRA findings (and updating any other factors affecting the deliverability and viability of the site).

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618772/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: I do not consider that the voice of residents has been heard.

<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1116691</b>	
<b>Policy / Evidence Base / Part of Plan: ST4/002 (Bridge Street Car Park, Hanover House &amp; Sea Cadet Building, Bridge Street, Staines)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: I don't consider residential allocation ST4/002 to be legally compliant as some of the related evidence has been collected retrospectively. Same argument as ST3/004
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: I don't consider site allocation ST4/002 to be sound as it is not justified or effective*. * I could only tick one box in Q2a. ST4/002 is not part of an appropriate strategy based on the evidence and is not deliverable in its current form when properly
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: Have replied "Yes" as no option to say "don't know" although not really sure on a site-specific basis. See main submission.
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
I don't consider residential allocation ST4/002 to be legally compliant as some of the related evidence has been collected retrospectively. Same argument as ST3/004 I don't consider site allocation ST4/002 to be sound as it is not justified or effective. (continued from Q2)	

One of the main areas which hasn't been properly considered is flood risk.

a) Neither the Local Plan site allocation summary on p.164/165 nor the detailed site allocation assessment (Stage 1 on p.313 and Stage 2b on p.316) are consistent with the findings of the Level 2 SFRA for ST4/002.

As noted for ST3/004, the Level 2 SFRA was completed in July 2022 AFTER publication of the Pre-Submission version of the Local Plan and the site allocation assessments. The Level 2 SFRA (Appendix B) flags a number of site-specific issues and constraints for ST4/002.

Stage 1 of the site allocation assessment states that approx. 10% of the site is located within flood zone 3b. The Level 2 SFRA (Appendix B) estimates this to be 31%. It is unclear if the 'exception' allowed by Policy E3 accounts for the difference.

In any event, it does not appear that Stage 2b of the site allocation assessment for ST4/002 has reflected ALL the site-specific issues and constraints identified by the Level 2 SFRA. Nor are they reflected in the Local Plan site allocation summary for ST4/002 which does make a reference to Policy E3\* and incorporating flood risk mitigation measures but doesn't mention the absolute constraint of 31% Flood Zone 3b (or even the lower figure of 10% mentioned in the Stage 1 assessment).

\*erroneously referenced as E2 but they mean E3

b) It does not appear that the Viability Assessment completed in July 2022 builds in any allowance for flood risk mitigation and adaption in its broad assumptions generally, especially important in relation to sites in Staines, nor does it claim to. As such, it is even more important that this is done at the detailed site allocation assessment (Stage 2b).

Same argument as ST3/004.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

To go some way towards making ST4/002 legally compliant, the stages of assessment need to be redone in the right order with the latest available evidence.

To go some way towards making ST4/002 sound with regard to flood risk:

a) Review the Local Plan allocation and Stages 1 & 2b of the site allocation assessment for ST4/002 in light of ALL Site-Specific Issues and Constraints identified in the Level 2 Strategic Risk Assessment (Appendix B) as follows:

"Development is not permitted in areas of Flood Zone 3b Functional Floodplain. This part of the site should be retained as floodplain and steps taken to restore the land to provide a more natural edge of the River Thames.

More Vulnerable development is only permitted in the areas of Flood Zone 3 on this site where it can be demonstrated that the Exception Test is satisfied i.e. (1) that the proposed development will provide wider sustainability benefits to the community that outweigh flood risk, and (2) that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall. The following recommendations are made for this site:

- Development of the northern part of the site may be possible. Development must not decrease the available floodplain storage and therefore the design should enable the free flow of floodwater at ground floor level.
  - Hotel accommodation or residential accommodation can be located at first floor level. Finished floor levels should be set above the design flood level (1% AEP including climate change).
  - Safe access/egress (i.e. that is dry or Low hazard during the 1% AEP event including 35% climate change allowance) may be achievable along Clarence Road. A place of safe refuge should also be provided within the development, above the design event (1% AEP including climate change).
  - The site is located within the Flood Warning Area for the Thames and Colne and a Flood Warning and Evacuation Plan would need to be developed for occupants of the site to set out the response in the event of flooding.
  - Development proposals for the site should seek to restrict surface water runoff rates to greenfield rates; demonstrate sustainable approaches to the management of surface water making use of SuDS including green roofs, rainwater harvesting and other innovative technologies; and incorporate soft landscaping, planting and permeable surfacing.
  - The risk of groundwater flooding and groundwater levels should be further assessed as part of a Site Investigation.”
- b) Confirm the approach taken by the main Viability Assessment in relation to flood risk generally and to site-specific contingencies. At a minimum, rerun Stage 4 of the site allocation assessment for ST4/002 incorporating Level 2 SFRA findings (and updating any other factors affecting the deliverability and viability of the site).

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618740/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: I do not consider that the voice of residents has been heard.

<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1116695</b>	
<b>Policy / Evidence Base / Part of Plan: ST4/019 (Former Debenhams Site, High Street)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: I don't consider residential allocation ST4/019 to be legally compliant as some of the related evidence has been collected retrospectively. Same argument as ST3/004
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: I don't consider site allocation ST4/019 to be sound as it is not justified or effective*. * I could only tick one box in Q2a. ST4/019 is not part of an appropriate strategy based on the evidence and is not deliverable in its current form when properly
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: I have replied "Yes" as no option to say "don't know" although not really sure on a site-specific basis. See main submission
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
I don't consider residential allocation ST4/019 to be legally compliant as some of the related evidence has been collected retrospectively. Same argument as ST3/004 I don't consider site allocation ST4/019 to be sound as it is not justified or effective. (continued from Q2)	



The Viability Assessment found the site likely to be “non-viable”. Also flood risk hasn’t been properly considered.

a) Neither the Local Plan site allocation summary on p.166/167 nor the detailed site allocation assessment (Stage 2b on p.349) are consistent with the findings of the Level 2 SFRA (Appendix B) for ST4/019.

As noted for ST3/004, the Level 2 SFRA was completed in July 2022 AFTER publication of the Pre-Submission version of the Local Plan and the site allocation assessments. The Level 2 SFRA (Appendix B) flags a number of site-specific issues and constraints for ST4/019.

Furthermore, it does not appear that Stage 2b of the site allocation assessment for ST4/019 has reflected ALL the site-specific issues and constraints identified by the Level 2 SFRA. Nor are they reflected in the Local Plan site allocation summary for ST4/019 which makes no reference to Policy E3\* (although 4 other sites in Staines town centre do).

\*erroneously referenced as E2 in the original but they mean E3

b) It does not appear that the Viability Assessment completed in July 2022 builds in any allowance for flood risk mitigation and adaption in its broad assumptions generally, especially important in relation to sites in Staines, nor does it claim to. As such, it is even more important that this is done at the detailed site allocation assessment (Stage 2b).

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

To go some way towards making ST4/019 legally compliant, the stages of assessment need to be redone in the right order with the latest available evidence.

To go some way towards making ST4/019 sound with regard to flood risk:

a) Review the Local Plan allocation and Stage 2b of the site allocation assessment for ST4/019 in light of ALL Site-Specific Issues and Constraints identified in the Level 2 Strategic Risk Assessment (Appendix B) as follows:

“More Vulnerable development is permitted in Flood Zones 1 and 2, and the Exception Test is not required. A site specific FRA will be required to demonstrate that the proposed development will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall. Given the risk of flooding to the surrounding area the following recommendations are made:

☑ Apply a sequential approach and steer residential development away from those areas at risk of flooding from the River Thames during the design event (1% AEP including climate change).

☑ Safe access/egress (i.e. that is dry or Low hazard during the 1% AEP event including 35% climate change allowance) may not be achievable from the site, given the risks of flooding to the surrounding area. The route along High Street goes underneath the railway line and is at risk of flooding. Provision of an improved route out of this area could improve the safety of future development in this area.

☑ A Flood Warning and Evacuation Plan should be prepared for the site and places of safe refuge should also be designed into the development, above the design event (1% AEP including climate change).

- ☑ The site is located in a priority area identified by the Lead Local Flood Authority SCC due to the number of internal and external flooding records in the area. Runoff from the site will need to be reduced to greenfield or less where possible.
  - ☑ Development proposals for the site should demonstrate sustainable approaches to the management of surface water making use of SuDS including green roofs, rainwater harvesting and other innovative technologies; and incorporate soft landscaping, planting and permeable surfacing.
  - ☑ The risk of groundwater flooding and groundwater levels should be further assessed as part of a Site Investigation”
- b) Confirm the approach taken by the main Viability Assessment in relation to flood risk generally and to site-specific contingencies. At a minimum, rerun Stage 4 of the site allocation assessment for ST4/019 incorporating Level 2 SFRA findings (and updating any other factors affecting the deliverability and viability of the site).

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618750/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: I do not consider that the voice of residents has been heard.

<b>Respondent: Mrs Kath Sanders (19813377)</b>	
<b>Organisation:</b>	
<b>Response ID: 1113702</b>	
<b>Policy / Evidence Base / Part of Plan: ST1/030 (Fairways Day Centre, Knowle Green, Staines)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: I don't believe ST1/030 is compliant because the SFRA Level 2 was only completed and published in July 2022. The Pre-submission Version of the Local Plan was finalised and issued by 15 <sup>th</sup> June 2022. According to the government's Procedure Guide for Local
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: I don't consider ST1/030 to be sound as it is not justified, effective OR consistent with national policy (as it goes against the recommendations of the sequential test). However, if I have to choose one, I would say this allocation is not justified as it
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: I have replied "Yes" as no option to say "don't know" although not really sure on a site-specific basis. See main submission.
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
As mentioned in Question 1, I don't consider ST1/030 to be legally compliant as the related evidence has been collected retrospectively. I don't consider site allocation ST1/030 to be sound as it is not justified, effective OR consistent with national policy. One of the main areas which hasn't been properly considered is flood risk. Neither the Local Plan site allocation summary on p.196/197 nor the detailed site allocation assessment (Stages 1 and 2b, starting on p.254) are consistent with the findings of the Level 2 SFRA for ST1/030.	

It's not sound as the summary site allocations says residential allocation is proposed for approx. 30 units where SFRA Level 2 says that residential development is unlikely to be suitable. The latter states: "The majority of this site is located in the flood extent for the 5% AEP (1 in 20 year) event. Policy E2 [sic] states that within the 1 in 20 year (5% AEP) extent, existing infrastructure or solid buildings that resist water ingress are not included within the definition of Flood Zone 3b Functional Floodplain and the associated planning requirements do not apply. However, Policy E2 [sic] does not permit redevelopment that will increase the vulnerability classification of the development and the number of occupants on the site. It is therefore considered that redevelopment of this site to include residential uses is unlikely to be appropriate."

Furthermore, Stage 1 of the site allocation assessment states that there are no absolute constraints and argues in the SA that "the site is already developed with impermeable hardstanding". Stage 2b says that "part of the site (less than half) is within Flood Zone 3b and the remainder of the site is within FZ3a" – it is unclear what percentage of the FZ3b element the assessment believes to be exempt. NB The Level 2 SFRA (Appendix B) estimates that 25% is in FZ3a and 73% is in FZ3b (presumably before any exemption). Greater clarity is required.

It does not appear that Stage 2b of the site allocation assessment for ST1/030 has reflected ALL the site-specific issues and constraints identified by the Level 2 SFRA.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

This allocation should not be included in the Local Plan for residential use.

It should be considered for an alternative community use which is suited to location.

**Question 6:** You can upload any modifications below.

Sanders, Kath.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618742/PDF/-/Sanders%5F%20Kath%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: I do not consider that the voice of residents has been heard.

<b>Respondent: Mr Ken Saunders (19539521)</b>
<b>Organisation: Spelthorne Committee for Access Now (SCAN)</b>

<b>Response ID: 1111820</b>
<b>Policy / Evidence Base / Part of Plan: Policy H1: Homes for All</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
On behalf of Spelthorne Committee for Access Now (SCAN) and the thousands of disabled residents throughout the borough of Spelthorne I attach comments on Policy H1 of the emerging Local Plan I am not satisfied that as drafted the policy will ensure the much needed provision of homes for disabled people and I am not convinced that the Council has recently been exercising its' 'Public sector equality duty ' under the current local plan. There is catching-up to do. Proposed Policy - Homes for all As drafted the policy has far too many exclusions to ensure that the requirement for accessible and adaptable dwellings and wheelchair dwellings can be achieved to ensure the Council can make steps towards redressing the poor record of the provision of housing for disabled people in the Borough of Spelthorne over the past few years. .

The necessary link with Part M of the Building Regulations 2010 means that the detailed technical requirements of those regulation must be integrated into planning decisions by way of conditions on any approval. I believe that a Part M Consultant should be part of any planning team dealing with planning applications.

In order that a Building Control Body can enforce the relevant standard of PartM(4) for individual dwellings they will need to be identified. How detailed the wording of the local plan needs to ensure this can be achieved is a matter for planning lawyers. However the situation found in the current local plan, which appears to prevent planning officers from requesting the provision of access and facilities for disabled people, must not be repeated. At a time when there is a significant shortfall of accessible dwellings for disabled people it should be made very difficult for developers/builders to avoid complying with the more stringent optional requirements of Part M of the Building Regulations.

Below is the wording of Policy H1 within which I have marked some of the proposed text.

Highlighted yellow is text I do not consider necessary and which significantly weakens the objective of creating dwellings which 'meet the changing needs of their occupants over their lifetime'. Given the advances in technology, materials and building techniques over recent years there are very few reasons why a 'feasible, practicable or viable' solution should not be available. Any reasons provided by developers need to be vigorously contested. Dealing with the flood risk may require some ingenuity but must not be allowed to disregard or disadvantage disabled people. As written the policy merely provides applicants an opening to avoid making provision for disabled people.

Text highlighted in green below is incorrect. It is recognised that the wording of Part M(4)(3) of the Building Regulations 2010 – see appendix A, below – is not simple. The various requirements of Part M(4) are 'optional' and the default position to achieve improved facilities for disabled people must be for the provision of wheelchair user dwellings (PartM4(3)(2)(b)). The emphasis must be on wheelchair user dwellings. As worded the emphasis is on the lower optional standard Part M(4)(3)(a), unnecessarily allowing for adaptable dwellings, and potentially precluding the requirement of wheelchair user dwellings.

Assuming the NPPF definition is used, in paragraph 8© the meaning of 'Major (Housing) Development' in this context is expected to mean 10 dwellings. For such a development that would result in at least one dwelling to PartM(4)(3)(2)(a) and one to PartM(4)(3)(2)(b) based upon the wording I propose, below. The original wording is too vague although I would support a proposal for 10% of dwellings to be constructed to PartM(4)(3)(2)(b)..

**Question 6:** You can upload any modifications below.

Local Plan Comments - Policy H1.odt

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/563015/ODT/-/Local%20Plan%20Comments%20%2D%20Policy%20H1%2Eodt>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ken Saunders (40985057)</b>
<b>Organisation:</b>

<b>Response ID: 1114546</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy H1: Homes for All
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
On behalf of Spelthorne Committee for Access Now (SCAN) and the thousands of disabled residents throughout the borough of Spelthorne I attach comments on Policy H1 of the emerging Local Plan I am not satisfied that as drafted the policy will ensure the much needed provision of homes for disabled people and I am not convinced that the Council has recently been exercising its' 'Public sector equality duty ' under the current local plan. There is catching-up to do. Proposed Policy - Homes for all As drafted the policy has far too many exclusions to ensure that the requirement for accessible and adaptable dwellings and wheelchair dwellings can be achieved to ensure the Council can make steps towards redressing the poor record of the provision of housing for disabled people in the Borough of Spelthorne over the past few years. .



The necessary link with Part M of the Building Regulations 2010 means that the detailed technical requirements of those regulation must be integrated into planning decisions by way of conditions on any approval. I believe that a Part M Consultant should be part of any planning team dealing with planning applications.

In order that a Building Control Body can enforce the relevant standard of PartM(4) for individual dwellings they will need to be identified. How detailed the wording of the local plan needs to ensure this can be achieved is a matter for planning lawyers. However the situation found in the current local plan, which appears to prevent planning officers from requesting the provision of access and facilities for disabled people, must not be repeated. At a time when there is a significant shortfall of accessible dwellings for disabled people it should be made very difficult for developers/builders to avoid complying with the more stringent optional requirements of Part M of the Building Regulations.

Below is the wording of Policy H1 within which I have marked some of the proposed text.

Highlighted yellow is text I do not consider necessary and which significantly weakens the objective of creating dwellings which 'meet the changing needs of their occupants over their lifetime'. Given the advances in technology, materials and building techniques over recent years there are very few reasons why a 'feasible, practicable or viable' solution should not be available. Any reasons provided by developers need to be vigorously contested. Dealing with the flood risk may require some ingenuity but must not be allowed to disregard or disadvantage disabled people. As written the policy merely provides applicants an opening to avoid making provision for disabled people.

Text highlighted in green below is incorrect. It is recognised that the wording of Part M(4)(3) of the Building Regulations 2010 – see appendix A, below – is not simple. The various requirements of Part M(4) are 'optional' and the default position to achieve improved facilities for disabled people must be for the provision of wheelchair user dwellings (PartM4(3)(2)(b)). The emphasis must be on wheelchair user dwellings. As worded the emphasis is on the lower optional standard Part M(4)(3)(a), unnecessarily allowing for adaptable dwellings, and potentially precluding the requirement of wheelchair user dwellings.

Assuming the NPPF definition is used, in paragraph 8© the meaning of 'Major (Housing) Development' in this context is expected to mean 10 dwellings. For such a development that would result in at least one dwelling to PartM(4)(3)(2)(a) and one to PartM(4)(3)(2)(b) based upon the wording I propose, below. The original wording is too vague although I would support a proposal for 10% of dwellings to be constructed to PartM(4)(3)(2)(b)..

IPolicy H1 – Homes for all

Accessible Homes (as drafted)

8) All new homes must be designed and constructed in a way that enables them to be adaptable, so they can meet the changing needs of their occupants over their lifetime. Planning permission will be granted for new dwellings subject to the following:

(a) All new build dwellings will, as a minimum, be constructed in accordance with the requirements of Building Regulations Part M4 (2) and any subsequent updates, unless it can be demonstrated that it is unfeasible to do so.

(b) The encouragement, where practicable and viable, of dwellings on schemes involving major development being provided as wheelchair adaptable dwellings in accordance with the Building Regulations M4(3) standard: Category 3.

© Unless it can be demonstrated that it is unfeasible to do so, the Borough Council will require a minimum of 10% of new dwellings on major housing developments to accord with Category M4(3) (wheelchair adaptability).

9) Exemptions will only be considered where the applicant can robustly demonstrate that compliance would significantly harm the financial viability of the scheme, or where it is not practical to do so given the flood risk. All residential proposals should be accompanied by a separate document setting out how proposals (including each dwelling type) accord with each of the standards as detailed in Building Regulations. Where exemptions are sought on practicality or viability grounds, the minimum number of units necessary will be exempted from the requirements i.e. If only 1 out of 3 wheelchair accessible dwellings can be provided, then the 1 still applies.

Policy H1 – Homes for all

Accessible Homes (as suggested)

8. All new homes must be designed and constructed in a way that enables them to be adaptable, so they can meet the changing needs of their occupants over their lifetime, including as a result of any disability. Planning permission will be granted for new dwellings subject to the following:

1. All new build dwellings will, as a minimum, be constructed in accordance with the optional requirement M4(2): Category 2 – Accessible and adaptable dwellings of the Building Regulations 2010 and any subsequent updates,

2. On schemes involving major housing development a proportion of new dwellings in excess of 10% being provided in accordance with optional requirement M4(3): Category 3 – Wheelchair user dwellings, with 5% of the total of dwellings in the development complying with Part M4(3)(2)(b).

9. Exemptions will only be considered where the applicant can robustly demonstrate that compliance would significantly harm the financial viability of the scheme. All residential proposals should be accompanied by a separate document setting out how proposals (including each dwelling type) accord with each of the standards as detailed in Building Regulations.

Appendix A

Extract from the Approved Document M Volume 1 of the Building Regulations 2010

0.3 Requirements M4(2) and M4(3) are 'optional requirements' as defined in the Building Regulations. An optional requirement only applies where a condition that one or more dwellings should meet the relevant optional requirement is imposed on new development as part of the process of granting planning permission. Where no condition is imposed, dwellings only need to meet requirements M4(1). Compliance should be assessed against only one of requirements M4(1), M4(2) or M4(3) for any given dwelling.

0.4 Where any part of an approach route, including vertical circulation in the common parts of a block of flats, is shared between dwellings of different categories, Section A of the optional requirement for the highest numbered category of dwelling served will apply to that part of the approach route.

0.5 Where a local planning authority sets a planning condition for Category 3 (wheelchair user) housing it can specify which dwellings should be wheelchair accessible by including in the planning permission a condition stating that optional requirement M4(3)(2)(b) applies. Where no such condition is applied, optional requirement M4(3)(2)(a) will apply by default requiring that dwellings should be wheelchair adaptable.

0.6 The person carrying out building work must inform the building control body where any optional requirements apply.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Susan and Keith Sawyer (42100801)</b>
<b>Organisation:</b>

<b>Response ID: 1119440</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
LGS : Ashford Town The Wickets As a resident of The Wickets, I am writing to support our park in the corner of The Wickets being designated as a 'Local Green Space' . Having lived in our house since the development was built 27 years ago, I can tell you our park is a treasured part of our community. We, along with other long-term residents, used it as a safe play area for our own children to play with other neighbours children and we now use it for our grandchildren; we use it with our wider family and our other visitors. We have a disabled child as part of our community, this is also a wonderful safe place for him to play with other neighbours' children and grandchildren.

From the beginning, it has also been our area for shared community events; celebrating events such as the Queen's Jubilee's, including the recent celebrations for our dear Queen's 70 years on the throne, all the residents, their families and friends sharing food, games, and raising funds (for Ukraine on this occasion). We are already discussing plans to celebrate King Charles' coronation!  
Having already written to your Spelthorne Leaders (copied to Liz Truss PM and Kwasi Kwarteng MP) concerning the decline and Levelling down (not up!) of Ashford by Spelthorne over recent years, particularly over the last 18 months, the selling off of our park to property developers would put the final nail in the coffin of us, and my neighbours, as a Conservative voters supporting Spelthorne.  
Looking forward to seeing our park re-designated.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: USS (Universities Superannuation Scheme) (26325825)</b>	
Organisation:	
<b>Response ID: 1128580</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS2: Designing places and spaces	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: subject to representation comments
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: Yes	Additional Comments: subject to representation comments
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: subject to representation comments
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Draft Policy SP2 'Designing places and spaces' sets out that for major developments, particularly those exceeding 50 dwellings, it may not always be desirable to reflect locally distinct patterns of development. It states "these sites should create their own identity" which USS considers a sound objective for relevant developments and achievable within the context of site allocation ST4/004. Full rep attached.	
<b>Question 6:</b> You can upload any modifications below.	
USS Reps to Pre-submission Spelthorne Local Plan _Reg 19__ Redacted.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618982/PDF/-/USS%20Reps%20to%20Pre%2Dsubmission%20Spelthorne%20Local%20Plan%20%5FReg%2019%5F%5FRedacted%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618982/PDF/-/USS%20Reps%20to%20Pre%2Dsubmission%20Spelthorne%20Local%20Plan%20%5FReg%2019%5F%5FRedacted%2Epdf</a>	



**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: USS (Universities Superannuation Scheme) (26325825)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128581</b>	
<b>Policy / Evidence Base / Part of Plan: Policy E2: Biodiversity</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: subject to representation comments
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: subject to representation comments
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: subject to representation comments
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>Policy E2 Biodiversity</p> <p>Draft Policy E2 'Biodiversity' sets out the Council's support for proposals which contribute to biodiversity through clearly demonstrable improvements as part of securing biodiversity net-gain. The draft Policy states that all development will be expected to achieve a 10% net-gain in biodiversity and a demonstrated consideration for a variety of means to deliver this.</p> <p>USS acknowledges the importance of increasing biodiversity in new developments and is generally supportive of the ambitions of draft Policy E2. USS notes that the Council is keen to use the Biodiversity Net Gain Metric. USS supports the ambition to monitor and improve biodiversity in Spelthorne but notes that the Biodiversity Metric calculation spreadsheet is not always the most appropriate method depending on the proposed development and site-specific circumstances. It is not required by the National Planning Policy Framework (2021) and there should be flexibility within Policy E2 to use alternative methods of biodiversity assessment where appropriate; for example the Chartered Institute of Ecology and Environmental Management guidelines. USS recommends that the Policy wording be updated to ensure the abovementioned flexibility in regard to biodiversity and to ensure the plan is considered sound.</p>	



USS agrees with the Council that urban environments can accommodate and improve biodiversity. In particular, the redevelopment of brownfield sites offers opportunities to improve biodiversity. It is important for the Council, however, to recognise that integrating bird nest boxes, bee bricks or green roofs in urban environments is not always the most effective way to increase biodiversity and this should be taken into account in the formulation of planning policy and the determination of planning applications. It is not always suitable to provide these biodiversity related installations in a large proportion of units especially if these are apartments. USS advises that this consideration should be reflected within Policy E2 to ensure its soundness. See attached for full rep.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

USS Reps to Pre-submission Spelthorne Local Plan \_Reg 19\_\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618983/PDF/->

[/USS%20Reps%20to%20Pre%20Submission%20Spelthorne%20Local%20Plan%20%5FReg%2019%5F%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618983/PDF/-/USS%20Reps%20to%20Pre%20Submission%20Spelthorne%20Local%20Plan%20%5FReg%2019%5F%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Nikki Scholes (42037633)</b>
<b>Organisation:</b>

<b>Response ID: 1122611</b>
<b>Policy / Evidence Base / Part of Plan:</b> Evidence base - IDP
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Much more needs to be done to ensure policies ID1 / ID2 are sound and legally compliant. As it stands this part of the plan is not justified by the Evidence Base and is not effective. 8). I have regularly travelled by train from Staines station into London with a wheelchair. It is a nightmare! Living in sunbury I have to drive to staines as none of the local stations are accessible. There I have to pay extortionate parking rates. Then I have to pray the lifts are working the other side of the station for when I get home again, because if they are not I then have to walk with a wheelchair up hill and down dale. Not to mention the amount of people on the trains. I have to ask the guard to push through people that are standing in order to get through people. So to say the infrastructure of the trains and busses is suitable is not forethought at all.

The infrastructure will not take them to work...or get them GP appointments.. the effort of this will be huge on the mental health of new residents doing train journeys where trains are packed day in and day out. The same applies to the busses.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Nikki Scholes (42037633)</b>
<b>Organisation:</b>

<b>Response ID: 1122593</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
When we saw the amount of building in the area we hoped you may have taken things into account. However, I see nothing legitimate or sustainable in the plans. It is NOT accessible to all as you say throughout. 2). Families: I was homeless with a young daughter many years ago, following leaving a domestic abuse situation. I know what it is like to need housing and for it not to be there. I also know, that when houses came up they were gold dust and those on the list did not stand a chance of getting one because everyone wanted a house. No one wanted to be cramped up in a flat. Yet you are building flats and aim to put children in those flats. These are no good to children. People with children want outdoor space for the children to play in. They want their own gardens. You are not catering for these. With the pandemic showing how easy it is to force children into lockdown, those in flats would have been far more affected than those with outdoor space to call their own. Parents do not want to be struggling up the stairs with buggies or prams. Hence why they do not want flats.

Further, in my area, the two bed houses are overcrowded with families who need larger accommodation. There is nowhere for them to go and you are not building housing for them. You are building more of what you have already got. One and Two beds! This is not addressing the housing situation for families.

4). You are building the wrong kind of houses for this population. You need to build three, four and five bed houses, so that those overcrowded in the two bedrooms have somewhere to go to and thus relieving all the two bed properties already in the councils or housing associations portfolio. If you have nowhere to build start buying the private ones up because you will get two families housed then moving up in the council list and the ones at the top of the list who need a two bed.

5). The council refuse to even talk to me about putting a dip into a kerb to allow access to my daughter and her wheelchair. I have sent in two requests and neither have been replied to. They refuse pointblank to help those with disabilities and accessibility. Yet we are expected to believe they are looking after those on the housing list in most need? How can they be when they are not thinking of the impact. It is a nightmare to get around many parts of the borough in a wheelchair, yet no evidence of any plans to address this. This needs to change. Many people with disabilities find themselves in total dependency on the system. Yet the planners do not think or are prepared for how to look after people when these things happen.

The lists at the council will never lessen until you start providing houses for growing families and houses and bungalows for the disabled I am not talking Flats flats bring all kinds of issues to those with mobility issues and all kinds of issues for children. Yet you continue to build flats! Why?

A lesson: Many years ago, whilst studying at university as a drama student, our tutor ran an experiment with us. I think your planners should try it. They split our group of thirty into five groups of six people each. Then they took us over the university and placed us in different sized spaces. We were told to figure something out to show everyone. We had an hour to do it. I was in a hallway with five other people. It was a small hallway like what you would get in a typical three bed semi. At the other end of the scale was a group in a warehouse huge and the rest were dotted in rooms of different sizes in between. At the end of the hour, we were asked to show each other in the same spaces what we had done. Our group had attained very little in fact nothing as the room was far too small for us. Those in the larger spaces had room to work and to breath. They produces really good work and were laughing and joking. Our group was the opposite. The lesson was if you have no room to breath you will not be productive and you will be argumentative. So when you over crowd homes, and give people the wrong spaces to live in, you are not getting people concentrating on bettering themselves and you are breeding depression and arguments and mental health issues. Give them the right kind of accommodation and where they can work from home and they will breathe and they will fly and they will come off of benefits and in the long term,

you will be breeding hope. You will not be affecting your infrastructure as people are working from home! Yet you keep building the small flats for families of four, who can soon become five or six and who will then be back on your waiting list ....its a never ending cycle that this plan does not address.

9). A solution for said housing problems other than building flats that residents cannot afford... The council should purchase three, four and five beds in this area and put the growing families into them thus freeing up many two beds already in the area. The council are buying enough property from outside the area, I refuse to accept it cannot be done in this area.

10). Wheelchair accessibility: This is a joke in the borough. This does not exist. We have asked for it where we live and are ignored. We have been asking for years now. Nothing despite OT reports. No houses to move us too although being assessed and no funds to help us move. We are not alone here there are people all over the borough stuck in inaccessible roads and housing. Phillip Road in Staines full of flats and maisonettes and the only parking there is on the pavement.

The flats are only good for those working outside the area.. not those in the borough of Staines.

14). Stratton Road fields. Horses are on this field regularly and houses over look this area. I should imagine there will be a fight over this area a. However, I think your points are good and I think it is out of a flooding area. Having said this can the infrastructure take a whole housing estate there? I do not think so.

I have today visited Sunbury Station, Kempton Park Station and Upper halliard station. They are no good for wheelchair accessibility none of the train stations have lifts so you may be able to get out but not back again if you are in a wheelchair. Also, have you been down to Upper Halliford? It is eerily quiet and in my opinion, having worked in a prison, unsafe for youngsters to walk down there alone at any time. So to propose that youngsters can use this station to access a new sixth form college is not safe. It is very lonely and I would think a high risk category for criminal activity down there. I would not let my sixteen year old daughter walk alone down there, that is for sure.

It is also not accessible. So if you want to provide communities joining together you are not doing very well. There is no way anyone with a disability can get around on the trains from any of those stations. No thing in the plan to make it so either. So no housing there for the most vulnerable on your housing lists unless they have a car. Houses with drives? Yes but not flats!

15). The leisure centre. Whose idea was it to put four football pitches on the top of a building? Health and safety will be all over this. Have you seen some of the unruly children in this area? That will become sling shot city up there... I have seen the local kids play football. It hits cars and windows constantly and you want them to have a ball on the top of a roof? I would not want to be walking below it. It is a danger to the public and property.

\*\*Until I start seeing that this council takes the needs of the most vulnerable on their housing lists into consideration, along with safety of children and the disabled, I will not be backing plans that I have seen before me and strongly object to it all.

\*\*These plans are not indicative of the needs of the area, as it leaves out safety for children and residents constantly. No evacuation plans. Opposition from Fire and Safety. Opposition from several entities including Legally Powered.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Nikki Scholes (42037633)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122587</b>	
<b>Policy / Evidence Base / Part of Plan: Policy H1: Homes for All</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>Re: 15 year Planning Strategy for the Spelthorne Area.</p> <p>I write to you as a resident of the borough who lives in a housing association property. I have been homeless and been in bed and breakfasts out of the area. I have been a home owner. I have been through the system. I therefore commend you on trying to solve the problems of housing in our area. However, upon seeing the plans, they are fraught with danger and do not address the needs of the community in any way shape or form. They do not address the needs of families, the disabled or the vulnerable or a growing residential base or the infrastructure of the area in any way.</p> <p>These are my points:</p> <p>1) None of these properties are suitable for the disabled. The disabled or those with health conditions are given priority on the councils list. They are the ones most in need who cannot get out to work or if they are in work would need help in getting there and staying there.</p> <p>My mother waited for a year in Band A1, as the council had nowhere to put her. A whole year, living in one room, with carers round the clock. That is eating, bathing via strip wash and using a commode for the toilet in the living room daily with no dignity. She is not the only one either. There are several people living in these conditions. The council lists are full of people like my mother because it took a year for them to house her.</p>	



My daughter, is in a housing association property and none of the properties in your 15 year plan would be suitable for her, or others with her needs. She struggles to get around the area with her power chair but no assistance is forthcoming to help her. Many other disabled residents are in the same boat. The plan does not address this yet it says it will be accessible for all.

When we saw the amount of building in the area we hoped you may have taken things into account. However, I see nothing legitimate or sustainable in the plans. It is NOT accessible to all as you say throughout.

There are no properties suitable for the disabled as all the proposals are flats with no way of escape in fire or flood.

3). If you look at the housing allocations policy you will see that one bed flats go to people in band D! Band D that is the fourth one down because they are not suitable for those in medical categories and nobody wants to live in them. Therefore those with health conditions who are in exceptional needs are ignored and overlooked. Your plan does not take this into consideration.

11). Flats built with no thought for safety for children or the disabled.

You cannot even work from home as not space is allocated in the policy for extra rooms so people can do so, So no way out of the benefit system. No bigger houses to go to to allow for it because the wrong size houses are being built. Giving constantly overcrowded situations and constant housing lists!

\*\* I would suggest someone on the planning committee, gives themselves a challenge, take to a wheelchair for a week, move to Phillip road in Staines as an experiment to see what it is like to get around in staines from there. Or Kenyngton Drive in Sunbury and see how they would cope getting up and down kerbs, and in and out of houses and flats to see how it is then. Try getting on and off the busses and trains.. try it for a week and see how bad it is and ask yourselves, when you are elderly, would you be happy if you were permanently in that wheelchair if you don't sort it out now, when you get to the phase it will be too late. It is ironic that Surrey, it seems, has plenty of money to acquire property out of the area or for new builds of one and two beds but no money for anything else. They are even making people who have no money left at the end of the month pay over £20 per month for council tax. They have already identified that they have no money left to give towards the council tax but still charge them for it.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Nikki Scholes (42037633)</b>
<b>Organisation:</b>

<b>Response ID: 1122597</b>
<b>Policy / Evidence Base / Part of Plan: Policy H2: Affordable Housing</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
6). These flats say affordable. How can they be affordable? To Whom? To people who work in the care system around here on £9 per hour? To people who work in Tescos on the same rate? To council workers, to your own housing staff? To your cleaners? All important people and important jobs on low incomes? Who are they affordable to? I cannot see them being affordable to anyone in these positions. They are not affordable to me and would not have been even when I was employed as a qualified teacher in this area and not an unpaid carer. They are not affordable to the residents of Spelthorne. Many on the housing list cannot afford to get a mortgage and hence why they apply for housing in the first place. The rents in the area are astronomically high and so working employed people in the area become dependant on housing benefits. Something can only be affordable if you don't have to claim benefits to live there. Already there are one and two bed flats in Staines that are being advertised over and over again. Your residents do not want flats. They want gardens They want their own driveways ready for the electric cars that are coming in. They do not want to have to claim housing benefit to live yet the high rents push them into having no choice. Affordable housing is NOT the same as the council house rents. It is taking working peoples every penny and then some. Stop building property that only outsiders can afford.

\*\* Asking someone with disabilities who lives in a million pound house will not give you any ideas either as they are lucky enough to have their own drives and gardens but those who do not and depend on council homes, have to fight to know what it is like in the housing system and for those with disabilities their needs are constantly ignored. You cannot even work from home as not space is allocated in the policy for extra rooms so people can do so, So no way out of the benefit system.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Nikki Scholes (42037633)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122594</b>	
<b>Policy / Evidence Base / Part of Plan: Policy E3: Managing Flood Risk</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>There are no properties suitable for the disabled as all the proposals are flats with no way of escape in fire or flood. These properties are also to be built on flood plains. Therefore risking the lives of the people in them, both physically and financially. I, myself was a victim of flooding at Riverbank flats in Staines. I lost everything. The cellars were flooded so regularly we were told we could no longer use them for any kind of storage as the electrics were in danger of being flooded and causing electric shocks. You plan to build around this area. You, by your own admissions are breaking your own policies. If your house is built on a flood plain you cannot get insurance so all these flats are going to have tenants who cannot insure their belongings. That is NOT a responsible attitude to your tenants, their possessions, their life or any business which may be set up on these flood plains.</p>	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No Response	
<b>Question 6: You can upload any modifications below.</b>	

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Nikki Scholes (42037633)</b>
<b>Organisation:</b>

<b>Response ID: 1122622</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Phillip Road in Staines full of flats and maisonettes and the only parking there is on the pavement. That Green area that could be converted into drives for people same as kenyngton drive, but just ignored. However, there is clearly money available as the council can come up with these projects for flats, flats and more flats.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
No Response
<b>Question 6:</b> You can upload any modifications below.
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Nikki Scholes (42037633)</b>
<b>Organisation:</b>

<b>Response ID: 1122617</b>
<b>Policy / Evidence Base / Part of Plan: Policy ID1: Infrastructure and Delivery</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
7). 82 of resident own their own cars. Where are they going to park in these developments? Where are they going to charge their cars. Contrary to belief people in flats DO OWN their own cars. But no infrastructure in place to provide charging points. This is a major problem. No charging points no cars no movement no business no work benefits... deterioration in the area for households as the infrastructure in the area is appallingly poor. 8).I have regularly travelled by train from Staines station into London with a wheelchair. It is a nightmare! Living in sunbury I have to drive to staines as none of the local stations are accessible. There I have to pay extortionate parking rates. Then I have to pray the lifts are working the other side of t he station for when I get home again, because if they are not I then have to walk with a wheelchair up hill and down dale. Not to mention the amount of people on the trains. I have to ask the guard to push through people that are standing in order to get through people. So to say the infrastructure of the trains and busses is suitable is not forethought at all. The infrastructure will not take them to work...or get them GP appointments.. the effort of this will be huge on the mental health of new residents doing train journeys where trains are packed day in and day out. The same applies to the busses.

The parking is inadequate for what you propose. Those that need to see the doctor urgently will have to fight for parking. When a GP says come down now, they don't expect you to be on a bus or trains they expect you to be in walking distance or to drive. Those that need a GP will be feeling pretty rough to go in the first place.. so you should be thinking of them. You are not!

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Nikki Scholes (42037633)</b>	
<b>Organisation:</b>	
<b>Response ID: 1122619</b>	
<b>Policy / Evidence Base / Part of Plan: ST3/004 (Oast House, Kingston Road)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
12) The medical centre on the Oast House Car Park... A brilliant idea well done. And I mean that but once again no parking! So when someone has a cough cold or the flu, or sickness bugs or illnesses of any kind, you are inviting them to park in the town centre to spread their germs. The parking is inadequate for what you propose. Those that need to see the doctor urgently will have to fight for parking. I will agree with the medical centre as long as there is plenty of parking ON SITE.... Without this I disagree with it in its entirety.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
13). Suggestion: Get rid of the 180 flats proposal... and the restaurants all on the ground floor... let the whole area be for the medical centre and parking... it will be more cost effective.	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Miss Victoria-Jayne Scholes (41882049)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117273</b>	
<b>Policy / Evidence Base / Part of Plan: LCWIP; Retail Study; HRA</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: Documentations have not been published in accordance with the regulations. The consultation which was published on the 15 <sup>th</sup> June was done so with documentation not being present. Whilst regulation states that there is a statutory 6 weeks before consultati
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: I do not consider the Pre-Submission Spelthorne Plan as a whole to be sound. Section 20(2) of the PCPA specifically states that the LPA must not submit the plan unless they think it is ready for independent examination. The LPA should not submit if there	Additional Comments: I do not consider the Pre-Submission Spelthorne Plan as a whole to be sound. Section 20(2) of the PCPA specifically states that the LPA must not submit the plan unless they think it is ready for independent examination. The LPA should not submit if the
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	

The evidence given is not up-to-date. As the forward from Councillor Harvy and co has stated, they are being forced by the government to use documentation which is a decade out of date.

They have also missed vital evidence such as the Spelthorne Cycling and Walking Plan as this was released on the 6<sup>th</sup> of September which was after the original closing date of the plan but does not give enough time for anyone to read the plan to see how effective it is.

In total there are over 20 documents and Appendices that have been released, some of which have a published date of 2015. An example of this is the 'Spelthorne Retail and other Town Centre Uses study' which was published in 2015. Since then we have had a pandemic and cost of living crisis. The type of shops people use has changed. Using data which is just three years off being a decade old, could have a devastating effect on both residents who use the centre and the businesses who rely on the usage.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Miss Victoria-Jayne Scholes (41882049)</b>
<b>Organisation:</b>

<b>Response ID: 1117276</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not effective
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
The Local Plan is unsound on Effectiveness as it fails to take into account the needs of disabled individuals in the area. Local Transport is not effective, making walking routes for those less-abled will prove extremely difficult in which at the moment the use of a car is needed. It will push already needed business from main town centres to other areas due to the difficulties in gaining access to shops. Parents with small children, buggies and the elderly as well as those in wheelchairs and the disabled will not always be able to travel and walk, but by taking away much-needed parking and building up the area making more traffic on the road will overload the area with cars, which goes against the effectiveness of PS1 of responding to the climate emergency. Taking away does not mean people will stop using the car parks, it will force them to look elsewhere, therefore affecting the economic structure of Staines-upon-Thames.

3) of PS1 mentions incorporating active vehicle charging points, however, upon speaking to a number of people at the council it has been advised that people in flats do not drive and therefore does not need to have these charging points. It is in your own facts and figures that state that 85.2% of Spelthorne residents own a vehicle and therefore provisions need to be made for parking and charging for both disabled who may have Motability cars which come 2030 under current plans will be electric and for other car owners.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

Re-looking at the amount of parking that is being taken away. Re-analysing the number of people that own cars and looking at the infrastructure of the town centre. Whilst Climate Control needs to be addressed, it needs to be looked at in other areas to make sure that you are not trying to tackle the climate change issue by making people use public transport which in the long run will have a negative impact on the business in the town centre. Especially at Christmas the area will just become more backlogged and more emissions released whilst people wait for spaces. Less parking will not deter people from using cars only from using the town centre. You have no control over TFL or national rail, without a total overhaul of these systems the effectiveness of the plan to make it sound is weak and could make it non-compliant with other areas of the NPPF to make sure the infrastructure and welfare of residents is paramount.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: As someone in a wheelchair from an outside community with difficulties accessing local transport and relying on my car and wheelchair, I feel I can bring a sense of different perspective that others may not. I am from a low-income family who cannot afford to pay for travel as find this more money that using my car. If you put in the plans as they currently stand, I would seriously look at other town centres I can access with ease.



<b>Respondent: Miss Victoria-Jayne Scholes (41882049)</b>
<b>Organisation:</b>

<b>Response ID: 1117283</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy SP2: Ashford, Shepperton and Sunbury Cross
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not consistent with national policy
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
The Local Plan is not legally compliant, they have used documentation that is not appropriate to the policy, namely the open space assessment and playing pitch strategy and have missed vital evidence such as Spelthorne Cycling and Walking Plan which was too late to put into evidence for this consultation but which forms vital information. On section 2) on SP2 it stated that the council will seek to improve infrastructure, clarification is needed on this and there is nothing in the plan to state how this will be delivered. SP2 (5) if you are making updates to transport modes in Sunbury you have to make it accessible for disabled residents to get out of their property - safely. Dropping all kerbs so no need to use the roads, this is from their front door to all transport links. Please see my website for evidence of accessibility issues at Train stations in Sunbury, Upper Halifford and Kempton Park as well as accessibility issues just getting to my local park 2 minutes away. Without links from all roads being put in the plan is not deliverable. On Reasoned Justifications 5.13. states that infrastructure improvements will need to be in an accessible location to cater for all. The plan is not sound due to the effectiveness and being able to deliver.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

The Plan needs to set out how the council are going to make sure that the opportunities and infrastructure are in place to make sure it is accessible and it is utilised.

Where parts of the plan and the policy can be misinterpreted there needs to be clarification so that the policy is made transparent.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Miss Victoria-Jayne Scholes (41882049)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117301</b>	
<b>Policy / Evidence Base / Part of Plan: Policy H1: Homes for All</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not consistent with national policy	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
I am objecting to this consultation under section H1 8) Accessible Homes. Section 9 which gives exemptions, it details that flood risk would be one of those exemptions. Given the high amount of flood risk properties proposed under the local plan in the area, this would seem to diminish the need for any M4 properties and against the NPPF.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
The Local plan must not be seen to exempt M4 properties in particular that of M4(3) properties. We request that this exemption is taken out and other options are looked into for evacuations, such as having M4 properties on ground floors where appropriate. Where this can not happen, having ramped access to the floor will allow not only for people to safely access their property without fear of lifts breaking down but they then do not have to wait in their properties, scared when there is a fire as they could safely get out using ramped access. Failing that it is proposed that for every property that is turned down on an exemption an additional property is put in a local that is acceptable.	
<b>Question 6: You can upload any modifications below.</b>	

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Miss Victoria-Jayne Scholes (41882049)</b>
<b>Organisation:</b>

<b>Response ID: 1117326</b>
<b>Policy / Evidence Base / Part of Plan: Policy E3: Managing Flood Risk</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not effective
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
<p>Managing flood risk is not effective and is not consistent with the NPPF.</p> <p>Services in the area are stretched already, having more houses especially high-raised properties will see these at breaking points in the area. Most of the properties proposed are in a flood-risk area due to the rivers and reservoirs that surround Staines. It is putting everyone at risk and a Flood report for the area in 2009 stated that further development could affect surrounding areas. You have buildings such as the CC building in burges way which have no flood defences and flood all the time. The pictures attached show the floods in Leacroft in 2014. In the same area, you want to build more properties.</p> <p>Properties need both building and content insurance. You want to make these properties affordable and this is in line with the NPPF. However, the premium for a property that is at risk of flood is extremely high if they can get content insurance at all. The cost of the insurance will then put the cost of the property from an affordable one to a non-affordable property. Most mortgages these days require clients to have content before a mortgage will be given. If there monthly allowance does not allow for this then the council will be left with empty properties. or properties filled with Council Tenants with</p>

no insurance which when the worse happens will be looking to the council for temporary housing as well as needing assistance in getting back on their feet.

Therefore for the above reasons, this plan is undeliverable and not in line with the NPPF. Floods 2014

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr &amp; Mrs Ronald Searle (40271649)</b>
<b>Organisation:</b>

<b>Response ID: 1125652</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
It is with regret and sadness that I feel I am having to send this email for the following ::: Having lived in Stanwell and now Staines for over 60 years of course I would expect to have seen changes, Heathrow expansion with residents loosing their homes, warehouses with large lorries going through Stanwell High St, flats upon flats being built that are not suitable for families with children who have no garden to play , doctors to see or schools to deal with children who often English is not their first language now the High Street are loosing more shops to be replaced with yet more yes flats. The locals have seen how much vandalism etc is often caused by people who are outsiders and do not care what damage they cause properties should be for the people who would like to get a mortgage and live in a house there should not been a need to bring people from say the North or London keep to

local because we are getting fed up with our green spaces our historic building Ashford College and Debenhams being used without adequate parking and other infrastructure to help.  
Don't turn Staines upon Thames into Feltham and Hounslow etc Stand up to these developer's who do not live or care its just about the money.. We will living on top of one other with no space or privacy which it turn will cause resement because of noise, parking etc.  
I realise we need to live but often these buildings are empty for ages and some rental have no respect for their accommodation and leave it in a disgusting state.  
We need more shops in the High street for clothes for the mature woman who don't want to shop online and a Range or Dunelm to bring in people jobs etc.

**Question 6:** You can upload any modifications below.  
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?  
Yes/No/Not answered: No Response  
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Elia Seoanez (41768289)</b>	
<b>Organisation:</b>	
<b>Response ID: 1124239</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>Hi ,</p> <p>I am writing regarding the subject green belt which is under threat from unscrupulous selfish planning.</p> <p>While the whole world is working to save the planet Spelthorne council is in no hurry to save the green surroundings we are blessed with.</p> <p>This is already causing stress to the residents of the area. We will be deprived of the calming fare reaching views. We value our seclusion and privacy. We want to retain our natural light and beauty. We do not want to be subject to additional traffic and footfalls.</p> <p>I am writing to you to make sure no building takes place on the green belt at Groveley road and Oakhall drive</p> <p>Thank you,</p>	
<b>Question 6:</b> You can upload any modifications below.	

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ron Shadbolt (40999393)</b>
<b>Organisation:</b>

<b>Response ID: 1112357</b>
<b>Policy / Evidence Base / Part of Plan: Policy SP1: Staines-upon-Thames</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Staines Plan Do not want 1) Do not want any more High-Rise buildings 2) Do not want a hotel by the river bridge. There are enough Hotels. 3) Do not want to be part of greater London 4) Do not want anymore shops to shut in High Street What is wanted 1) Low level buildings

- 2) An indoor market in the old Debenhams building
- 3) Area along riverside to become a Conservation area. Improve the foot path and seating.
- 4) Make the old fire engine building a snack bar and build a Victorian Style Conservatory at the rear of the old Town Hall
- 5) Encourage Tourism
- 6) Improve the Staines bypass

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: David Shafik (41483041)</b>
<b>Organisation:</b>

<b>Response ID: 1124072</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I wish to Object to the above proposals on the grounds that Green Belt Land should be kept as just that. The Green Belt has been an outstanding success over the years in preventing urban sprawl and maintaining a sense of suburbia which is so heavily prized by Sunbury residents. I urge Councillors to think seriously about this.
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
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Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Nick Shennan (42011969)</b>	
<b>Organisation:</b>	
<b>Response ID: 1117532</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
LGS: Ashford Town: Queens Walk Regarding the above, I would like to support protecting this land as a 'Local Green Space' for several reasons – I regularly take walks around the area, both by myself for exercise and unwinding from work (I work from home all the time at present) and with two of my rescue cats who enjoy and explore the surroundings. It was also invaluable as a place to get together for the Jubilee party earlier this year. It is a well-known and well-looked-after local area and I would like to see it stay this way.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Shepperton Shepperton Studios (43052353)</b>
<b>Organisation:</b>

<b>Response ID: 1128858</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
The central premise of the submission is that the Studios (comprising the SSES site) is removed from the Green Belt. This can be justified on a number of grounds which together constitute exceptional circumstances. In preparing the Local Plan, the Council must fully address a number of specific issues. SSL's main interest is the Studios and to ensure that the Local Plan meets its specific needs in order to protect its long-term future and maximise its potential. This in turn benefits the area through jobs created and supported, investment in the supply chain and the contribution to economic growth. Given the emphasis on delivering sustainable economic growth through the planning system, and the prioritisation of the digital and creative industries by the Government, the development of a policy framework, through the emerging Local Plan, which provides a favourable policy framework to secure growth of the Studios and meet its

future needs should be integral to the process.

This requires alterations to the Green Belt boundaries. SSL firmly believes that there is a compelling case for the emerging Local Plan to remove the SSES site from the Green Belt.

The Existence of Planning Permission for Major Development across the SSES

Despite the importance placed on economic growth through the Council's Economic Strategy and the strategic objectives of the emerging Local Plan, it is disappointing that SBC do not consider that 'exceptional circumstances' exist to justify Green Belt release. The extant planning permission for SSES (ref. 18/01212/OUT) alongside subsequent reserved matters approvals represent a major, comprehensively planned development on land currently designated as Green Belt. The planning permission is currently being implemented with significant construction already on site as shown at Appendix 5.

The committee report to the outline permission demonstrates that the Council accepted that very special circumstances exist, which by the Council own admission is a higher bar than the demonstration of 'exceptional circumstances'. The Secretary of State did also not seek to 'call-in' the planning decision, accepting the Applicant's case and the Council's decision.

We do not intend to repeat the very special circumstances case however, the committee report is included at Appendix 6 for reference.

The existence of an extant permission, granted following acceptance that very special circumstances exist, which is implemented and under construction, is considered to represent part of the case that exceptional circumstances justifying altering the boundaries of the Green Belt through the emerging Local Plan.

The SSES no longer fulfils any of the purposes of the Green Belt and therefore there is no longer any reason to continue to include it as part of the Green Belt.

(See attached document for more detail)

Strategic Policy 2: Planning for the Borough

Policy ST2 (Planning for the Borough) outlines the development strategy for the area.

Section 2 of the policy outlines the support for economic growth in Spelthorne. The

policy notes that economic growth will be maintained and intensified by safeguarding employment land, providing new employment land as identified in up-to-date evidence, and encouraging innovative re-use of employment land.

SSL supports the economic growth strategy identified in Policy ST2 as it is important for Spelthorne to encourage economic development in the Borough in order to have a prosperous economy.

SSL particularly supports the second bullet point in section 2 of Policy ST2 as it acknowledges that up-to-date evidence is the most appropriate way to inform whether additional employment land is required, and where.

SSL also encourages the third bullet point with regards to the re-use of employment land as this ensures the best and most appropriate use of land and helps to avoid redundant employment uses such as the overprovision of office space.

However, despite acknowledgement within the Strategy to SBC's 'long-standing relationship with major employers and businesses' including the Studios as one of the biggest employers in the Borough alongside the reference to SSES at paragraph 5.17, SBC has failed to include SSES as part of the Strategic Employment Area at Shepperton Studios.

SSL consider that in line with point 2.2 of the policy, the ELNA, draft proposals map and Policy EC1 discussed above, SBC need to include the SSES as a Strategic Employment Area.

Section 5) of Policy ST2 is also supported as it acknowledges that development should make a positive contribution to achieving relevant climate change targets and Biodiversity Net Gain (BNG), however, this should be at a scale proportionate to the development proposal.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

ST2

The addition of the wording "at a scale proportionate to the proposal" is very important in this policy as it allows for flexibility and allows for

development proposals to be considered by a site-by-site basis as not all development sites are the same and will have different challenges for being able to achieve BNG or sustainability ambitions.

**Overall**

The plan provided at Appendix 7 identifies the suggested Green Belt boundary. The boundary has been drawn to reflect the permission site boundary – as a major development supported by a robust long-term business case – which is under construction and expected to be substantially complete by Winter 2023.

This ensures that the boundaries are long-term and will not need to be altered at the end of the Plan period and as such can be regarded as permanent boundaries, an essential characteristic of the Green Belt.

**Question 6:** You can upload any modifications below.

Shepperton Studios Representations - Pre-submission Spelthorne Local Plan\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618809/PDF/->

[/Shepperton%20Studios%20Representations%20%2D%20Pre%2Dsubmission%20Spelthorne%20Local%20Plan%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618809/PDF/-/Shepperton%20Studios%20Representations%20%2D%20Pre%2Dsubmission%20Spelthorne%20Local%20Plan%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: SSL welcome the opportunity to continue engaging with Spelthorne Borough Council and would like the opportunity to be present at relevant sections of the Local Plan Examination.

<b>Respondent: Shepperton Shepperton Studios (43052353)</b>
<b>Organisation:</b>

<b>Response ID: 1128867</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy SP2: Ashford, Shepperton and Sunbury Cross
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Section 1 of Policy SP2 is widely supported by SSL. However, the policy wording should be amended to recognise that there are now new development sites located within the Green Belt which have been developed and completed since the previous Local Plan. As a result of the completed built development, these sites are now identified as previously developed land as defined within the Framework. Paragraph 149 of the Framework identifies the exceptions for development within the Green Belt. Section (g) of Paragraph 149 states that the redevelopment of previously developed land would be considered as an exception and therefore development on PDL within the Green Belt should be considered acceptable. This further reiterates the need to remove the areas recently developed at Shepperton Studios site from the Green Belt as development is already considered acceptable

under the provisions of the Framework.  
Section 8 of Policy SP2 outlines that new developments will be 'expected to' incorporate renewable and zero carbon energy solutions, including opportunities for Air Source Heat Pumps (ASHP) and district heat networks or suitable alternative.  
The inclusion of the wording 'expected to' is supported as this provides flexibility in the policy for development sites to consider renewable and zero carbon energy solutions as part of the proposal, where feasible, but also gives the opportunity to not include these measures if it is not appropriate for the site.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

Shepperton Studios Representations - Pre-submission Spelthorne Local Plan\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618810/PDF/->

[/Shepperton%20Studios%20Representations%20%2D%20Pre%2Dsubmission%20Spelthorne%20Local%20Plan%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618810/PDF/-/Shepperton%20Studios%20Representations%20%2D%20Pre%2Dsubmission%20Spelthorne%20Local%20Plan%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Shepperton Shepperton Studios (43052353)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128868</b>	
<b>Policy / Evidence Base / Part of Plan: Policy E2: Biodiversity</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: Sections 5– 8 of Policy E2 refers to Biodiversity Net Gain (BNG) and outlines that the Council will seek at least 10% BNG on new development sites. Section 8 provides a hierarchy for the delivery of BNG which outlines that BNG should be provided on site
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
SSL suggest the wording for Section 8) is updated in line with the following: "8) Biodiversity net gain should be delivered using the following hierarchy: i. On site as part of the development; ii. Where on-site delivery is not feasible then this should be provided on land adjacent to, or as close to the development site, as possible;	

iii. Where the above is not feasible, net gain should be secured on land within the Borough boundary;  
iv. As a last resort, net gain should be secured on land outside the Borough boundary”

**Question 6:** You can upload any modifications below.

Shepperton Studios Representations - Pre-submission Spelthorne Local Plan\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618811/PDF/->

[/Shepperton%20Studios%20Representations%20%2D%20Pre%2Dsubmission%20Spelthorne%20Local%20Plan%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618811/PDF/-/Shepperton%20Studios%20Representations%20%2D%20Pre%2Dsubmission%20Spelthorne%20Local%20Plan%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Shepperton Shepperton Studios (43052353)</b>
<b>Organisation:</b>

<b>Response ID: 1128866</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy EC1: Meeting Employment Needs	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: SSL do not consider that the employment policies are currently sound for the following reasons: <ul style="list-style-type: none"> <li>• The approach taken to SSES is not justified given it fails to identify SSES as a Strategic Employment Area which forms a fundamental part of the operation</li> </ul> a
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Part 1 of Policy EC1 is supported by SSL given it focusses upon maintaining and intensifying the use of the Borough’s existing floorspace, which is to be achieved through safeguarding employment land and the provision of new land based upon the Council’s most recent evidence. The existing Studios is re-assessed within Table 14 of the ELNA supported by the following comments: “Shepperton Studios forms part of the Pinewood Studios Group and are recognised as a	

key component of UK industry. The studios are a major local employer, for whom various permissions have been granted for redevelopment of parts of the site to meet future needs.”

SSL strongly support reference to the employment designations for the existing Studios being retained and being designated as a ‘Strategic Employment Area’ for the purposes of the emerging Local Plan.

However, SSL contends that SSES currently falls within Part 1 (2) of the policy as part of the provision of new land to meet the Borough’s employment needs to 2037. By virtue of the SBC granting planning permission for 1.2 million sqm of floorspace to meet the needs of Shepperton Studios, SSES should be identified as a Strategic Employment Area, consistent with the existing studios, to ensure it is safeguarded over the plan period. Significant construction is underway and its delivery and operation will make a significant contribution to job growth within the Borough and ensure the sustained growth of the local and national economy.

It is noted that there is no reference within the ELNA to the SSES which is concerning given it is a significant employment commitment within the Borough, which is under construction.

Equally, there is no recognition of the role the site plays in supporting the creative industries across England nor the importance of facilitating a policy framework within which changes in economic circumstances can be accommodated.

Reference within the ELNA to the SSES would be welcomed particularly given this is SBC’s most up to date employment evidence and the designation of the existing Studios and the SSES as a Strategic Employment Area should be recommended for inclusion within the emerging Local Plan to accord with Paragraph 82 of the Framework.

SSL do not consider that the existing Studios and SSES should be considered separately in policy terms and in doing so could significantly undermine the ability for Shepperton Studios to ‘build on its strengths, counter any weaknesses and address the challenges of the future’, which is a key focus of Paragraph 81 of the Framework.

The inclusion of SSES will not require an amendment to the policy, but rather an enlargement of the Strategic Employment Area at Shepperton Studios on the draft proposals map in line with the site boundary included at Appendix 1 of this report.

This amendment will ensure that the Studios can capitalise on its performance and potential thus protecting its role as a key economic provider within the Borough. It will further provide the operational flexibility needed to adapt to the requirements of the industry and maintain its prominent status in the global industry.

With regard to part 2 of the policy, the content of this element aligns with the requirements of Section 8 of the Framework. This element of the policy is supported as it allows for flexibility to cater for the changing needs of the economy. This flexibility is very important for the longevity of the Shepperton Studios and will help future proof its role as a Strategic Employment Area. This is also in line with Paragraph 81 of the Framework which outlines that planning policies should help create the conditions in which business can invest, expand, and adapt.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: SSL welcome the opportunity to continue engaging with Spelthorne Borough Council and would like the opportunity to be present at relevant sections of the Local Plan Examination.

<b>Respondent: Janet Sherman-Clark (41993889)</b>
<b>Organisation:</b>

<b>Response ID: 1117300</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I urge you to maintain ALL current green space in Spelthorne.
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

Representations Made Under Regulation 20  
in Representor Order

<b>Respondent: Cllr Robin Sider (42100897)</b>	
<b>Organisation:</b>	
<b>Response ID: 1119442</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
For consideration for inclusion as Local Green Space Junction of Shepperton High St and Cliveden Place A small area in the built-up High Street in Shepperton offering a much-appreciated green space. Local community volunteers already look after the provision of flowers in various beds down the High St and this green area offers a tree-planting opportunity to support the community's existing efforts to encourage bio-diversity and wildlife here.	
<b>Question 6:</b> You can upload any modifications below.	
For consideration for inclusion as Local Green Space - Shepperton cllrs_Redacted.docx	

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618971/DOCX/-/For%20consideration%20for%20inclusion%20as%20Local%20Green%20Space%20%2D%20Shepperton%20cllrs%5FRedacted%2Edocx>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Sean Silk (32720481)</b>
<b>Organisation: Mr Carl Homerstone, UA Asset Management 2 ICP Partnership Ltd</b>

<b>Response ID: 1128554</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
SPELTHORNE DRAFT LOCAL PLAN – REGULATION 19 CONSULTATION LAND EAST OF LONG LANE, STANWELL – PROPOSED COMMERCIAL DEVELOPMENT Further to submission of a completed Comment Forms by the due date, we have been asked by those with control over 3.6 hectares of land to the east of Long Lane, Stanwell (“the Land”) to provide supplementary information. This seeks to explain the rationale and reasoning behind asking for the Land to be released from Green Belt and/or allocating it for commercial, economic development. This would then facilitate the Land coming forward to provide commercial development that would assist deliver key objectives for the expansion of Heathrow under Draft Policy SP7, alongside allocations of other land nearby under Draft Policies SN1/006 ‘Land West of Long Lane’ and EC1, the Strategic Employment Areas both west and east of Bedfont Road. Green Belt The National Planning Policy Framework (“NPPF”) confirms the Government’s ongoing commitment to Green Belt and the five purposes that Green Belt provides, in this case principally “...to check the unrestricted sprawl of large built-up areas...” but also “...to assist in urban regeneration, by



encouraging the recycling of derelict and other urban land..." (NPPF paragraph 138). The NPPF goes on, at paragraph 139 and then at paragraph 140, to note that Green Belt boundaries should be changed only where there are "...exceptional circumstances..." and that these are "...fully evidenced and justified, through the preparation or updating of plans..." Spelthorne Borough Council ("the Council") has identified a need to release land from Green Belt, the only option available in order to meet demands for development imposed upon it by Central Government. This meets the requirements of NPPF paragraph 141. Paragraph 142 of the NPPF then goes on to advise that when the need to review Green Belt boundaries has been established then "...plans should give first consideration to land which has been previously-developed and/or is well served by public transport..." going on to note that any land removed from Green Belt should be 56394516.1 2 "...offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land..." The NPPF then, at paragraph 143, 6 'tests' for Green Belt boundaries to pass. At least two of these tests are not met by including land east of Long Lane, namely "...land which it is unnecessary to keep permanently open..." and where land can have the boundaries defined clearly "...using physical features that are readily recognisable and likely to be permanent..." Of the remaining four tests, the two relating to Safeguarded Land are relevant only in the event that the Council feels it reasonable and appropriate to safeguard land to the east of Long Lane solely for commercial development directly related to the approved expansion of Heathrow Airfield. The remaining two tests would then come in to play when this land is identified to meet wider, less specific strategic needs and to ensure that the Green Belt boundary in this location need not be altered again in the future. Assuming therefore that the Council's reasoning behind releasing land from Green Belt is found to be sound and fully justified in due course, the land east of Long Lane then meets the requisite tests to going some way to meet this identified need. As previously developed and/or urban derelict, this land is well placed to provide much-needed strategic commercial development, either directly or indirectly related to the approved plans for expanding Heathrow Airport. The land and its development can be sustainable and is or can be well served by public transport. If not removed entirely, the reviewed Green Belt boundary can be identified clearly, with the development offering significant, material and compensatory economic, social and environmental benefits. For the reasons set out, it is commended that the land east of Long Lane, Stanwell, be removed in full or in part from Green Belt. Non Green Belt Commercial Development In the event that the land east of Long Lane is taken out of Green Belt, in part or in full, the commercial development on this land can be sustainable and accessible by public transport. It is envisaged that the land could provide up to 14,000sqm of commercial floorspace, predominantly storage and distribution. Alongside, there is an opportunity to provide a significant amount of more open uses such as car and lorry parking. The land could be identified as Safeguarded Land, specifically for the purposes of serving, directly or indirectly, the needs arising from the approved expansion of Heathrow Airport. Alternatively more flexibility could be offered by allocating the land for commercial development/employment generating land. Very Special Circumstances – Green Belt Commercial Development If the land east of Long Lane is to remain in Green Belt then the NPPF provides guidance on what could be considered as appropriate uses in the Green Belt and then w

**Question 6:** You can upload any modifications below.

Silk, Sean - Spelthorne R19 Stanwell Letter\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618927/PDF/-/Silk%5F%20Sean%20%2D%20Spelthorne%20R19%20Stanwell%20Letter%5FRedacted%2Epdf>



**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mary Simmons (41658017)</b>
<b>Organisation:</b>

<b>Response ID: 1124233</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
We are writing to express that in our opinion the expansion a housing development on to the Green Belt area beside the Running Horse should not go ahead.
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Charlotte Smith (19549217)</b>
<b>Organisation: Guildford Borough Council</b>

<b>Response ID: 1113636</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Please see attached representation.
<b>Question 6: You can upload any modifications below.</b>
GBC Response to Spelthorne Reg 19 LP.docx <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/575230/DOCX/-/GBC%20Response%20to%20Spelthorne%20Reg%2019%20LP%2Edocx">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/575230/DOCX/-/GBC%20Response%20to%20Spelthorne%20Reg%2019%20LP%2Edocx</a>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

**Respondent: Mr David Smith (42037665)**  
**Organisation:**

<b>Response ID: 1124626</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
I would like you to know I oppose your latest plan, and even though new housing is needed, I do not believe this need outweighs the need for green spaces. I hope you will reconsider this plan and seek redevelopment sites elsewhere.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Greg Smith (42425089)</b>
<b>Organisation: Redrow Homes (Kempton Park)</b>

<b>Response ID: 1122684</b>
<b>Policy / Evidence Base / Part of Plan: Evidence base - IDP</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
The Infrastructure Delivery Plan (Part 1) was first published only on 26 <sup>th</sup> April 2022. As such, one could maybe assume it would be relatively complete and up-to-date having been in development for a couple of years. However, it is sadly lacking essential detail and many parts are already out-of-date. There is no overview and no conclusions to speak of apart from two short paragraphs at the end of the last chapter. The IDP Part 2, first published on 10 <sup>th</sup> May 2022, offers only partial information and no overview.
The comments made in the officer site assessment in the DAAS, June 22 were made on proposals that assumed the potential relocation of at least some of the racecourse car park to greenfield areas in and around the racecourse.
2.2 Further assessment of the parking requirements associated with the racecourse, and further work with regards to the capacity of the site and ability to retain/reprovide parking within the PDL site alongside residential development, have determined that this is no longer the case.

2.3 All parking requirements for the proposals will now be located within the PDL site or within areas already permitted for parking. All comments in regard to loss of biodiversity, an impact on flooding in areas to the east of the racecourse and a loss of openness in terms of impact on the Green Belt, due to parking reallocation can now be disregarded.

2.4 Within the site information section in response to: 'is the site located in previously developed land?' The officer statement states:  
"Mixed – hardstanding occupies most of the site"

2.5 The PDL site is on 100% previously developed land.  
Response to comments regarding landscape character  
Existing landscape character assessment

3.1 Under the Sustainability Appraisal (SA) Objective number 8, page 357 of the DAAS, June 22, the officer comments state:

"This site is previously developed land however given the scale, there is potential to negatively impact the borough's landscape character"

3.2 The 2015 Surrey County Council landscape character assessment identifies the site as being within landscape character type UW "significant greenspace within urban areas", which is sub-divided into landscape character areas, with the site lying within UW3 – Kempton Park.

3.3 The proposal will introduce new development to the site, into an area that is currently mostly used for surface car parking but does contain a number of portacabin buildings for stands as well as structures such as floodlighting. For proposed heights of the proposals see figure 1. It is notable that the site is well related to the adjacent residential area of Sunbury and the built elements of the racecourse and as stated throughout the DAAS, June 22:  
"there is likely to be opportunity for higher density development, with the potential to tap into the sustainable transport locations near Kempton Park Railway Station..."

3.4 One of the key characteristics given for all landscape character types within the UW group of individual areas is that they:  
"Provide a visual and physical break of rural or natural open character within the Built-Up Area"

3.5 Grandstands and other tall structures including flood lighting predominate as characteristics along the western edge of Kempton Racecourse. Development within the PDL site will not alter this key characteristic. The open more semi natural character of the racecourse and the open areas of grassland and lakes towards the east of the racecourse will remain intact to provide a visual and physical break to the built-up areas.

3.6 The actual key characteristics specifically for Kempton Racecourse are provided in the character assessment for area UW3 – Kempton Park. Of relevance are the following:

- "...Contains Kempton Park Racecourse, plus fields, water bodies and woodland to the east
- Although there are glimpses of the Grandstand buildings, perimeter vegetation and buildings filter views into the race course. Elsewhere the grounds are ringed by a variety of fencing and walls
- There are no public rights of way or roads through the area
- Parts of the grounds are covered by a variety of ecological designations,

including a small part of the South West London Waterbodies Special

Protection Area. Kempton Lake and Half Moon Covert SNCI was selected for its importance for birds, including heron, but also its important grassland and swamp habitats

- Although providing a visual relief from surrounding Built Up Areas, this is a private landscape. Although not readily accessible physically to the residents of the surrounding urban area, long open views across the site are available from the southern frontage along Staines Road East.”

3.7 The proposals will not significantly alter any of the key characteristics for UW3 listed above.

Response to general officer comments regarding landscape character

3.8 Under Stage 3c – Visual Amenity, page 361 of the DAAS, June 22, the officer comments state:

3.9 “The proposed development site is somewhat urban in character given its close proximity to the Sunbury built up area, however its current strong associations with the wider racecourse give it a sense of rurality”

3.10 We find it difficult to understand how a vast area of hard surfaced car parking surrounded by lighting columns, signage, tall grandstands, stables blocks, boundary walls and fencing and numerous other buildings associated with the racecourse in an area adjacent to the urban edge of Sunbury can possibly be termed as “somewhat urban”. The PDL site is urban.

3.11 Furthermore, most of the hardstanding areas, especially within the north of the site are screened off from views of the racecourse. Notwithstanding this point, we fail to see how the PDL element of the racecourse can be termed a rural landscape or how the racecourse can provide a sense of rurality to a car park in this location – located generally between built development.

3.12 We agree with the comment on page 361 of the DAAS, June 22 which states:

“Aside from some trees lining the site, the carparking area currently does not include and valued landscape character features”

3.13 Further on in the officer assessment on visual amenity, page 361, in describing the boundary treatment to the south of the racecourse the officer comments state how this boundary treatment:

“...does however contribute to the rural feel of this part of the road and provides a sense of transition and separation from Sunbury to Hampton, even without being able to see into the site.”

3.14 The proposals will not alter this observation, and we disagree that a hedgerow adjacent to the racecourse boundary fence can be seen to provide a rural feel as you pass along the busy A308 Staines Road East with residential properties lining the south of the road opposite the racecourse.

4.0 Response to comments regarding visual amenity

4.1 As stated by the officer in Stage 3c – Visual Amenity, in the closing paragraph on

“A development of this scale, character and height would have a significant visual impact on nearby and more distant views of the site and from multiple vantage points.”

4.2 Figure 2 indicates the zone of theoretical visibility (ZTV) and has been prepared using the heights of proposed development indicated on Figure 1. This has been

mapped using specialist computer software and 1m Lidar data producing a digital surface model. This figure clearly illustrates that the officer comments that there will be more distant views of the site from multiple vantage points is not the case.

4.3 The visual splay is remarkably small. It is contained to the south by the existing hedgerow boundary treatment along the A308 Staines Road East, with only a small area of visibility extending beyond the racecourse boundary opposite the southern racecourse entrance. There are no views from the west.

4.4 From the north there is a very short length of Snakey Lane from where views may be afforded and from an exceptionally small area within Hanworth Park. There are also areas along the A316, especially on the elevated sections immediately north of the PDL site. There will also be views of the proposals from Kempton Park Station. The remaining small areas of visual splay are across areas that are not publicly accessible.

4.5 To the east, views will be restricted to the residential roads of Park Road and the A308 Staines Road East immediately adjacent to the site and from small sections of residential roads behind these roads when views are orientated towards the PDL site. Examples of these are sections of Oak Grove, Hamilton Place, The Avenue and Kempton Avenue. The only remaining area of visibility in the west is from within the Kempton Cricket Club, although this is a private club and therefore not publicly accessible.

4.6 The only significant visual effects are predicted to be limited to the users of these residential areas immediately adjacent to the western edge of the site. In regard to these impacts, the majority of the proposed development, as viewed from the A308 Staines Road East, will be viewed above the boundary wall as a broken line of development between 19.5 and 10m high, set back from this boundary wall and lower in height than the existing 23m high Festival Enclosure, which is presently visible when travelling northwards as the road passes Kempton Avenue.

4.7 There are no proposed buildings at the junction of A308 Staines Road East and Park Road in order that the “iconic” Grandstand ranging between 29 and 32m high, with its taller roof elements at 42m high would remain clearly visible.

4.8 With a maximum proposed height of 26m, the taller elements will be visible from elevated sections of Park Road as it passes over the railway, from elevated sections of the A316 and from the areas further north, as described above. However, these will be markedly smaller than the Grandstand and will also be viewed in the context of taller buildings within Sunbury Cross.

Analysis of the assessment of the Green Belt contribution of the PDL site

5.8 In using the Arup methodology to assess the PDL site against its contribution to Green Belt it has been assessed as performing weakly. It scored 1 for purpose 1 – sprawl, and 0 for purpose 2 – merging, 0 for purpose 3 – encroachment and 0 for purpose 4 -historic setting.

5.9 The assessment of the PDL site shows that all the officer comments raised in the DAAS, June 22 no longer apply. Development of the PDL site and its release from the Green Belt will create only a very limited visual impact upon the openness or rurality of the surrounding Green Belt land to the north and east and will not constitute sprawl, reduce the importance of the open racecourse area in forming a strategic gap or the racecourse's role in preventing neighbouring towns from merging.

5.10 That said, we would point out that, in terms of the wide racecourse land being described as having a rural character we have argued in previous representations that we do not agree with this statement and consider the remaining open space from the racecourse to the western edge of Portlane Brook to have a semi-urban rather than rural character.

5.11 The PDL site development, along with the existing Grandstand, can adequately create a permanent defensible Green Belt boundary in line with the NPPF, July 2021, paragraph 143, section f.

5.12 Overall, it is considered that the PDL site as a whole is urban and plays a minimal, if any, role in terms of the purposes of Green Belt.

5.13 Further, its removal would not harm the performance and integrity of the wider strategic Green Belt (particularly in relation to Purpose 2).

Openness

5.14 Throughout the officer site assessment there are comments that relate to openness. Namely it is stated that the relocation of car parking within and around the racecourse will create a loss of open land and reduce the openness of the Green Belt. Clearly this statement is inconsistent with the officer's statement that the existing surface parking on the PDL site is 'rural' and 'open'. This highlights the inconsistency and bias inherent in the assessment of the PDL site.

5.15 Nonetheless, as stated earlier, parking will only be located on previously developed land or the area in the centre of the racecourse where parking is already permitted.

5.16 In Stage 3a – Green Belt, page 362, it states:

"...given the large scale of the site, the actual and perceived sense of openness will be drastically reduced."

5.17 We do not agree with this statement. As stated in the officer comments within Stage 3c – Visual amenity, page 361, there are limited views of the site from outside of the racecourse. If this is the case how can the perceived sense of openness be drastically reduced. Views of the open areas of the racecourse are extremely limited, the racecourse is on private land and there are no public rights of way across and adjacent to it. However, it has been argued by Spelthorne Council in the past that while people may not be able to physically see it, it is nevertheless perceived to exist and form the open gap between Sunbury-on-Thames and Hampton.

5.18 The proposals will not drastically reduce this actual and perceived sense of openness. Development on what is already developed land is located on and around areas of the racecourse that are already recognised as developed and 'built-up'. The open racecourse and associated open space, woodland and lakes are to remain unchanged. Therefore, if people can only perceive the openness of this area beyond the existing grandstands, although they can largely not actually see it, then the proposed development will not alter this perception.

5.19 Comments also describe the PDL site as being mostly hardstanding but largely open and free of development and mass. While this may be the case it is still

developed land and not the open racecourse. As such whilst there will be a degree of material impact on its openness, we do not consider this will constitute substantial harm to the openness.

**Question 6:** You can upload any modifications below.

Comber, Emily [Terence O'Rourke] on behalf of Redrow Homes\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618730/PDF/->

[/Comber%5F%20Emily%20%5FTerence%20O%5FRourke%5F%20on%20behalf%20of%20Redrow%20Homes%5FRedacted%2Epdf](#)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Greg Smith (42425089)</b>
<b>Organisation: Redrow Homes (Kempton Park)</b>

<b>Response ID: 1122640</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No	Additional Comments: Spelthorne and Runnymede are part of the same Housing Market Area (HMA). The Runnymede Plan (2015 – 2030) was adopted 16 July 2020. The Examining Inspector (Inspector Report dated 28 May 2020) confirmed that “There is no substantive reason to question the
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>This submission provides detailed comments on the Pre-Submission Spelthorne Local Plan (PSSLP) consultation document on behalf of Redrow Homes (hereafter referred to as Redrow). Redrow have a long-term agreement in place with Jockey Club Racecourses Ltd, the landowner of Kempton Park Racecourse, to promote residential-led development.</p> <p>1.2 The Kempton Park PDL site was submitted to the Call for Sites consultation in March 2021 for consideration. A separate Call for Sites submission was made for the wider Kempton Park site. The Call for Sites submissions are included at Appendix 1 for information purposes.</p> <p>1.3 These Reg 19 representations on the PSSLP focus on the potential to allocate and redevelop the previously developed land (PDL) at Kempton Park (referred to as Kempton Park PDL) for new homes (including affordable homes) alongside other community uses and supporting facilities. This allocation would both safeguard and enhance the ongoing operation of the Kempton Park Racecourse.</p>	



1.4 These representations confirm that the necessary parking provisions required by the ongoing operation of the Racecourse can be accommodated within the Kempton Park PDL site and this will continue to be supplemented by additional parking provision within the central area of the All Weather Track for particular race events under the existing permissions. This supporting evidence is documented in the appended Transport Note prepared by Vectos (see Appendix 2).

1.5 These representations are also supported by an Illustrative Masterplan and Building Heights Plan (see Appendix 3) to demonstrate that it is feasible to accommodate adequate operational car parking associated with the Racecourse within the Kempton Park PDL and that the scale and positioning of new built form is capable of being designed sensitively to minimise harm to the openness of the Green Belt.

1.6 The Kempton Park PDL opportunity in the context of Green Belt release is abundantly clear, and it is fully supported in these representations that, in discounting and omitting the Kempton Park PDL opportunity in the PSSLP, the plan fails in its consistency with the NPPF.

1.7 The proposal would involve the efficient and effective use of a large area of previously developed land, currently located in the Green Belt, in a location that is well served by public transport, including direct access to Kempton Park Station. In the context of national policy, it represents a 'first call' and sound opportunity to meet Spelthorne's housing need and must be preferred (and allocated ahead of) other greenfield sites being released from the Green Belt which are less sustainable, by definition (NPPF paras 142 and 149 g).

1.8 The evidence base does not support the rejection of the PDL opportunity, as highlighted through these representations. Specifically, the site has not been considered by Spelthorne Council in a fair, objective and equitable way relative to the alternatives, as highlighted by our specific criticisms of the Sustainability Appraisal (SA) and Officer Site Assessments, appended to these representations (See Appendix 4).

1.9 Further, the plan is deficient in its approach to housing provision, and supply within the urban areas. It fails to make sufficient deliverable provision, and longer-term provision, which is sufficiently flexible to respond to rapid change.

1.10 The PSSLP is deficient and should be found unsound at examination unless it is updated to include the allocation of Kempton Park PDL for residential purposes.

1.11 The starting point is that the level of local housing need extends beyond the capacity for growth within the urban areas (taking into account the sites available and opportunities to increase densities). Adjacent authorities are similarly constrained to Spelthorne and cannot help to meet the need. Hence, exceptional circumstances are demonstrated to amend the Borough's Green Belt boundary. We fully agree with Spelthorne Council in this respect.

1.12 The next stage must be to provide a spatial strategy that provides for local housing through a sustainable pattern of growth, as defined with reference to the NPPF. The strategy must be consistent with the NPPF. Green Belt release and the influence of other relevant designations must be considered in this context. First consideration must be given to previously developed land and/or land that is well served by public transport (Paragraph 142). Greenfield Green Belt release should be minimised and associated compensation secured. SBC's pre-submission document is contrary to this.

1.13 The spatial strategy is not effective as the identified deliverable and developable sources of housing land supply fall short of meeting the local housing need. Specifically, the plan states that yield has been increased from the SLAA evidence yet there is no explanation for this increase. Further, the supply figures are only discounted by 5%, but given the poor record of delivery from the urban area (where there is already a presumption in favour of residential development), this is overly optimistic and unjustified.

1.14 Further, the plan will fail to achieve a five year housing land supply on adoption. The housing trajectory, in years 1, 2 and 3 (2022/23, 2023/24 & 2024/25), relies heavily on development from Green Belt release sites and from SLAA sites. This equates to circa 800 new homes and all sites are without any kind of planning permission.

1.15 Clearly, the greenfield Green Belt sites (representing inappropriate development) will not be 'released' until the Plan is formally adopted post 2022 and in terms of lead in times for delivery, it would be reasonable to allow for a 12 month planning process and then an additional 2 – 3 year period for site mobilisation and construction. The same delivery timeframe can be expected for high-density urban sites, where site preparation and build period can be longer. With this in mind, it is evident that this delivery expectation in the first four years is unrealistic (noting that we are already almost 6 months through the first year). The trajectory in this respect is unsupported by the clear evidence required by the NPPF (deliverable definition) and PPG, that there will be housing completions within 5 years on these identified sites.

1.16 Taking a robust and realistic approach to this factor of supply alone (i.e. planning timescales, lead in times and build-out rates) for those sites without planning applications submitted, housing completions would not be achieved until 2026 at the earliest and therefore cannot be relied upon. When combining the figures over a 4 year period, this would discount a total of 1,527 homes from the five year housing land supply, reducing the five-year supply from 3,973 homes to 2,446 homes (even assuming as per the trajectory that all existing commitments are delivered in their totality across the first five year period). Against a requirement of 3,708 homes (Spelthorne being an automatic presumption authority under the Housing Delivery Test and needing to apply a 20% buffer –  $(618*5)*1.2$ ), this represents a supply of only 3.3 years (1,262 homes shortfall).

1.17 In short, the Duty to Cooperate has not been met, the SA is flawed and is not legally compliant, and the Reg 19 is clearly unsound. Redrow objects to the SA.

3.2 There are serious flaws in the SA, as set out in detail within Appendix 4 (with regards to Kempton Park PDL) but is summarised here.

3.3 Spelthorne Council has based much of their scoring throughout the assessment on inaccurate and unproven assumptions about what could be delivered on the site which has led to an unbalanced and unequitable assessment.

3.4 For example, as a starting point, there is an incorrect assumption that this PDL site is located within an area of strongly performing Green Belt. Redrow strongly contest this, particularly considering that the PDL site has never been previously assessed in isolation.

3.5 There is also an incorrect assumption that the redevelopment would lead to displaced car parking from the existing hardstanding area into an area of open greenfield land. That would not be the case and these points are rebutted later in these

representations.

3.6 The flaws in the SA have fed through to the Officer Site Assessment – Discounted Alternative Allocation Sites, which demonstrably fails to take a consistent and fair approach to site assessment. A summary of which follows, and is further detailed below in Section 7.

#### Objective 1 – Housing Provision

3.7 Kempton Park PDL performs in the top 50% against draft allocated sites in the Green Belt. All sites perform positively, however 6 of the 15 draft allocation sites have a plus in this category.

#### Objective 2 – Health, Wellbeing & Inequalities

3.8 Kempton Park PDL scores negatively in this category due to the perceived lack of open space and community facilities the site will provide. Kempton Park PDL is also deemed unlikely to address existing deprivation, though, this is not a consideration in any other site assessment. The opportunity to provide a significant number of affordable homes should be deemed as a positive in helping to address existing deprivation.

3.9 In comparison to other Green Belt sites allocated in the Plan, Kempton Park PDL is much more sustainably located to a range of transport links encouraging a greater modal shift in travel. A train station is located directly adjacent to the site and bus routes run along the site entrance. This is not the case for many of the site allocations. The high public transport accessibility levels are not acknowledged at all. Equally, the site is more than capable of providing sufficient open space, with no loss of green space, as is the case with other sites. Overall, it does not appear that the positive sustainability credentials were properly considered in this assessment.

#### Objective 3 – Flood Risk

3.10 All but one site scored negatively in the assessment of Objective 3; HS1/009 Bugle Nurseries scored neutral. It is unclear why this site has been scored any higher than the others as there is acknowledgement that there is potential for groundwater flooding and surface water flooding. The PDL element of the Bugle Nurseries site is given extra credit for having the opportunity to change from hard standing to permeable. The officer's assessment for Objective 3 is inconsistent as this is something that would also be achieved at Kempton Park PDL.

#### Objective 4 – Land & Soil

3.11 Just two out of the 15 Green Belt allocated sites scored neutral in this category. The officer assessed Kempton Park PDL as negative despite the fact that the development will result in the efficient use of PDL, avoiding loss of more valuable agricultural land. The officer's report incorrectly asserts that development would lead to relocated car parking on greenfield land.

3.12 The officer further fails to acknowledge how development at Kempton Park PDL would align with the spatial strategy of higher density development in and around Sunbury Cross.

#### Objective 5 – Air & Noise Pollution

3.13 HS1/009 Bugle Nurseries is the only site to score neutral in this category with the rest scoring negative. This is due to a reduction in noise pollution due to fewer heavy goods vehicles and general waste vehicles coming into the area.

3.14 The SA of Kempton Park PDL fails to consider the proximity of the existing railway station and how development at the site would enable a significant proportion of future residents to access strategic locations sustainably by public transport. A consolidated car parking area and fully implemented Travel Plan is likely to deliver a net reduction in car parking, thereby positively benefiting air quality.

#### Objective 6 - Biodiversity

3.15 All sites where there is a loss of any green space are scored negatively.

3.16 Any site that is PDL scores neutral on the most part. It makes sense that the introduction of areas of open space to PDL should have a positive impact, as is the case at Bugle Nurseries HS1/009, which is noted as having limited biodiversity value due to its current role as part greenfield land and partially developed land.

3.17 The report scored Kempton Park PDL negatively as it was deemed that there would be a loss of biodiversity due to the incorrect understanding that car parking would need to be relocated to open greenfield land within the racecourse. Temporary parking on 4 x event days a year are already permitted and there is no change proposed to that existing arrangement. There are opportunities to enhance biodiversity on-site through various measures that would likely include new tree planting, biodiverse green roofs, use of SUDS, and provision of open green space as part of a regeneration scheme. Air quality improvements would also positively benefit biodiversity on site.

#### Objective 7 - Heritage

3.18 All draft allocation were scored neutral for Objective 7.

#### Objective 8 – Open Space & Landscape Character

3.19 The officer's assessment of Objective 8 at Kempton Park PDL seems inconsistent, with Green 'Belt' and Green 'Land' used interchangeably. The assessment also fails to consider the landscape improvements that would be delivered.

#### Objective 9 - Transport

3.20 Allocated sites have scored positively in comparison to Kempton Park PDL, that are a lot less sustainably located. The most comparable to Kempton Park PDL is RL1/011, which is also 6ha. The officer scored this site neutral as the impacts on traffic and congestion can be offset by the improved sustainable travel options, however the opposite conclusion is reached at Kempton Park PDL. The site has highly sustainable transport links given the proximity to the station; however, this is not acknowledged in the officer's assessment. This is a critical flaw in the assessment of the site.

3.21 The assessment of sites for Objective 9 seems to be bias, as some sites that are disconnected from services and will not encourage active travel are scored neutral when they should be negative.

#### Objective 10 – Economic Growth

3.22 Kempton Park PDL performs positively for Objective 10. Other sites assessed are also scored positively with some scored neutrally.

Objective 11 – Resources and Low Carbon Economy

3.23 Kempton Park PDL is assessed as negative for Objective 11.

3.24 It is considered that the officer assessment at Kempton Park PDL is inconsistent and inequitable with the assessment of options SN1/006, AT1/002, LS1/024 and HS1/002, as the officer scored each of them neutral, on the basis that they will provide an opportunity to incorporate renewable or low carbon resources and promote sustainable development. The proposed use at Kempton Park PDL will also provide an opportunity to incorporate renewable or low carbon energy sources and promote sustainable development to tackle climate change, however, this is not considered.

3.25 Furthermore, the reasoning that construction activity and associated increased traffic would result in a negative score is also applicable across all allocations (and all developments). However, this issue was not raised in the assessment of other sites which strongly indicates bias against the site. These are matters which are capable of mitigation in the normal way, through both planning conditions and legal obligations.

Objective 12 - Water

3.26 Kempton Park PDL is assessed as negative in this category. All other sites assessed are also scored negatively as each proposed scheme will result in additional water consumption.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

For the Kempton Park PDL site to be released from the Green Belt and included as an allocated site for residential-led development up to circa 500 homes which will greatly assist the Borough meet the significantly increased housing requirements against a historically poor record of delivery of both market housing and affordable housing. This is in the context of the Council's own admission that they cannot demonstrate a deliverable 5 year housing land supply and that other less sustainable and much smaller greenfield sites have been selected for Green Belt release ahead of this well connected, previously developed site.

**Question 6:** You can upload any modifications below.

Comber, Emily [Terence O'Rourke] on behalf of Redrow Homes\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618723/PDF/-/Comber%5F%20Emily%20%5FTerence%20O%5FRourke%5F%20on%20behalf%20of%20Redrow%20Homes%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: We have fundamental objections to the legal compliance and soundness of the plan and wish to have the opportunity to fully air these objections before the Inspector. In addition, given the numerous ways that we deem the Council has failed to properly consider this strategic site for Green Belt release and its potential significance to the underling success of the Local Plan to meet the

Borough's pressing housing needs, our client has requested that we attend to present our case verbally and be able to contribute to any relevant discussions during the examination. This will afford our client the opportunity to respond directly to any arguments made during the course of the examination that resist its inclusion as one of the allocated sites and be available to provide any further information that may be deemed necessary by the appointed Inspector(s) to aid their considerations.

<b>Respondent: Mr Greg Smith (42425089)</b>
<b>Organisation: Redrow Homes (Kempton Park)</b>

<b>Response ID: 1122675</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Redrow objects to this policy and associated Table 1. 4.3 Spelthorne will need to achieve a step change in housing delivery, which has averaged only 323 net housing additions over the last seven reporting years (2015/16 – 2021/22) if it is to meet its LHN during the plan period. This step change can only be achieved through the release of a number of sites from the Green Belt and allocating them to meet identified housing needs. It cannot be achieved by relying almost entirely (90%) on supply from urban capacity. Nothing has changed in terms of the urban capacity in recent years, there has been a presumption in favour of releasing land for residential development in the urban area and yet Spelthorne remains an automatic presumption authority under the HDT. The plan offers no 'game-changer' in this respect which could otherwise generate a significant uplift in

annual delivery rates achieved primarily from the urban areas.

4.4 The clear evidence is that urban capacity is not being released at the rate now anticipated by Spelthorne Council in the plan. There is no evidence to justify significantly enhanced rates of delivery in the urban area. The plan is unjustified.

4.5 More specifically, as set out at PSSLP Table 1, SBC's estimated supply of land over the new Local Plan period 2022-2037 is capable of providing 9,439 new homes from a variety of sources, including Allocations, Brownfield Tier 2 Sites (> 5 units), Windfall: Small Sites, Windfall: Office to Residential Permitted Development and Homes Under Construction.

4.6 The Housing Trajectory that has been prepared in support of the latest version of the Local Plan is considered to be highly unrealistic when considering past trends of delivery and completions. The Spelthorne Council is projecting that a net total of 3,973 homes will be completed in the next 5 years (2022 – 2027), equating to an average of 795 net completions per annum. Considering that over the last 11 years the Council have only delivered an average of 277 homes per annum, this would represent a 287% increase on past trends, whilst relying almost entirely (without any change in the baseline position of local context) on the same sources of supply that have been and continue to be available in the existing urban area.

4.7 Similarly, the next 10 years of the trajectory are overly-ambitious, with 5,466 net homes projected to be completed, equating to an average of 547 homes per annum, a 197% increase on past trends.

4.8 There are also a number of significant shortcomings with the approach that SBC has used to identify deliverable and developable sites, especially relating to their availability, achievability and viability. The allocated sites include the redevelopment of community centres, leisure centres and playing fields, although the need for their retention, or the ability to secure provision elsewhere, has not been established. If these sites can only come forward if their use is re-provided elsewhere first, it does not seem credible to identify these sites as being either deliverable or even developable.

4.9 The NPPF states that in order for major sites to be deemed 'deliverable', there should be a realistic prospect that housing will be delivered on the site within 5 years, i.e. they should already have detailed planning permission or there should be clear evidence that that housing completions will begin within 5 years. To be considered developable, within the 6 – 11 year period, there must also be a reasonable prospect that sites could be viably delivered at the point envisaged.

4.10 As stated previously, a significant number of homes that are identified as being deliverable within the first 5 years are Green Belt sites (721 homes) and 82% of these homes would be delivered on larger sites that can accommodate 60 homes or more. They cannot come forward in advance of the plan process, unless very special circumstances can be demonstrated. Only one such site, permitted on appeal, has planning permission.

4.11 Of the numerous other allocated sites in the urban area that make up the first 1 – 5 years of the borough's housing supply, only one site has planning permission. These sites without planning permission total 976 homes and when combined with homes to be delivered on the released Green Belt land, there is a total of 1,697 homes of the 5 year housing land supply that does not have planning permission. This is more than half of the Council's annual requirement of 618 homes (2.7 years supply).



4.12 In our view, the identified sites do not adequately meet the definition of being 'deliverable' as the plan lacks clear evidence that there is a realistic possibility of these sites starting completions within the next 5 years. We note that a number of these allocated sites have been brought forward from the 2021 SLAA where they were previously identified as being 'developable' over the 6 – 10 year timeframe, but no explanation has been provided to justify why they are now considered to be deliverable.

4.13 There has also been a significant increase in the number of site allocations in Staines upon-Thames, where there is a total of 3,882 homes proposed, which represents 50% of all identified sites. These form part of the Council's vision in the Draft Staines Development Framework SPD to bring forward significant and transformative change to the town centre through a series of high density, mixed-use regeneration schemes.

4.14 There are a significant number of larger sites (those which propose 100+ homes) which have been identified within the Staines urban area, with 11 x allocated sites comprising a total of 3,371 homes. 70% of these homes are planned to be delivered on just 4 x allocated sites, namely the Two Rivers Retail Park, the Elmsleigh Shopping Centre, the Builders Yard and Birch House. The homes are not being equally distributed across the borough and this is contrary to the Council's own dispersal strategy.

4.15 The proposed housing supply is dominated by large sites. Of the 55 allocated sites, 19 of these would provide over 100 homes, contributing 5,094 new homes. This equates to 84% of the allocated land and 54% of Spelthorne's housing supply.

4.16 We would highlight that development of this scale within constrained urban areas will normally take a longer period to come forward through a master-planned approach and in a number of development phases. They often need to resolve complex planning challenges through a lengthy pre-application and then planning determination process and require more time for the various stages of community engagement to take place as sites of this nature tend to be both locally and politically sensitive.

4.17 In our experience, larger scale development will generally have greater complexity from a viability perspective, in terms of satisfying the aspirations of the Council and the local community whilst ensuring that a redevelopment scheme remains viable and deliverable. Two of the sites are in public sector ownership and significant funding will be required for these sites, alongside the necessary funding for infrastructure improvements within the town centre more widely. We note that at this stage,

Spelthorne Council has not identified any joint-venture partnerships to assist them with bringing forward developments of this magnitude, which the NPPF (para 73d) suggests is necessary to support rapid implementation.

4.18 In this context, it is unrealistic to expect this quantum of development to come forward within the same area of the borough in this timescale, particularly when the compelling evidence of historic trends of delivery is taken into account.

4.19 The SLAA Update 2021 states that site capacity has been assessed based on various factors including density considerations, site constraints, planning history, the sustainability and accessibility of a location and the area's wider character. The Council's GIS mapping system was utilised to estimate the potential yield of a site.

4.20 We note that in some instances, there are allocated sites for residential development which already include existing housing and it is not clear from the allocation descriptions how many residential units currently occupy these sites and if their re-provision is factored into the figures (See allocation references SN1/012, SC1/021, AT3/016 as examples). Clearly the figures need to represent net additional homes and therefore the capacity exercise needs to be robust and existing quantum should be made clear.

4.21 We consider that if the residential capacity of many of the identified sites are to yield the estimated number of homes that are included in the housing trajectory, many of the resulting densities would significantly exceed the density guidance range of 40 to 75 dwellings per hectare (dph) that adopted Policy HO5 currently identifies. We note that these guidelines are not proposed to be included in the new version of the Local Plan, which is supported in principle. However, it should be recognised that if new development is to be delivered at densities which exceed the previous maximum Terence O'Rourke Ltd 2022 17 guideline, this will represent a step change in the Borough's approach. Whilst we have no objection to optimising densities in appropriate locations, we question whether all of the projected site capacities, particularly on the smaller sites in more suburban locations, are realistic.

4.22 Furthermore, we consider that the delivery trajectories on major sites with planning

permission in the SLAA are overly optimistic. The reliance on unallocated sites and windfall development which equates to 27% of the housing land supply undermines the spatial strategy.

4.23 Upon reviewing the housing trajectory, it is apparent that there is a particular reliance on sites in current active community use, coming forward in the 1–5-year timeframe and 6–10-year timeframe. Examples include the Sunbury Fire Station, the Staines Fire Station, The Fairways Day Centre, The Ashford Sports Club and The Ashford Community Centre. The deliverability of these sites is uncertain as the land is not readily available for development. There is no timescale or strategy for how these uses will be re-provided elsewhere in the borough, and it is therefore unjustified to rely on their delivery. It is considered that the prospect of housing being delivered on sites in active community use within 10 years is unrealistic and the plan therefore fails the requirement of NPPF para 68.

4.24 The failure to meet the requirements around deliverability, in line with the definition set out in the glossary to the NPPF, would render the Local Plan undeliverable and ineffective, thereby failing to satisfy the tests of soundness.

4.25 With regards to Green Belt release, we agree that exceptional circumstances exist to release land from the Green Belt, but fundamentally SBC must positively consider PDL and sustainable locations well served by public transport first. SBC has failed in this respect given the obvious choice of the Kempton Park PDL site which immediately adjoins Sunbury Cross. This is a settlement which is both a District Centre and is identified as an opportunity area for growth. The plan is clearly unsound in this respect.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

Comber, Emily [Terence O'Rourke] on behalf of Redrow Homes\_Redacted.pdf

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Greg Smith (42425089)</b>
<b>Organisation: Redrow Homes (Kempton Park)</b>

<b>Response ID: 1122681</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
<p>KEMPTON PARK PDL</p> <p>6.1 We have undertaken an objective assessment of Kempton Park PDL based on the approach taken in the SA criteria. We consider that the site should not have been scored so negatively and that the officer's inconsistent approach to scoring has led to many objectives being scored unfairly, most notably Objective 2, 8 and 9. Our full comparison of performance for each objective is included in Appendix 3 however, a summary is below:</p> <p>6.2 The negative scoring of Kempton Park PDL for Objective 2 seems unsubstantiated and inconsistent with the scoring of other less sustainable sites. Development at Kempton Park PDL would focus significant new growth at a location close to an abundance of local services. The officer has failed to acknowledge the proximity to</p>

Sunbury Cross and transport services which would undoubtedly facilitate healthy lifestyles. The site is evidently preferable to other less sustainable parts of the Borough and therefore, the score should be amended from – to +.

6.3 It is considered that the assessment and negative score for Objective 8 is illogical as the officer has assessed the site in the context of the wider Green Belt designation and not the hardstanding area where development is proposed. As discussed in Section 5, this PDL site should not be assessed as being strongly performing when considered in isolation. Development of the PDL can optimise the density of housing in a way which does not harm the integrity of the Green Belt.

6.4 The character of the land west of the site is entirely residential and so the development of housing in this location would not significantly alter the character of the area. Further, the site as it stands provides little in the way of visual amenity and the development would likely enhance the outlook from neighbouring properties through the establishment of a well-designed scheme with ample green spaces and vegetation. On balance, it is considered that the score should be increased from – to 0.

6.5 The assessment undertaken for Objective 9 appears to have no recognition of the sustainable transport benefits associated with development at Kempton Park PDL.

6.6 The site benefits from immediate access to Kempton Park Station and other public transport services which would contribute positively towards promoting sustainable modes of travel, improving accessibility to public transport and reducing road congestion. The scores should be increased from – to +.

#### 7. KEMPTON PARK UPDATE

7.1 The concept plans for the PDL site at Kempton Park have been progressed to reflect the following:

- Flood risk – Redrow has undertaken extensive flood modelling and assessments, which shows a significantly reduced area of the site within the flood zone compared to that currently shown on the Environment Agency's flood maps for planning. In order to maximise the development potential close to Kempton Park station, an area of flooding close to the station will

be re-profiled as part of a flood compensation mitigation strategy, making this area suitable for development. This approach has been agreed in principle with the Environment Agency.

- Utilities – Respond to easements associated with a BPA fuel pipeline and water main that runs through the site.
- Density – Higher density development will be located closer to the station with lower densities towards the south of the site.
- Mix – Provision of various housing typologies with a mix of 1, 2, 3 and 4 bedroom properties to meet a range of housing needs.
- Green Belt boundary – Secures a robust defensible Green Belt boundary whilst providing a suitable interface with the area to be retained within the Green Belt (racecourse).

7.2 The proposal can secure a number of benefits for the local community, including through the provision of potential mitigation measures, which align with established local priorities:

- New homes for local people;
- Policy compliant quantum of new affordable homes, including for key workers;
- Local transport improvements, including;
  - o Interchange improvements at Kempton Park Station (capable of supporting Crossrail 2);
  - o Potential upgrades for extending the London Travel Zone to include Kempton Park Station;
  - o Upgrades to local bus stops; and
  - o Local improvements to cycling and pedestrian environments
- Community infrastructure;
  - o Opportunities for new workspace and other community spaces/facilities or health centre (subject to demand);

Conclusion

6.1 If developed the PDL site would not impact on the generalised key characteristics

of landscape character type UW – “Significant greenspace within urban areas”, and them providing a visual and physical break of rural or natural open character within the built-up areas. This is because the remaining open areas of the racecourse along with the neighbouring Green Belt areas within the London Borough of Hounslow will still provide this visual and physical break within the built-up areas.

6.2 The PDL site sits behind or adjacent to existing grandstands and associated racecourse buildings, from ticket offices, bars to horse stables. Already being developed, we do not consider that it presently forms part of visual and physical break within the built-up areas.

6.3 In terms of the impact on the key characteristics of character area UW3 – Kempton Park, these state that while the racecourse provides visual relief from surrounding built-up areas this is private land, not readily accessible physically to residents surrounding the racecourse with the only views across the site being afforded from a short stretch of the A308 Staines Road East to the south of the racecourse.

6.4 The proposals will not significantly alter any of the key characteristics of character area UW3.

6.5 In terms of officer comments made on landscape character we do not agree that PDL site can be termed ‘somewhat urban’ or that it has “strong associations with the wider racecourse that gives it a sense of rurality”.

6.6 It consists predominantly of hard surfaced car parking surrounded by lighting columns, signage, tall grandstands, stables blocks, boundary walls and fencing and numerous other buildings associated with the racecourse in an area adjacent to the urban edge of Sunbury. The Shepperton Branch railway line is located to the north and the busy Park Road and A308 Staines Road East to the west and south. The PDL site can therefore only be described as urban in character.

Equally, given that the vast majority of the PDL site is screened off from views of the racecourse we do not feel the racecourse can be termed as a rural landscape and therefore cannot provide a sense of rurality.



6.7 We also disagree that the southern racecourse hedgerow adjacent to the A308 Staines Road East “contributes to the rural feel of this part of the road”. This is a very busy road with residential housing to the south of the road. At best it could be described as rural fringe but is in no way rural.

6.8 In terms of visual amenity, the visual splay generated by the proposals is considerably small, as indicated on figure 2. There will be very limited small areas of visibility from the north, mainly from the elevated lengths of the A316 and from where the receptor focus should be on the road rather than the landscape. There are no views from the east and only glimpsed views from the south when passing the gated southern entrance of the racecourse, along a very small stretch of the A308 Staines Road East.

The only significant visual effects are predicted to be from residents along Park Road and the A308 Staines Road East immediately adjacent to the site and from small sections of residential roads behind these when views are orientated towards the PDL site.

6.9 Officer comments throughout the DAAS, June 22 regarding Green Belt have been made using the Arup Stage 2 Green Belt assessment for sub-area 28-a. This assessment looks at removing the entire racecourse site, from the A308 Staines Road East in the west to Portlane Brook in the east. However, the proposals do not seek to remove sub-area 28-a from the Green Belt, only the PDL site.

6.10 In using the Arup methodology from the Spelthorne Green Belt Assessment Stage 2, December 2018, we have assessed that rather than contributing strongly to the purposes of Green Belt and making an important contribution to the wider strategic Green Belt the PDL site contributes weakly.

6.11 In terms of strategic contribution, it was assessed as making a less important contribution.

6.12 In regard to having Green Belt boundaries the proposed line of built form along with the existing grandstand were considered adequate in creating a permanent defensible Green Belt boundary in line with the current NPPF, July 2021, paragraph 143.

6.13 In terms of openness, the officer comments consider that due to the proposals, the actual and perceived sense of openness would be drastically reduced. We strongly disagree with this statement. As stated by the officer, views of the site are very limited. Nevertheless, Spelthorne Council has always stated that while local residents may not be able to physically see the site the openness of the racecourse and the physical gap between built-up areas and its perceived existence still exists.

6.14 However, locals are aware that the vast car parking and hardstanding areas along the western edge of the racecourse, predominantly behind the existing built form do not form part of this open gap that separates Sunbury-on-Thames from Hampton as it is already developed. Therefore, if people can only perceive the openness of this area beyond the existing grandstands, although they can largely not actually see it, then the proposed development will not alter this perception.

6.15 Comments also describe the PDL site as being mostly hardstanding but largely open and free of development and mass. While this may be the case it is still developed land and not the open racecourse. As such whilst there will be a degree of material impact on its openness, we do not consider this will constitute substantial harm to the openness.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

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Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Greg Smith (42425089)</b>
<b>Organisation: Redrow Homes (Kempton Park)</b>

<b>Response ID: 1122674</b>
<b>Policy / Evidence Base / Part of Plan: Policy PS1: Responding to the climate emergency</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
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<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Redrow fully support the policy which responds to the climate emergency but highlights that the omission of the Kempton Park PDL site indicates that Spelthorne Council has not met its own policy requirement that: All development must respond to the climate emergency by: (a) Directing development towards locations that minimise the need to travel and maximise the ability to make trips by sustainable modes of transport including cycling, walking and public transport. (b) Delivering an efficient use of land especially on the most accessible sites. © Providing more walkable and cyclable neighbourhoods (Twenty Minute Neighbourhoods) that reduce demand for the use of private vehicles.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>

Comber, Emily [Terence O'Rourke] on behalf of Redrow Homes\_Redacted.pdf

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Greg Smith (42425089)</b>
<b>Organisation: Redrow Homes (Kempton Park)</b>

<b>Response ID: 1124645</b>
<b>Policy / Evidence Base / Part of Plan: Policy PS1: Responding to the climate emergency</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
<p>Whilst we clearly support the Green Belt policy itself, which is consistent with the NPPF, we do not support the Green Belt boundaries as defined on the proposals map with respect to the Kempton Park PDL site.</p> <p>5.2 In discounting Kempton Park PDL as an alternative allocation (June 2022), officer’s consistently state that the site:</p> <ol style="list-style-type: none"> <li>1) Is not a distinct parcel;</li> <li>2) is strongly performing in relation to Green Belt;</li> <li>3) is open land, despite being used as a car park, but that the relocation of parking would lead to the loss of open land; and</li> <li>4) in any event would rely on the relocation of parking on other Green Belt land.</li> </ol> <p>5.3 These matters are rebutted in detail within the separate landscape representations</p>

prepared by Terence O'Rourke (See Appendix 6), but can be summarised as follows:

1. Spelthorne Council have never considered splitting Kempton Park into two sites in terms of the Green Belt Assessment, but have now reappraised the PDL site. SBC have not considered the definition of a strong urban edge created by the retained racecourse and associated buildings.

2. Spelthorne Council have not undertaken an assessment of the PDL site's performance in isolation. When considering the five purposes for including land within the Green Belt, in our view it cannot possibly be the case that the land is performing strongly against the criteria.

a. It would not result in unrestricted urban sprawl as its contained by the built form of the racecourse buildings that would be retained.

b. The site would not lead to any coalescence with any neighbouring settlements.

c. There would be no encroachment into the countryside given that it's currently tarmacked and includes a number of buildings associated with the racecourse.

d. The site would not negatively impact upon the setting and special character of a historic town.

e. The site would greatly assist in urban regeneration by promoting the recycling of brownfield urban land.

3. It is inconsistent to say the site is 'open car parking land', but that 'parking would lead to the loss of open land'. In our view, it cannot be both. The level of openness associated with this PDL site is currently highly limited and it is viewed in the context of the large Grandstand and other racecourse buildings that sit in the background (or foreground) depending on your viewpoint. We accept that there would be a material change to the visual character of this land with the introduction of new development, however, it would not result in a substantial harm to the openness of the Green Belt. The new development when viewed from the Green Belt would sit

Terence O'Rourke Ltd 2022 19

within the urban context of Sunbury-upon-Thames, set back behind the main

Grandstand building of the racecourse which frames the hard edge to the settlement.

4. Spelthorne Council have made inaccurate assumptions about the need to relocate car parking onto adjoining greenfield land and have never explored with us or our client the extent of parking that may be required for the racecourse. Adequate car parking provision can be consolidated within the Kempton PDL site to serve the racecourse function and still allow for new residential development to come forward (See relevant plans attached at Appendix 3).

5.4 Given the importance of this officer assessment in discounting the Kempton Park PDL site and to expand upon the summary provided above, we respond in a greater level of detail within an accompanying SA Review (see Appendix 4).

5.5 Despite the emphasis at NPPF Para 73 on the important role that larger scale development such as Kempton Park can play in meeting identified needs in a sustainable way, Spelthorne Council is not proposing any strategic greenfield development. Instead, Spelthorne Council is proposing to provide just 829 new homes through the removal of 15 sites in the Green Belt dispersed across the Borough.

5.6 This approach is fundamentally less sustainable than a strategic residential development at Kempton Park PDL. It should be noted that all of these Green Belt sites are either entirely greenfield or substantially greenfield sites. Development on this site at Kempton Park would be on land which is previously developed in its entirety.

5.7 We would also highlight that the NPPF at para 143 states that when defining new Green Belt boundaries, plans should not include land which it is unnecessary to be kept permanently open. We would argue that given the urban nature and use of the current PDL site which is associated with the racecourse operations, the plan would fail to meet this test.

5.8 The NPPF goes onto state that where necessary, plans should safeguard land between the urban area and the Green Belt in order to meet longer term development needs that stretch well beyond the plan period, which is essentially geared towards the desire to avoid needing to alter Green Belt boundaries again at the end of the plan period. We are not suggesting that the site should be safeguarded, as in our view, Spelthorne Council have not robustly considered the Kempton Park PDL site for a residential allocation as part of its current Green Belt review. But nevertheless, given the chronic under-delivery and the decision to release land from the Green Belt, it would be appropriate to safeguard the wider site at Kempton Park in accordance with the NPPF guidance.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

Comber, Emily [Terence O'Rourke] on behalf of Redrow Homes\_Redacted.pdf



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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Greg Smith (42425089)</b>
<b>Organisation: Redrow Homes (Kempton Park)</b>

<b>Response ID: 1122677</b>
<b>Policy / Evidence Base / Part of Plan: Policy SP2: Ashford, Shepperton and Sunbury Cross</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Redrow fully supports the policy and would highlight the approach to maximise the efficient use of land particularly around public transport interchanges and raising densities, whilst having regard to the existing character. 4.27 It goes on to state in paragraph 5.12 that providing housing around transport interchanges, such as rail stations, accords with the NPPF in making efficient use of land. 4.28 This approach is supported by the SA indicators for these areas, which generally perform positively in the short, medium and long term, with only one negative score which is in relation to potential flooding over the longer-term. These areas appear to out-perform Staines from an SA point of view in respect of the potential of flood risk. 4.29 However, the positive benefits in this respect are not acknowledged when considering the Kempton Park PDL option, where the site has been scored poorly in nearly all respects, other than the positive housing and economic benefits the development could bring.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>

No Response

**Question 6:** You can upload any modifications below.

Comber, Emily [Terence O'Rourke] on behalf of Redrow Homes\_Redacted.pdf

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: John-David Smith (41500193)</b>
<b>Organisation:</b>

<b>Response ID: 1124083</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
LGS/Sunbury Common/Running Horse Green Belt Ref:plan for housing on Running Horse green belt. We have lived here on Vicarage for 45 years and we would if this happened. There is no way that I could accept any building of homes on this land . The impact of more homes, traffic and the need for services will be detrimental to the residents already struggling with these issues. It will be impossible to deal with the increase in pollution ,air quality,noise,dirt and fumes, not to mention the fact that Vicarage Road is frequently at a standstill with the present volume of traffic and therefore cannot possibly cope with any increase. This does not even consider the extent of disruption to everybody's lives with added noise etc from heavy lorries and other machinery for years to come.

NO! NO! NO! This is not a suitable site for more housing.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Nigel Smith (41658049)</b>
<b>Organisation:</b>

<b>Response ID: 1124234</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I wish state my objection to the building of houses behind the Running Horse Public House. Firstly because it is on Green Belt land and secondly the infer structure for the area would not be able to cope with an extra 180 houses. The schools and health centre can barely cope now.
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
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Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Stuart Smith (41294913)</b>
<b>Organisation:</b>

<b>Response ID: 1111843</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Local Green Space-Sunbury Common- Catherine Drive The green opposite our house is used daily by the residents children to play safely as there is very little traffic in the road as it favours a cul-de-sac style. Our children grew up using this safe place to play and ride their bikes, as the horse shoe shape green gives a clear view of the entire green and any oncoming vehicles. The Catherine Drive residents use the green to gather and chat throughout the year, and it was a life saver during lockdown for the mental health and well-being of many, as we could all stay in contact and chat at a social distance. The open space and trees provide a serene and appealing vista, which would be ruined if this was developed. This would in turn lower the value of our property which we have invested a lot into over the 20 years we have lived here.



In addition, It is also used by local dog walkers, not only Catherine Drive residents, that exercise their dogs on the green and chat with various residents. Our green provides a genuine community space that is loved and cared for by all the residents and local community. It would be devastating for all of us if it was developed, and so should be protected.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Susan Mary Smith (41499745)</b>
<b>Organisation:</b>

<b>Response ID: 1124080</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
LGS/Sunbury Common/Running Horse Green Belt Ref:plan for housing on Running Horse green belt. There is no way that I could accept any building of homes on this land . The impact of more homes, traffic and the need for services will be detrimental to the residents already struggling with these issues. It will be impossible to deal with the increase in pollution ,air quality,noise,dirt and fumes, not to mention the fact that Vicarage Road is frequently at a standstill with the present volume of traffic and therefore cannot possibly cope with any increase. This does not even consider the extent of disruption to everybody's lives with added noise etc from heavy lorries and other machinery for years to come. NO! NO! NO! This is not a suitable site for more housing.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ken Snaith (19551713)</b>
<b>Organisation:</b>

<b>Response ID: 1110198</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST1: Presumption in Favour of Sustainable Development	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: Paragraph 2 implies the removal of the rights of local affected residents to object to planning applications.
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Removes the rights of residents to make representations against planning applications.	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Revise wording of Para2 to include “subject to consideration of any representations from local residents being fully considered”.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ken Snaith (19551713)</b>
<b>Organisation:</b>

<b>Response ID: 1110202</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: Need to ensure the same minimum living spaces are applied to office to residential conversions: currently they do not.
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
See note in Section 5 below	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Wording should include the need for office to residential conversions to conform to the equivalent minimal living area standards as all other developments.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ken Snaith (19551713)</b>
<b>Organisation:</b>

<b>Response ID: 1110206</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS2: Designing places and spaces	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: It's a great pity that Paragraph 7 was not applied when considering the approval of the Shepperton Studios site on green belt.
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not effective	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
See comments above.	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No other comments	
<b>Question 6:</b> You can upload any modifications below.	
No, I do not wish to participate in hearing session(s)	

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No Response



If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ken Snaith (19551713)</b>
<b>Organisation:</b>

<b>Response ID: 1110209</b>	
<b>Policy / Evidence Base / Part of Plan: Policy SP1: Staines-upon-Thames</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: Paragraph 5 does not really address how new community infrastructure will actually be obtained.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No	Additional Comments: See comments above.
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not effective	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
There is a need through the plan to indicate how real additional infrastructure can be obtained as part of, particularly large, developments.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No specific comments.	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ken Snaith (19551713)</b>
<b>Organisation:</b>

<b>Response ID: 1110406</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy SP6: River Thames and its Tributaries
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
See item 5 below.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Reference should be made to the council's intentions to object to any proposal for mass movement from their existing locations on the Northern side of Heathrow to the Southern side, immediately overlooking Stanwell.
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ken Snaith (19551713)</b>
<b>Organisation:</b>

<b>Response ID: 1110416</b>	
<b>Policy / Evidence Base / Part of Plan: Policy H1: Homes for All</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: Paragraph 6.14 covering housing mix and size requirements does not mention these minimum requirements being applied to e.g. office to residential conversions and should be added to the Housing document.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No comment	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No Response	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
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Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ken Snaith (19551713)</b>
<b>Organisation:</b>

<b>Response ID: 1110418</b>	
<b>Policy / Evidence Base / Part of Plan: Policy H2: Affordable Housing</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: Paragraphs 2 (a), (b) & (c) does not appear to address the the old problem of developers preferring to financially support “affordable housing” elsewhere to avoid it being part of their application. But if this is continued where is the “somewhere else” to
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
See comments above.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No Response	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
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Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ken Snaith (19551713)</b>
<b>Organisation:</b>

<b>Response ID: 1110536</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No comment.
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
For clarity should the wording in para 3(b) include after off-site financial contribution "from the developer" ...
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

Representations Made Under Regulation 20  
in Representor Order

1874

<b>Respondent: Mr Ken Snaith (19551713)</b>
<b>Organisation:</b>

<b>Response ID: 1110540</b>
<b>Policy / Evidence Base / Part of Plan: Policy EC1: Meeting Employment Needs</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not consistent with national policy
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
When the Shepperton Studios expansion into the green belt was approved on “economic grounds” it was stated that the land would remain designated as green belt. The wording of para 4 implies that is not now the case and, however unlikely, can never be returned to the green belt.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
See section 4
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ken Snaith (19551713)</b>
<b>Organisation:</b>

<b>Response ID: 1110543</b>	
<b>Policy / Evidence Base / Part of Plan: Policy EC3: Local Centres, Shopping Parades and Isolated Retail Units</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: Reference para 7: The minmum residential space requirements should apply to additional or conversions of units over commercial/shop premises as if they are new builds. This is not clear in the existing wording.
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
See above	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No Response	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
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Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ken Snaith (19551713)</b>
<b>Organisation:</b>

<b>Response ID: 1110550</b>	
<b>Policy / Evidence Base / Part of Plan: Policy ID1: Infrastructure and Delivery</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: Para 4 of ID1 states: "Developers must demonstrate they have explored existing infrastructure capacity, and how this could be future-proofed, with appropriate providers and demonstrate that they have made sufficient provision. Where appropriate, and where
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not effective	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No comment.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No Response	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
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Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ken Snaith (19551713)</b>
<b>Organisation:</b>

<b>Response ID: 1110554</b>
<b>Policy / Evidence Base / Part of Plan: HS1/012 (Land East of Upper Halliford, Nursery Road)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Fully support plans for additional schooling and housing. Editorial note: the site location description in the text should read "East" (not West) of Upper Halliford Rd i.e. same as the heading.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
No Response
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Miss Claire Somerville (23648929)</b>
<b>Organisation:</b>

<b>Response ID: 1111835</b>
<b>Policy / Evidence Base / Part of Plan: Policy ID1: Infrastructure and Delivery</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
I've previously filled in my opinions on the Local plan but have looked in more detail at it in the summer Bulletin magazine. I feel i have more to add now. After 17 years working at LHR as cabin crew covid forced me to leave due to the contract changes the company forced on its staff. I've had 6 jobs since leaving. As a home carer, a GP Receptionist, SEN 1:1 at a primary school, a therapy assistant in a hospital and currently in a school as admin & Welfare assistant. I can honestly tell you that the local area is at breaking point in terms of health and education. How can you expect it to support more people needing GPs, school places etc with the current provisions?

I see you mention improvements to key infrastructure but what exactly? More GPs? More social care? You say you'll provide a new health and wellbeing centre in Staines but what about surrounding areas? They all need more provisions too.

I can see that you plan to put in a 6<sup>th</sup> form college in Sunbury, have you seen the school traffic? There are 6 schools in a small area adding to that will cause gridlock!

Schools are struggling with SEN children, if you want to put a new school in the area, a specialist school is desperately needed. The amount of children being taken in expensive cabs is shameful. Adding to the environmental impact too.

The climate emergency is happening right now, by forcing people to travel for schools, GPs etc adds to it. Traffic is bad as it is, yiu talk of improving links but I still can't believe there isn't a decent bus service from Ashford, sunbury or shepperton to LHR. A once in a blue moon 555 doesn't cut it.

Also, why can't the stations between Feltham and Staines be included in the TFL, other stations much furthur away are included.

The only thing I think is a positive ofvthe local plan is the idea to try connect the rivers more and the improvement of river crossings.

I am happy to discuss any if this furthur.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Nick Spencer (40270561)</b>
<b>Organisation:</b>

<b>Response ID: 1112324</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E4: Environmental Protection
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Air quality should be a major consideration for any council particularly one so close to a major airport Why are bonfires still permitted? I live approximately one mile away from the new ulez (great for people who like to breathe)and some of my neighbours have bonfires it makes no sense Unfortunately it will require a ban to stop people Please help those with breathing problems to breathe more easily
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
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Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Janet Sperling (41960737)</b>	
Organisation:	
<b>Response ID: 1117303</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>I live at Courtfield Road (TW15 1JR) near my property is a green. This green is central to the estate I live on which has Landon Way &amp; Stroud Way surrounding it.</p> <p>My husband &amp; I moved here in 1979 &amp; raised our 3 children. Our children used the green for recreational purposes &amp; various teas to celebrate many national &amp; royal occasions.</p> <p>This green is central to our happy existence in Courtfield Road &amp; I hope nothing will stop this as we will object strongly to any likelihood of any building plans,</p>	
<b>Question 6:</b> You can upload any modifications below.	
No Response	



**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Margaret Stanford (25497025)</b>	
<b>Organisation:</b>	
<b>Response ID: 1125969</b>	
<b>Policy / Evidence Base / Part of Plan: HS2/004 (Land south of Nursery Road)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
As a local resident in Peregrine Road, Sunbury-on-Thames, I feel a huge NEED to comment on the plans to build homes on Nursery Road, opposite Upper Haliford Station. Destruction of green space is unacceptable!!!! We all know that to save this planet, we have to grow our green spaces , NOT destroy it!!!! This is so short sighted!!! The traffic in the area, largely due to the 6 schools in a very close area -Springfield, Bishop Wand, Sunbury Manor, St Ignatius, St Pauls and Hawkdale, and already dense housing, is unacceptable. The pollution is already recorded as the worst in Surrey	

M3 motorway

Railway

Local Traffic

Proximity to Heathrow

'Eco Park' in Charlton immediately down wind

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Judy Starbrook (42118529)</b>
<b>Organisation:</b>

<b>Response ID: 1119571</b>
<b>Policy / Evidence Base / Part of Plan: ST4/025 (Coppermill Road)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Living in nomansland of RBWM for the past 50+years, I understand that Coppermill Road comes under RBWM. Strange that Spelthorne have it listed.. Have the powers that be moved the County Boundary? My address is 5 Wraysbury Road, TW18 4TX. Just under the motorway bridge . Often get Travelling people knock and ask who owns the field behind, between Wraysbury Road, Gloucester Drive and the By-Pass. Think over the years it passes to others in card games! Would love to know who is responsible for the so called PUBLIC FOOTPATH which runs parallel with the By-Pass at the back of these properties as it crosses the County Boundaries - RBWM don't seem to know perhaps Spelthorne do! Ashby Recreation Ground (the Lammas) was left for the residents of Spelthorne, but they have to pay to park there. Flood ditch runs round the perimeter of the park, which was the County Ditch – county boundary

Lammas Drive, Gloucester Drive are the County Boundary.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Sheila Stocking (25678433)</b>
<b>Organisation:</b>

<b>Response ID: 1113573</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I wish Heatherlands to be protected as LGS as with with others in Sunbury Common area. Heatherlands Green is compact, too small for development and has over many years suffered with drainage problems. Parking is an issue too. Many people from Vicarage Road are forced to park here due to lack of space along their road. We have two healthy trees growing on the Green which help to contribute towards clean air and gives a pleasant outlook. Sunbury Common suffers from very high pollution due to traffic and sometimes aircraft making it an unpleasant and unhealthy place to live so please don't make things worse. We need more trees not buildings.
<b>Question 6:</b> You can upload any modifications below.
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Shepperton Studios (43052353)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128025</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Plan as a whole	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
The Local Plan is not: Not Positively Prepared, Not Justified, Not Effective, Not Consistent with National Policy See attached document (130 pages) please provide summary.	
<b>Question 6:</b> You can upload any modifications below.	
Shepperton Studios Representations - Pre-submission Spelthorne Local Plan_Redacted.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618792/PDF/-/Shepperton%20Studios%20Representations%20%2D%20Pre%2Dsubmission%20Spelthorne%20Local%20Plan%5FRedacted%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618792/PDF/-/Shepperton%20Studios%20Representations%20%2D%20Pre%2Dsubmission%20Spelthorne%20Local%20Plan%5FRedacted%2Epdf</a>	



**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: yes

<b>Respondent: Dr Colin Summerhayes (42026113)</b>	
<b>Organisation:</b>	
<b>Response ID: 1124621</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>Spelthorne Borough Council dire plan to release substantial areas of Green Belt for development.</p> <p>I am writing to complain about your plans to release substantial areas of Green Belt for development. You fail to understand that we are in a global climate emergency, which helps to explain why we have had such hot temperatures for the summers of the past decade, and why they are getting even warmer as time goes by. The fact that this is global should be obvious from other signals from around the world - China is in its worst drought for hundreds of years, with 66 of its rivers drying up; other areas (e.g. in the USA) are experiencing dire forest fires; yet others are experiencing extreme heat (e.g. India) or extreme floods (33 million people displaced in Pakistan for instance). These incidences are not accidental, they are the result of global overheating (e.g. for every one degree Celsius of rise, the air holds 7% more moisture, so wet areas get wetter; dry areas, on the other hand, get drier). In November 2021 this country hosted in Glasgow the 26<sup>th</sup> meeting of the UN Framework Convention on Climate Change, at which the world's governments</p>	

again agreed that the situation was getting worse and we must all do something about it. Building on the green belt is NOT the way to contribute to solving the problem, because plants eat carbon, which they extract from the air. We need MORE green belt, NOT LESS. Buildings, with their attendant roads and concrete surfaces instead absorb heat, warming their surroundings - not what we need at all. What you should be doing is investing in retrofitting the existing housing stock so that it emits less heat. And if you need more housing you should build it on brownfield sites, and you should build up, not out.

There is a further argument for preserving the little green belt that we have. It is that losing green belt means losing biodiversity and encouraging the extinction of plant, animal, bird and insect species. The government's recent Dasgupta report makes it plain that we must reverse biodiversity decline, not contribute to making it worse. Everyone should have (and read) a copy.

What you are doing is going completely against the grain of present government plans, which include adding a very substantial acreage of forest to the country, so as to contribute more to the extraction of CO2 from the air.

Please pay attention to the direction of government travel as far as global overheating and biodiversity loss are concerned. Your plan is out of step. It is a dinosaur representing the thinking of times past. It should be put to sleep. I speak as a climate scientist (from Cambridge University's Scott Polar Research Institute) and as a Surrey resident.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ian Swinglehurst (25691265)</b>	
<b>Organisation:</b>	
<b>Response ID: 1119504</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Evidence Base - SFRA	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
To quote Chapter 9 of the Local Plan (Sections 9.1 and 9.2):	
<b>Question 6:</b> You can upload any modifications below.	
SBC_Level_1_SFRA_2022-05-051 - extract p.20-22.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589327/PDF/-/SBC%5FLevel%5F1%5FSFRA%5F2022%2D05%2D051%20%2D%20extract%20p%2E20%2D22%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/589327/PDF/-/SBC%5FLevel%5F1%5FSFRA%5F2022%2D05%2D051%20%2D%20extract%20p%2E20%2D22%2Epdf</a>	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ian Swinglehurst (25691265)</b>
<b>Organisation:</b>

<b>Response ID: 1119505</b>
<b>Policy / Evidence Base / Part of Plan: Policy E3: Managing Flood Risk</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
As a general comment I think it is utterly crazy to attempt to concentrate over 50% of Spelthorne's housing quota into one relatively small geographic area, i.e; Staines. The Plan is fatally flawed because Staines is Staines-upon-Thames. The plan has overlooked that we have a still untamed river flowing right through the middle. If you want to destroy an established town this is precisely the way to do it at the expense of all of the existing inhabitants of Staines. This is a punitive and even catastrophic proposal because one fundamental problem has been entirely overlooked.

The River Thames flows within the Thames Valley. The Thames flow is approximately 6 miles wide. There is a visible channel in the centre of the Valley and ground water flows within the gravel substrate either side. Due to the nature of the valley, the ground water flows become greater, the closer you get to the navigable Thames Channel at it's centre.

The majority of Victorian buildings within the existing 'low-rise' built environment adjacent to the Thames, do not significantly impede the flow of water below ground; taking my own 110 year old house as an example which is within 100m of the Thames; the Victorian 'spreader' foundation extends only a matter of 600mm below soil level. The gravel layer starts at around 1,000mm. Thus no part of the foundation impedes water flowing through the gravel substrate layers. This was amply illustrated in 2014.

Staines as you well know is already extremely vulnerable and as a consequence of 22 years of EA, DEFRA and Government ineptitude, it no longer has any planned relief channel.

I would like to point out that even decisions taken by a somewhat inept and partial Planning Inspectorate will now lead to more serious flooding issues, particularly Egham Hythe which includes Pooley Green, which rests within Runnymede.

This appears to me to an act of crass stupidity on the part of the Planning Inspectorate whom clearly have no comprehension or insight into the very serious nature of the hydrology within a Town, which now appears to be deemed to be 'flood-able' by the Environment Agency. Why compound an already desperate situation and make it potentially 100 times worse?

All of the high-rise buildings proposed within the Local Plan will require deep foundations. These foundations have a damming effect on ground water flows as well as the future viability of the thousands of existing homes.

Since 2014, there has been a reluctance on the part of Government, the EA, DEFRA, EFRA Committee and the Local Conservative MPs (historically Chancellors on both sides of the River) to take seriously the matter; that it only took 550 CUMEX to produce the same flood patterns as in 1947 which was measured at 750 CUMEX.

Very clearly there is not enough 'room for the river' anymore. Adding deep foundation dams within 3 miles of the adjacent banks of the Thames, merely serves to exacerbate the existing problem, which is not yet being controlled in any way. In Staines we are 45' above sea level. The Dutch recognised this same problem and implemented the 'Room for Rivers Programme' to remove infrastructure obstacles to safeguard against flooding.

To illustrate this point further, I worked on an infrastructure project at Schiphol airport, which is 3m below sea level. The Dutch were stunned to learn of the 2014 floods at 14.7m above sea level and never experienced the same levels of flooding, despite the comparable rainfall.

If we are to continue on this ludicrous path of installing deep foundations to support high-rise developments within three miles of the River Thames in Staines in particular, then it should be on the understanding that developers indemnify all existing households and building owners against the increased risk of flooding. That as a planning condition, they agree to take down buildings and remove the foundations closest to the Thames and work backwards until the risk is mitigated back to present day levels. This commitment will need to be imdenfied in perpetuity, given that developers liquidate from time to time.

This is a very simple concept to understand. If you put your foot in the gutter on a rainy day, the water builds in front of your foot and rises, until it flows around your foot. If you place a deep foundation in front of subterranean flow, the water will build and appear above ground and flow around the foundation. There are many deep foundations in this local scheme.

I can find no reference to the total volume of ground water displacement associated with the many planned deep foundations, peak winter ground water flow rates nor any reference to any planned drainage relief channels nor required projected capacity. The plan is naive and ill-conceived, given it's potential to permanently displace 10's of thousands of householders.

In the immortal words of Captain Tom "Stinger" Jordan in Top Gun, Spelthorne Council Planning Officers and the Planning Inspectorate are "writing cheques that their bodies can't cash".

Anyone who chooses to proceed down this route without having properly demonstrated due diligence with respect to flood mitigation is liable to be accused of the criminal act of gross negligence. It is therefore important that all Council Officers, Elected Councillors and prospective Developers proceed with their eyes entirely open. There were a number of deaths linked to the 2014 floods, so in the light of the past if any individual wishes to put their name to the scheme and disaster should repeat itself with less input from nature, no person should be immune from the criminal allegation of GNM, prosecution and the risk of loss of liberty.

This is a scheme which has potential to destroy and even end a lives. You should support this Local Plan at your own personal risk.

Here is a very basic and simple example of the problem:

The Effect of Piles and Caissons on Ground-water Flow

[https://hkss.cedd.gov.hk/hkss/filemanager/common/publications-resources/list-of-technical-papers/202\\_Pope%20&%20Ho%20\(1982\)\\_The%20effect%20of%20piles%20and%20caissons%20on%20groundwater%20flow.pdf](https://hkss.cedd.gov.hk/hkss/filemanager/common/publications-resources/list-of-technical-papers/202_Pope%20&%20Ho%20(1982)_The%20effect%20of%20piles%20and%20caissons%20on%20groundwater%20flow.pdf)

In the case of the Thames, the ground water flow rate is determined by the resistance of the substrate. When capacity is reached the ground water can only go up and travel above ground given the reduced resistance. This means that any impermeable obstacles placed below ground will merely accelerate the point at which the ground water takes the path of least resistance, which is above ground, leading to flooding of streets and homes.

I am of the opinion that Spelthorne Council have been entirely negligent in their failure to put forward a case to Government and the Planning Inspectorate, as to why it is completely inappropriate to attempt to satisfy housing quota within the hydrological footprint of the River Thames. I am also of the opinion that the Planning Inspectorate have been equally negligent in granting an application which now has very serious potential to threaten the lives of all of those whom live within the geographical area of Egham Hythe.

When will Politics, naivety and stupidity give way to joined up thinking?

**Question 6:** You can upload any modifications below.

No Response



**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Tarmac Trading Ltd (43105057)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128514</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Not justified, Not effective, Not consistent with national policy were also selected. A substantial response document has been submitted as a representation, which makes several references to the Green Belt throughout the document and other sites. Please see attached documents and provide summary.	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
No Response	
<b>Question 6:</b> You can upload any modifications below.	
Appendix C 1 out of 3.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/616847/PDF/-/Appendix%20C%201%20out%20of%203%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/616847/PDF/-/Appendix%20C%201%20out%20of%203%2Epdf</a>	
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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Please refer to submitted response document.

<b>Respondent: Tarmac Trading Ltd (43105057)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128516</b>	
<b>Policy / Evidence Base / Part of Plan: AT1/002 (Land East of Ashford Sports Club, Woodthorpe Road)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>Not positively prepared, Not justified, Not effective, Not consistent with national policy - have all been selected.</p> <p>This 1.15ha site is currently Green Belt and was assessed at the Preferred Options consultation in early 2020 as having a capacity of 40 – 63 dwellings at a density of 35 – 55 dwellings per hectare (dph).</p> <p>The surrounding area is urban to suburban and characterised by residential properties in a medium density of approximately 35 – 45 dph. However, the pre-submission allocation proposes ‘approximately’ 108 units on this site which would lead to a density of development of at least 94 dph. This density is considered out of character with the density of surrounding built development and would lead to an incongruous form of development on this edge of settlement location.</p> <p>Furthermore, the draft site-specific requirements include “strengthening of the adjacent Green Belt boundaries to retain its performance and strategic role”. It is not clear how this 1.15ha site could accommodate over 100 dwellings and appropriate strengthening of the Green Belt boundaries.</p> <p>In addition, the site is to be used as a construction compound for the Southampton to London Pipeline Project into 2023. Notwithstanding the unachievable densities, the site is not available or realistically deliverable given its committed use.</p>	

Overall, it is considered proposed allocation AT1/002 could deliver 40 – 63 dwellings as originally proposed, but a development of over 100 dwellings would not be sustainable. This high density allocation in a suburban area also does not contribute to the stated Local Plan strategy of delivering more family homes with gardens, and there are question marks over the deliverability of the site within the first five years of the plan given the site is currently a construction compound.

A substantial response document has been submitted as a representation, please see attached documents.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Please refer to submitted response document.

<b>Respondent: Tarmac Trading Ltd (43105057)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128509</b>	
<b>Policy / Evidence Base / Part of Plan: HS1/012 (Land East of Upper Halliford, Nursery Road)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Not justified, Not effective, Not consistent with national policy were also selected.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
<p>This 1.61ha site is part of a larger 3.93ha site assessed as strongly performing Green Belt. The site was included in the Preferred Options consultation for approximately 56 – 88 dwellings and is now proposed for 60 units. However, the site suffers from potential access constraints. At the Preferred Options Consultation, Surrey County Council responded to allocation HS1/012 stating “there are issues providing suitable access to this site. Proposed vehicular access would be to Upper Halliford Road at a point where the road is dual carriageway. This would likely lead to unsafe U-turning manoeuvres further down the road as the roundabout to the south is inconveniently far away.”</p> <p>There is no guarantee that a safe access can be created from Upper Halliford Road, and in these circumstances an alternative access would have to be sought from Nursery Road to the north. However, the land to the north is also a draft allocation for housing (HS2/004). As such, there is too much uncertainty as to whether the site can be delivered for housing in the first five years of</p>	

the local plan given the clear access constraints.  
please see attached documents.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Please refer to submitted response document.

<b>Respondent: Tarmac Trading Ltd (43105057)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128523</b>	
<b>Policy / Evidence Base / Part of Plan: HS2/004 (Land south of Nursery Road)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Not justified, Not effective, Not consistent with national policy were also selected.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
This 0.67ha Green Belt site is drafted as having a capacity of 41 dwellings. The site is located adjacent to the north of allocation HS1/012. Whilst the site could be accessed directly from Nursery Road, the layout of development may also have to accommodate access to site HS1/012 given the uncertainty of being able to form a safe access onto Upper Halliford Road. In addition, the site has three separate freehold titles which raises questions over whether the site could be delivered in full in the first five years of the plan period, and disruption to the delivery of this site could also have a knock-on effect to site HS1/012, subject to access provision which is still unknown. A substantial response document has been submitted as a representation, please see attached documents.	
<b>Question 6: You can upload any modifications below.</b>	
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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Please refer to submitted response document.

<b>Respondent: Tarmac Trading Ltd (43105057)</b>
<b>Organisation:</b>

<b>Response ID: 1128512</b>
<b>Policy / Evidence Base / Part of Plan: SN1/006 (Land to west of Long Lane and south of Blackburn Trading Estate)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not justified, Not effective, Not consistent with national policy were also selected. This 4.8ha Green Belt site was proposed at the Preferred Options consultation for the development of 14,500 square metres of commercial floorspace. It was considered that the proximity to cargo uses to the north and Heathrow Airport beyond lends the site to an employment use. Even though the pressing need for the strategy is housing, there is likely to be need for airport related cargo facilities and the existing housing is only at the corners of the site, limiting the extent to which this site would lend itself to residential. However, the pre-submission Local Plan allocates the site for 200 dwellings with access from Long Lane to the east. It is considered the land should be used for commercial floorspace, building upon the large scale employment uses adjacent to the north and capitalising on the expansion of Heathrow Airport and the previous officer assessment noted “material released during the first stage of consultation on Heathrow Airport expansion suggests the site could be used for airport related development, likely to be cargo.” Spelthorne Local Plan Pre-Submission Consultation Representations on Behalf of Tarmac 13 September 2022.

Overall, site SN1/006 lends itself to a commercial use, likely capitalising on proximity to Heathrow Airport which is on course to be expanded to include a third runway, rather than a residential development which could be accommodated elsewhere. As a result, it is considered that allocating the site for dwellings is short sighted when a commercial use is clearly more appropriate for the longer term strategic economic interests of Spelthorne Borough.

A substantial response document has been submitted as a representation, please see attached documents.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Please refer to submitted response document.

<b>Respondent: Tarmac Trading Ltd (43105057)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128503</b>	
<b>Policy / Evidence Base / Part of Plan: AE3/006 (158-166 Feltham Road)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>In regards to: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to. - Not justified, Not effective, Not consistent with national policy were also selected. Please refer to submitted response document.</p> <p>Allocation AE3/006 is a 1.3ha brownfield site with a proposed capacity of 75 dwellings. However, the site was previously allocated for development in the 2009 Core Strategy and Policies DPD and was not developed within the 2014-2019 proposed timescale.</p> <p>The site is currently occupied for commercial / industrial use and comprises 17 single storey business units. Previous consultation responses highlight that these medium sized units are occupied by small and medium sized businesses which would need alternative premises. The site was also included in the Preferred Options consultation where the officer conclusions note “an alternative employment site would need to be identified to avoid negative economic impacts”. It is not clear where this is proposed.</p> <p>Overall, allocation AE3/006 is an employment site with a number of occupiers. The site has previously been allocated for residential for development but has not been developed, and the commercial uses have remained. The Council note in their Regulation 19 Officer Site Assessments Document that</p>	

“Consideration therefore needs to be given to why the site was not developed and whether certainty is required from a new allocation.” (p. 5) but at this pre-submission stage, it appears no consideration on this has been made, yet the site is proposed for allocation anyway. It is submitted that the site is a functioning commercial site contributing to the small and medium business economy of Spelthorne and should be retained as such. This raises serious doubts over

the deliverability of the site within the first 6 – 10 years of the Local Plan period.

A substantial response document has been submitted as a representation, please see attached documents.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

A substantial response document has been submitted as a representation, please see attached documents.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: please refer to submitted response document.

<b>Respondent: Tarmac Trading Ltd (43105057)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128519</b>	
<b>Policy / Evidence Base / Part of Plan: AS1/001 (Tesco Extra, Town Lane)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Not justified, Not effective, Not consistent with national policy were also selected.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
<p>This allocation is a 3.98ha site currently occupied by a Tesco superstore, a large car park, and a petrol station. The proposed allocation includes the development of 350 units. However, the sitespecific requirements include the retention of the existing superstore with adequate parking. It is not clear how 350 dwellings could be delivered on this site with the retention of the superstore and appropriate car parking. It is therefore reasonable to conclude that the site is not available.</p> <p>However, assuming dwellings would be erected on or over the existing car park, this could lead to an unacceptably high density of development density of at least 270 dph (given the existing car park is approximately 1.28ha). What is more likely is that a large tower block would occupy part of the existing car park, at an even greater density. This very high density would be unacceptable for</p>	

this part Spelthorne and could lead to highways conflicts between the existing busy superstore Spelthorne Local Plan Pre-Submission Consultation Representations on Behalf of Tarmac 14 September 2022 and petrol station, Ashford Hospital, and other high density residential development to the south.

Overall, it is considered the development of 350 dwellings on this site would be unacceptable overdevelopment and lead to a severe impact on the highway network and local services

Development at West Plaza to the south is at 178 dph (152 units). Whilst a higher density development could be acceptable in this location, it is considered that allocation AS1/001 is unclear and would lead to significant adverse overdevelopment completely out of scale and character with the surrounding area.

With such uncertainty, it would not be appropriate to bring forward allocation AS1/001 and it is highly unlikely that the site would be available to deliver 350 dwellings by 2032.

A substantial response document has been submitted as a representation, please see attached documents.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Please refer to submitted response document.



<b>Respondent: Tarmac Trading Ltd (43105057)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128521</b>	
<b>Policy / Evidence Base / Part of Plan: AS1/003 (Former Staines Fire Station, Town Lane)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Not justified, Not effective, Not consistent with national policy were also selected.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
<p>The pre-submission Local Plan states site AS1/003 is 0.43ha, however, the site is 0.33ha as stated at the preferred options stage. The number of proposed dwellings has also increased from 23 – 30 dwellings at 75-100 dph, to 50 dwellings at 152 dph.</p> <p>At the preferred options stage in early 2020, South East Coast Ambulance NHS Foundation Trust (SECAmb) submitted representations confirming they occupy the site and that the site is still required operationally (and expected to be required for the foreseeable future) by the ambulance service.</p> <p>As a result, SECAmb formally submitted that allocation AS1/003 should not be taken forward residential development in the preferred site allocations document in order to reflect the ongoing requirement of the use of the site as a satellite facility to Chertsey Make Ready Centre.</p> <p>Therefore, it is not clear whether the site is deliverable within the first 6 – 10 years of the Local Plan due to the ongoing need (as of 2020) for use by SECAmb.</p>	

A substantial response document has been submitted as a representation, please attached documents.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Please refer to submitted response document.

<b>Respondent: Tarmac Trading Ltd (43105057)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128510</b>	
<b>Policy / Evidence Base / Part of Plan: HS1/012b (Land East of Upper Halliford Road)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Not justified, Not effective, Not consistent with national policy were also selected.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
This site forms the southern part of HS1/012 and is assessed as strongly performing Green Belt. As a result, this site was not a proposed allocation at the preferred options stage but is now allocated for 20 dwellings and a sixth form college. This change of position is welcomed and demonstrates how releasing Green Belt can help meet the development and community needs of Spelthorne. A substantial response document has been submitted as a representation, please see attached documents.	
<b>Question 6: You can upload any modifications below.</b>	
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<a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/616821/PDF/-/Appendix%20C%201%20out%20of%203%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/616821/PDF/-/Appendix%20C%201%20out%20of%203%2Epdf</a>	

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Please refer to submitted response document.

<b>Respondent: Tarmac Trading Ltd (43105057)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128507</b>	
<b>Policy / Evidence Base / Part of Plan: SC1/006 (Tesco Extra, Escot Road)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>Not justified, Not effective, Not consistent with national policy were also selected.</p> <p>Proposed allocation SC1/006 raises similar concerns to AS1/001. This allocation proposes 225 dwellings on the car park of the existing Tesco superstore, to be delivered in a 7-storey tower block. Whilst a higher density development may be appropriate here, there concerns about whether the scale of proposed development could be accommodated whilst also ensuring the retention of the existing superstore on site with appropriate parking. Furthermore, the site is not ideally located for residential development as it is not centrally located and adjacent to the M3 and an industrial estate, giving rise to potential amenity concerns. Furthermore, a residential development here would not contribute to Spelthorne's stated aspiration of delivering family homes with gardens.</p> <p>Please see attached documents</p>	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Please see attached documents	

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Please refer to submitted response document.

<b>Respondent: Tarmac Trading Ltd (43105057)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128513</b>	
<b>Policy / Evidence Base / Part of Plan: ST4/023 (Two Rivers Retail Park Terrace, Mustard Mill Road, Staines)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>Not justified, Not effective, Not consistent with national policy were also selected.</p> <p>This 2.29ha site is allocated for 750 dwellings with ground floor commercial uses, replacing the existing retail park with large retail units and car park. It is considered a higher density development here could be acceptable; the site is centrally located close to Staines town centre.</p> <p>Whilst it is considered that densities should or could be increased where appropriate, especially where this would accord with the character of the surrounding area, the scale of this allocation is considered to constitute overdevelopment. The site is an edge of centre location where the surrounding development is characterised by two storey residential development to west and east, and generally low rise commercial development to the south.</p> <p>It is submitted that to achieve a retention of ground floor commercial space and 750 dwellings as well as appropriate parking, there would be a significant change in the urban area and would constitute overdevelopment as well as a likely loss of town centre commercial floorspace.</p> <p>A substantial response document has been submitted as a representation, please see attached documents.</p>	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	

No Response

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Please refer to submitted response document.



<b>Respondent: Tarmac Trading Ltd (43105057)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128525</b>	
<b>Policy / Evidence Base / Part of Plan: SN1/005 (Land at Northumberland Close)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
Not justified, Not effective, Not consistent with national policy were also selected.	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
<p>Proposed allocation SN1/005 is just to the north of allocation SN1/006. Similarly, this site was included at the preferred options stage for a commercial development for approximately 2,000 square metres of commercial floorspace, but is now allocated for 80 dwellings. It is considered that site SN1/005 lends itself to a commercial use, potentially capitalising on proximity to Heathrow Airport, and reflecting the existing commercial landuses adjacent to the east and south.</p> <p>As a result, it is considered that allocating the site for dwellings is short sighted when a commercial use is clearly more appropriate for the longer term strategic economic interests of Spelthorne Borough. The site forms an obvious extension to the Blackburn Trading Estate, where other space for expansion between Clare Road and Long Lane is limited, and would contribute to the colocation of commercial uses here.</p>	

The Blackburn Trading Estate would be enhanced by the commercial allocation of sites SN1/005 and SN1/006 and this is considered the preferable spatial strategy for these sites.

A substantial response document has been submitted as a representation, please see attached documents.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Please refer to submitted response document.

<b>Respondent: Tarmac Trading Ltd (43105057)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128515</b>	
<b>Policy / Evidence Base / Part of Plan: ST2/006 (Builders Yard, Gresham Road) - Pre-submission Spelthorne Local Plan (Reg 19) consultation</b>	
Add a response	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>Not justified, Not effective, Not consistent with national policy were also selected.</p> <p>This site was assessed at the preferred options stage as having scope for a higher density residential development to be achieved, and it was considered that the potential yield of the site could be 100 units. However, this potential is now considered to be approximately 343 units.</p> <p>Firstly, this allocation represents the loss of yet more commercial land in Spelthorne which ultimately loses existing and future employment opportunities and impacting on businesses that may be looking to relocate into the area. As an example, the Officer Site Assessments Draft Report notes this may lead to Jewson leaving the Borough as another Jewson site at Moor Lane on the other side of Staines town centre has been granted planning permission for a housing redevelopment.</p> <p>In addition, the proposed density is a significant uplift from what was previously considered acceptable and there are serious concerns that this could lead to overdevelopment. Although close to the town centre, the site is separated isolated by the railway line and as a result, is much more closely associated with the built form to the south which is comprised of medium density</p>	

residential development.

Overall, greater consideration needs to be given to retaining centrally located commercial uses instead of replacing them with residential development. And where such replacement is considered acceptable, densities should be optimal in accordance with Paragraph 125 of the NPPF. A substantial response document has been submitted as a representation, please see attached documents.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: Please refer to submitted response document.

<b>Respondent: Julie Thompson (41905793)</b>
<b>Organisation:</b>

<b>Response ID: 1115674</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I wish to support this land as 'Local green space' It is vital to reduce flooding in my local area, something that is very common in the surrounding roads. Whilst I no longer have small children, my daughter played out there everyday growing up as do other local children. We have locally held street parties and firework night parties on our green. Our tree is home to a variety of wild birds and they would probably benefit from more shrubs.
<b>Question 6:</b> You can upload any modifications below.
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Paul Thompson (19550241)</b>
<b>Organisation: LoSRA</b>

<b>Response ID: 1119576</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
<p>LOSRA is a long established (50 yrs) and well-respected residents' association. The Association's purpose is to optimise and enhance the quality of life for Lower Sunbury residents and one of our key strategies and objectives is to "press for the preservation and extension of Green Belt and public open space". See <a href="https://www.losra.org/about-losra/losras-aims">https://www.losra.org/about-losra/losras-aims</a></p> <p>In preparing this submission, we have collaborated closely with Keep Kempton Green, whose principal objective is to defend Kempton Park, rated Strongly Performing Green Belt, against any possible residential development now or in the future, and we have shared legal advice. LOSRA strongly supports KKG's submission.</p> <p>There are currently in the order of 4,500 households in the Lower Sunbury area. The Draft Local Plan would increase the number of households in the area by some 770, of which some 270 would be on five separate Green Belt sites totalling approx. 8.5 hectares of existing Green Belt land. Despite the</p>

Association's concern and general opposition to any Green Belt land being proposed for development, the Association appreciates and understands the serious problems that the Borough has had in trying to accommodate the ridiculous and out of date housing target of 618dpa set by Central Government. As stated in the Foreword to the Draft Local Plan, that Standard Method uses household growth projections almost a decade old. If subsequent projections were used, the 618 figure would be reduced to 347 per annum – 44 per cent lower. The Standard Method therefore hugely overstates the housing need in Spelthorne. Also, as set out in the Foreword, to achieve the 618 figure has required very difficult compromises across the Borough. The sentiments expressed in the Foreword accurately encapsulate those felt by residents throughout the Borough. The Association agrees with the views as expressed in the Foreword. The Association has never supported the development of our precious Green Belt and the proposals contained within the draft plan are inimical to our published objectives. Nevertheless, if the impossibly high figure of 618 dpa is to be achieved we have no option but to accept that modest sacrifices are required to be made, and in the spirit of that compromise and with the urgent need to get an approved Local Plan on the statute books the Association is prepared to support the Local Plan as set out in the Pre-Submission.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Paul Thompson (19550241)</b>
<b>Organisation: LoSRA</b>

<b>Response ID: 1124639</b>
<b>Policy / Evidence Base / Part of Plan: Policy PS1: Responding to the climate emergency</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
There have been various attempts/approaches by developers to try to obtain planning approval for housing developments on larger Green Belt sites in Lower Sunbury, both at Kempton Park and at Stratton Road. Development of either of these two sites would have a much more significant impact in terms of loss of Green Belt land and infrastructure requirements – in the case of Kempton Park specifically, the additional traffic that any development would impose on the already overburdened A308 in both directions towards Hampton Court and Sunbury Cross/Staines would be intolerable. No evidence has ever been produced to show that this could be mitigated. The Association and other local residents’ groups would very strongly oppose the development of either of these two sites. If, as undoubtably they will, either of the sites are promoted by developers at the Examination in public, the Association would ask that we be given the opportunity to set out its views to the Inspector.
<b>Question 6: You can upload any modifications below.</b>

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Paul Thompson (19550241)</b>
<b>Organisation: LoSRA</b>

<b>Response ID: 1119577</b>
<b>Policy / Evidence Base / Part of Plan: Policy ID1: Infrastructure and Delivery</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
We believe, as set out in the IDP, that there are still some unresolved infrastructure issues, particularly related to financing the extra burden the additional population will put on health, education, social services and transport. Lower Sunbury has felt the burden of substantial cumulative development over the past decade or so, none of which has been mitigated by the provision of extra healthcare, educational or other infrastructural facilities, with the result that, for example, the Sunbury Health Centre is one of the most over-subscribed health centres in England; one particularly large development resulted in the loss of a very large public open space in the centre of the village; and there has been growing pressure on school places in Sunbury.
In Lower Sunbury alone the additional households will likely result in an increase in population of some 1,800 – nearly a 20% increase over the plan period. That excludes coping with the additional numbers who will be using the schools and health facilities in Lower Sunbury from other areas. The

proposed 6<sup>th</sup> Form College, whilst a welcome development from the perspective of the provision of additional choice for pupils from the local area, is likely to attract additional traffic at peak periods.  
However, so far as we can assess from the information available, we believe the plan to be sustainable and as stated above support it.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Anne Thomsett (41644289)</b>	
<b>Organisation:</b>	
<b>Response ID: 1124229</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Re: KEMPTON PARK DEVELOPMENT In response to your latest newsletter, I wish to register my objection to the above development on the grounds that the surrounding roads are nowhere nearly adequate enough to accommodate the amount of traffic which will be generated by such a densely populated area. And the amount of pollution the extra traffic will generate doesn't bear thinking about. I went to one of their consultation displays some while ago and they just brushed away any concerns.	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Susanne Thornton (41994049)</b>
<b>Organisation:</b>

<b>Response ID: 1124602</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I must write to you to express my dismay and sadness at the decision of the Spelthorne Council to consider the dismantling of the Green Belt in so many places. I appreciate there are severe housing needs but all of your Councillors and members of the Local Plan do know about climate change. To mitigate the dangers of climate change we must preserve trees and vegetation. We live in an extremely high area of pollution with motorways and airports all around. Trees help to off set some of this pollution. We need vegetation for wild life particularly bees and insects which are vital to our ecosystem. We are an area prone to flooding and more houses, more areas of concrete will have an impact on drains and water not able to soak away. When there is a lot of residences and little green space this can cause mental health problems. I am sure the planned developments have not been designed to give plenty of space but will have people crammed in to small rooms with few parking facilities as we have seen in other developments. I do

hope these points are being raised by many people. Green Belt boundaries need respecting (and ideally increasing) and not making a special case for huge housing developments.

I have heard that some councillors are making claims that areas in Green Belt are “weakly performing” and making that an excuse to release them. I would like to endorse the following statement: All Green Belt sites perform a function by checking the unrestricted sprawl of large built up areas, preventing neighbouring towns from merging into one another, assisting in safeguarding the countryside from encroachment, preserving the setting and special character of historic towns; and – extremely importantly - assisting in urban regeneration, by encouraging the recycling of derelict and other urban land (para.138 of the National Planning Policy Framework). All Green Belt is of considerable importance, is valued by residents and should remain protected.

I am also disappointed that the Council seem to have disregarded the needs of residents for Green belt areas in their locale. Please look at these 19 sites again.

Some building will be essential but I sincerely hope the planning department at Spelthorne will ensure that the developers have to obey the rules set up to mitigate climate change - very good insulation, surfaces which will allow water to seep through, heat pumps.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Jerry Unsworth (41803201)</b>
<b>Organisation: Colne Valley Park Trust</b>

<b>Response ID: 1114371</b>
<b>Policy / Evidence Base / Part of Plan: Policy SP5: Colne Valley Regional Park</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not effective
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
We welcome the policy SP5 to promote improvement of the Park's natural environment and access to it. However, some small adjustments to the wording are needed to improve its effectiveness and avoid misinterpretation.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Adjustment of the Policy Text (SP5 Section 1 on page 50) as follows (new wording in red and deleted text in strikethrough): 1) The extent of the Colne Valley Regional Park (CVRP) within the Borough is defined on the Policies Map. As a member of the CVRP, the Council will seek to maintain the character and landscape of the Park and promote its enhancement and benefits. Adjustment of the supporting text (para 5.23 on page 50) as follows: The Colne Valley Regional Park was conceived in the 1960's with the broad aims including

providing for informal recreation in a countryside setting.  
This is because the CVRP has several objectives (as set out in our introductory and overview statement in our Part A proforma) and providing recreation opportunities is just one of them.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Jerry Unsworth (41803201)</b>
<b>Organisation: Colne Valley Park Trust</b>

<b>Response ID: 1114382</b>
<b>Policy / Evidence Base / Part of Plan: Policy SP7: Heathrow Airport</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
We object to the policy as we consider it: • Too open to interpretation • Could lead to widespread environmental harm and irreversible damage to the integrity of the Green Belt and CVRP • Omits specific reference to the importance of protecting and enhancing the natural environment across the Colne Valley The CVRP strongly objected to the previous proposal for Heathrow expansion involving a 3 <sup>rd</sup> runway and large-scale associated ‘airport supporting development’, much of which fell within the Green Belt in the CVRP boundary. At this stage it is not known what a future expansion proposal will look like, and its implications and impacts within Spelthorne Borough are unknown. What is clear is that the Green Belt in Spelthorne is to be protected in line with national policy and that policy should not be repeated or adjusted in this policy. It is clear that, at this juncture the Council does not see that the case has been made out to accommodate major development in its Green Belt, as it is stated in para 3.6 of ‘Topic Paper 1: Background to Strategy and case for Exceptional Circumstances to amend Green Belt boundaries’ that: “We have reviewed the case for amending Green Belt boundaries for other purposes and consider that Exceptional Circumstances do not exist at this time.” Whether development proposals at the time meet the tests of Green Belt and other national policy will need to be assessed at the time. We note that the statement made in para 5.35 “Despite the Supreme Court’s ruling in

2020 that the proposed expansion can go ahead and would not be unlawful ....” is not entirely accurate. It only concerned the principle and a decision on whether a particular expansion “can go ahead” will be subject to due process.

The statement made in the Sustainability Appraisal, page 100 & 101, against SP6 – Heathrow Airport “Due to the uncertainties associated with any possible expansion of Heathrow Airport there are many unknowns for the policy. The policy has included measures mitigate negative impacts and this increases its sustainability credentials.” confirms that there is a lot of conjecture and great care is therefore required in any policy in the Plan.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

We would prefer the policy to be deleted but suggest modifications to address the eventuality that a policy is retained.

See separate sheet at end of this representation for the detail.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: 1. We consider that an important planning issue is raised in our representation that requires

round-table discussion amongst key interested parties, guided by the Inspector(s).

2. The CVRP is supported by several organisations and people and is not merely an individual.

It merits being heard in the Examination.

<b>Respondent: Mr Jerry Unsworth (41803201)</b>
<b>Organisation: Colne Valley Park Trust</b>

<b>Response ID: 1114381</b>
<b>Policy / Evidence Base / Part of Plan: Policy H3: Meeting the needs of Gypsy, Traveller and Travelling Showpeople</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Our objection to this policy (Meeting the needs of Gypsy, Traveller and Travelling Showpeople) is restricted to the context it provides for the specific allocation in the Plan: ST1/043 - Land East of 355 London Road). We address our objections to this site in a separate representation.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Adjustment of the Policy Text (page 75) to omit reference to “In addition to site allocations in this Plan”, in so far as that relates to the site allocation (at ST1/043 Land East of 355 London Road, Staines). Our reasons for this are set out in the separate representation.
<b>Question 6: You can upload any modifications below.</b>
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Jerry Unsworth (41803201)</b>	
<b>Organisation: Colne Valley Park Trust</b>	
<b>Response ID: 1114372</b>	
<b>Policy / Evidence Base / Part of Plan: ST1/043 (Land East of 355 London Road)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not consistent with national policy	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>We object to this allocation on London Road, Staines. The site occupies a prominent location on the edge of the CVRP and Green Belt and its loss to development will reduce the feeling of openness. The perimeters of the reservoirs in the southern part of the CVRP perform an important role providing a green context and foil to the nearby development and this applies here in relation to the large urban area of Staines. Further urbanising this prominent frontage would have a significant adverse effect on the function of the Green Belt and wider value of the CVRP as a countryside resource. We include these images to illustrate our points. The site makes a major contribution to openness and performs strongly against the fundamental aim of Green Belt policy “to prevent urban sprawl by keeping land permanently open”. We are in no doubt that the site strongly performs against Green Belt purposes. The existence of development elsewhere in the vicinity provides no justification for this allocation – the edge of urban areas is where careful planning is most needed. We also highlight that no compensatory improvements to the environmental quality/ accessibility of remaining GB land are allowed for in line with NPPF Para 142. This seems to be an absent feature from allocations being made in the Green Belt.</p> <p>For the reasons we have summarised above, we do not agree with the assessment of this site - about the contribution it makes to Green Belt purposes and the comments made – as included on pages 66-69 in the Green Belt Assessment Stage 3 Report (July 2022). This erroneous assessment has also</p>	

informed the Sustainability Appraisal commentary and conclusions as set out on pages 312-314, in particular the 'neutral' summary and "Moderately Performing / Less Important" conclusion.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

The site allocation should be deleted.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Jerry Unsworth (41803201)</b>
<b>Organisation: Colne Valley Park Trust</b>

<b>Response ID: 1114379</b>
<b>Policy / Evidence Base / Part of Plan: ST4/025 (Coppermill Road)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
NB: The following part in bold moved from another response Our objection to this Policy (Planning for the Borough) is restricted to the context it provides for the specific housing allocation in the Plan ST4/025 - Coppermill Rd in the Table at the top of Page 20. We address our objections to this site in a separate representation.  We object to this allocation at the junction of Coppermill Rd and Stanwell Rd, Wraysbury. The site occupies a prominent location in the CVRP and Green Belt and its loss to development will greatly reduce the feeling of openness at a key public vantage point. The perimeters of the reservoirs in the southern part of the CVRP perform an important role providing a green context and foil to the ribbon of housing along Coppermill Rd and other development along Stanwell Rd in Horton. This parcel of land also complements the green frontage and natural environment provided by the nearby Poyle Poplars and the Arthur Jacob Nature Reserve to the north. Urbanising this prominent corner would have a very significant adverse effect on the function of the Green Belt and value of the CVRP as a countryside resource. We include these images to illustrate our points. The site makes a major

contribution to openness and performs strongly against the fundamental aim of Green Belt policy “to prevent urban sprawl by keeping land permanently open”.

It can be seen from this Ordnance Survey Map extract that a section of the Colne Valley Way (a longdistance, broadly north-south route) passes this site. The CVRP works hard to promote access to and enjoyment of the Green Belt and its natural environment across its area and this allocation will undermine that positive role. Each detrimental change also further erodes the ability of the Council to fulfil its duties as set out in NPPF Para 154 (we quote this in our introductory and overview statement within our Part A proforma). We are in no doubt that the site strongly performs against Green Belt purposes. The existence of housing along Coppermill Rd provides no justification for this allocation – the edge of urban areas is where careful planning is most needed. We also highlight that no compensatory improvements to the environmental quality/ accessibility of remaining GB land are allowed for in line with NPPF Para 142. This seems to be an absent feature from allocations being made in the Green Belt.

For the reasons we have summarised above, we do not agree with the assessment of this site - about the contribution it makes to Green Belt purposes and the comments made – as included on pages 70-73 in the Green Belt Assessment Stage 3 Report (July 2022). This erroneous assessment has also informed the Sustainability Appraisal commentary and conclusions as set out on pages 343/ 344, in particular the ‘neutral’ impact conclusion under “8. Open space and landscape”, the overall ‘neutral’ summary and “Moderately Performing / Less Important” conclusion.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

NB: First paragraph from another response

The table at the top of page 20 should be amended to reduce the specific allocations (presently 6073, with 829 in the Green Belt) by the 15 units (approx..) that the ST4/ 025 would contribute. The respective figures should be 6058 and 814.

The allocation should be deleted from the Plan as it is not justified and not in accordance with national policy.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: 1. We consider that an important planning issue is raised in our representation that requires

round-table discussion amongst key interested parties, guided by the Inspector(s).

2. The CVRP is supported by several organisations and people and is not merely an individual.

It merits being heard in the Examination.

<b>Respondent: Mr Jerry Unsworth (41803201)</b>
<b>Organisation: Colne Valley Park Trust</b>

<b>Response ID: 1114374</b>
<b>Policy / Evidence Base / Part of Plan: ST4/023 (Two Rivers Retail Park Terrace, Mustard Mill Road, Staines)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: can be made sounder and more effective
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not effective
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No objection to the allocation, as such, at Two Rivers Retail Park Terrace, Mustard Mill Road, Staines, for approx. 750 residential units and GF commercial/community use. However, because of the scale of the development, the proximity to the CVRP and the opportunity to enhance the natural environment associated with the two adjacent rivers (Wraysbury and Colne) and to provide better active travel connections we call for this to be accommodated, as far as possible, in scheme design and in contributions to off-site improvements. Adjustments to the policy can provide for this.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
In the allocation details on pages 206 and 207 insert: The following text under 'Site Specific Requirements': "Sensitive design to take advantage of and enhance the setting of the two adjacent rivers (Wraysbury and Colne) and provide better active travel connections to the Colne Valley Regional Park, including through contributions to off-site improvements.

The following text under 'Opportunities': "The enhancement of the natural environment associated with the two adjacent rivers (Wraysbury and Colne) and access to the natural environment within the nearby Colne Valley Regional Park."

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: USS (Universities Superannuation Scheme) (26325825)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128582</b>	
<b>Policy / Evidence Base / Part of Plan: Policy SP1: Staines-upon-Thames</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: subject to representation comments
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: subject to representation comments
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: subject to representation comments
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
<p>Policy SP1 Staines-upon-Thames and SP2 Designing Places and Spaces</p> <p>Draft Policy SP1 'Staines-upon-Thames' relates to the spatial strategy for Staines-upon-Thames and recognising its size, location and significant opportunity for further regeneration, identifies that this area will be a key focus for housing, employment and retail development in the Borough. It also states that new development in Staines is likely to be high density in suitable locations within the town centre to maximise efficient use of land but will be expected to achieve high quality design. USS supports this guidance and considers it sound and relevant for the delivery of ST4/004.</p> <p>Additionally, draft Policy SP1 states that tall buildings will be designed to reflect the redefined character of Staines and the design is to be of a high standard. Draft Policy SP2 'Designing places and spaces' sets out that for major developments, particularly those exceeding 50 dwellings, it may not</p>	

always be desirable to reflect locally distinct patterns of development. It states “these sites should create their own identity” which USS considers a sound objective for relevant developments and achievable within the context of site allocation ST4/004.  
See attached document for full rep.

**Question 6:** You can upload any modifications below.

USS Reps to Pre-submission Spelthorne Local Plan \_Reg 19\_\_ Redacted.pdf

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[/USS%20Reps%20to%20Pre%20Submission%20Spelthorne%20Local%20Plan%20%5FReg%2019%5F%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618984/PDF/-/USS%20Reps%20to%20Pre%20Submission%20Spelthorne%20Local%20Plan%20%5FReg%2019%5F%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: USS (Universities Superannuation Scheme) (26325825)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128583</b>	
<b>Policy / Evidence Base / Part of Plan: Policy EC1: Meeting Employment Needs</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: subject to representation comments
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: subject to representation comments
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: subject to representation comments
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>Policy E1 Meeting Employment Needs</p> <p>Whilst USS supports the preferred allocation for residential development, the Site currently operates efficiently as a mixture of E, B2 and B8 uses which are occupied by several companies. Until residential development comes forward on the Site, these existing uses can continue to operate and flexibility to maintain a mixture of E, B2 and B8 uses should continue to be applied in order to allow the Site to operate efficiently.</p> <p>USS supports Draft Policy EC1 'Meeting Employment Needs' and the flexibility this policy provides in supporting 'proposals to redevelop outmoded employment floorspace to cater for modern business needs' to promote business competitiveness and allow flexibility to cater for changing business needs within the economy.</p> <p>See attached for full rep.</p>	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No Response	



**Question 6:** You can upload any modifications below.

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[/USS%20Reps%20to%20Pre%20Submission%20Spelthorne%20Local%20Plan%20%5FReg%2019%5F%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618986/PDF/-/USS%20Reps%20to%20Pre%20Submission%20Spelthorne%20Local%20Plan%20%5FReg%2019%5F%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: USS (Universities Superannuation Scheme) (26325825)</b>	
<b>Organisation:</b>	
<b>Response ID: 1128584</b>	
<b>Policy / Evidence Base / Part of Plan: ST4/004 (96-104 Church Street, Staines)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: subject to representation comments
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: subject to representation comments
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: subject to representation comments
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
Deloitte has previously submitted representations to increase the allocation of residential development at the Site. On 21 January 2020, Deloitte submitted representations to the Spelthorne Local Plan Preferred Options Consultation on behalf of USS. In principle, this supported the preferred allocation for residential development at 96-104 Church Street. However, it recommended that the housing allocation was increased from 55 dwellings to approximately 100 dwellings which reflects the Site's highly sustainable location and layout which allows for this increase in housing density. Following these representations, Deloitte, on behalf of USS, was invited to submit a Deliverability Proforma for the Site. This Proforma was submitted on 7 May 2021 and recommended higher housing densities on the sustainably located Site.	

The Site 96-104 Church Street is situated on the southern side of Church Street, within the urban area, 350 metres to the west of Staines town centre. The USS Site is approximately 0.9 hectares in area and consists of a three storey office building on the northernmost part of the Site, six warehouse buildings and associated parking spaces. The buildings on the Site currently operate under E, B2 and B8 uses and are occupied by several companies. The Site is accessed via Church Street.

A small area of the southern part of the Site is in Flood Zone 3a, whilst the majority of the Site is in Flood Zone 2. The Site is also located within the Staines Conservation Area. The two-storey, mid to late 18<sup>th</sup> Century building located adjacent to the north of the Site at 114 Church Street is Grade II listed. There is also a Grade II listed railing and gate piers fronting Church Street for Numbers 96-100 and 104 Church Street. The rear of these buildings is adjacent to the northern boundary of the Site. The three-storey office building located on the Site is locally listed. However, the local listing only relates to the front part of the building as this is all that remains of the original three storey structure.

The Site is a brownfield site and is identified as a preferred allocation for residential development in the Local Plan Preferred Options document and the Pre-submission Spelthorne Local Plan (Regulation 19) to deliver approximately 100 dwellings. (see attached document for map, page 2)

#### Surroundings

To the north and east of the Site is a residential area and to the south is the River Thames. The dominant surrounding use is residential, which mainly comprises low density, two storey dwellings. To the west of the Site is a three-storey office building which is occupied by the software company Service Now UK&I.

The Site is in a sustainable location as it is located approximately 200 metres west of Staines Town Centre which provides local amenities such as shops, cafes, restaurants, hairdressers and leisure facilities. Additionally, Staines Train Station is approximately 1 km south east of the Site which offers direct services to London, Windsor and Reading. There are also several bus stops nearby, including on Wraysbury Road and Bridge Street, these bus stops provide access to Slough, Heathrow, Woking, Colnbrook and Egham Hythe.

#### Planning History

The Site has been subject to previous planning applications for redevelopment. The most recent planning permission was submitted by USS and granted on 27 January 2014 for redevelopment of the Site to provide 48 residential dwellings, as follows (under ref. 12/01700/FUL):

“Demolition of the existing industrial/warehousing units and redevelopment of the site to provide 16 houses and 32 apartments (11 no. 1-bed, 19 no. 2-bed, 16 no. 3-bed and 2 no. 4-bed units). Provision of associated amenity space, landscaping, car parking, cycle storage, works to boundary wall and other works. Relocation of existing office parking.”

This permission subsequently lapsed, though it established the principle of residential development for the Site. Since the previous permission was granted, the need for housing in Spelthorne has increased. Policy H1 of the adopted Core Strategy 2009 set out mechanisms to ensure the delivery of 166 dwellings per annum which has been determined using the Government’s standard methodology for calculating local housing need. The Pre-submission Spelthorne Local Plan (Regulation 19) has an annual requirement of at least 618 dwellings per annum. This is a further increase from the annual requirement of at least 603 dwellings per annum as identified within the Preferred Options Consultation Local Plan. This identifies a

much greater housing need and Spelthorne's planning policies need to plan positively for new development to address this need.

ST4/004

The Pre-submission Spelthorne Local Plan (Regulation 19) identifies the majority of the USS asset as a site allocation (ST4/004) for residential development, but excludes the locally listed building on the northern part of the Site, as shown in the map extract below. (see attached document, page 4)

The site allocation identifies the Site as a proposed allocation to deliver approximately 100 dwellings, with expected delivery between 2028 - 2033. The document provides several site-specific requirements where a developer will be required to deliver the following:

- "A well-designed scheme that has a positive relationship with nearby town centre uses and residential properties.
- Conserve and, where possible, enhance Staines Conservation Area and the setting of nearby listed buildings along Church Street.
- Include measures to mitigate the impact of development on the local road network and take account of impacts on the strategic road network as identified through a site-specific Travel Plan and Transport Assessment.
- Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms.
- Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy DS2 to make buildings zero carbon where possible."

USS Response

USS supports the abovementioned site-specific requirements as outlined within ST4/004 and considers these as appropriate measures to ensure the development is delivered in a successful manner which harnesses the opportunities available at the Site.

USS supports the site allocation to deliver approximately 100 residential dwellings at the Site and considers this to be an efficient use of the land. The previous planning permission (ref. 12/01700/FUL) and proposed allocation in the Spelthorne Local Plan Preferred Options document set a precedent for residential development to be achieved on the Site. USS supports the increase of the site allocation from 55 dwellings in the Spelthorne Local Plan Preferred Options document to approximately 100 dwellings within the Pre-submission Spelthorne Local Plan for the reasons set out below.

Draft policy H1 'Homes for all' of the Pre-submission Spelthorne Local Plan states that the Council will make provision for at least an additional 618 dwellings per annum, as calculated using the standard method for assessing housing need in 2021. USS recognises this target as a substantial increase from Policy H1 of the adopted Core Strategy which seeks to deliver an additional 166 dwellings per annum. USS considers the allocation for approximately 100 homes under ST4/004 as an efficient use of the land which will assist the Council towards achieving its housing targets.

The Site is well located in a sustainable location within close proximity to Staines Town Centre. This means the Site is well suited to residential development as it is close to local services and amenities. The Site is also well located with regards to public transport accessibility, as Staines Train Station is located approximately 1km south east of the Site. The station provides direct links to London, Windsor and Reading, which are all key

employment locations within commuting distance. The Site is therefore in an accessible and sustainable location and is suitable for high-density residential development. USS owns the whole Site and it is therefore deliverable within plan period to contribute to the Council's housing need. The proposed redevelopment of this brownfield site would replace the current uses with a residential use, which would be in keeping with the surrounding area. This would improve the aesthetics of the Site, as well as enhancing and protecting the Conservation Area. This is complemented with Policy PS3 'Heritage, Conservation and Landscape' of the Pre-submission Spelthorne Local Plan which states that new development should make positive contributions to the surrounding environment, which include the listed buildings and the local streetscene.

The nature of the Site supports approximately 100 dwellings, as residential development can step-up from low-density at the northern end of the Site, which is adjacent to the existing residential development area, to higher density in the south east of the Site, adjacent to the existing employment area. Through contextual master planning of the site it will be possible to deliver high density housing, making efficient use of the land, without detrimentally impacting the residential area to the north of the site. USS seeks to achieve higher densities of housing to the south of the Site through detailed masterplanning and a considered design process to assess the most appropriate locations for increased housing within the Site.

This was supported by the Preferred Site Allocations Officer Site Assessment, which commented "there may be an opportunity for high density residential development in order to make an efficient use of land, in line with the preferred strategy." USS supports the removal of a prescribed housing density at ST4/004 as it encourages a design-led, high quality scheme which will maximise housing delivery and achieve an optimally efficient use the Site.

#### Conclusion

In summary, USS supports allocation ST4/004 for the delivery of approximately 100 residential dwellings at 96-104 Church Street and requests that it is carried through to the Local Plan that is submitted for examination. Until the Site comes forward for residential development, it can continue to operate within its current uses and appropriate flexibility should continue to be applied to allow it to operate efficiently.

See attached document for full response.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Christopher Veale (41293729)</b>	
<b>Organisation:</b>	
<b>Response ID: 1111836</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>Local Green Space: Sunbury Common: Catherine Drive</p> <p>I am writing to strongly support the re-classification of the open space in Catherine Drive, Sunbury as a Local Green Space.</p> <p>I am a resident of Catherine Drive so any changes of use or development will directly affect me and significantly diminish the quality of life for all residents, hence the protection afforded by the Local Green Space is vital.</p> <p>The open space hosts a number of mature trees which supports a wide range of wildlife including a number of bird, insect and bat species.</p> <p>Recent reports have highlighted the vital role green spaces play in preventing the development, or minimising the impact of heat islands in urban areas:</p> <p><a href="https://www.bbc.co.uk/news/uk-62126463">https://www.bbc.co.uk/news/uk-62126463</a></p> <p><a href="https://www.metlink.org/fieldwork-resource/urban-heat-island-introduction/">https://www.metlink.org/fieldwork-resource/urban-heat-island-introduction/</a></p>	

The open space is used by local children for vital exercise, improving their health whilst remaining in a safe environment close to supervision. It is also used as a social space enabling neighbours to meet, reducing isolation and loneliness among the residents.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Paul Wade (41496929)</b>
<b>Organisation:</b>

<b>Response ID: 1112398</b>	
<b>Policy / Evidence Base / Part of Plan: ST3/004 (Oast House, Kingston Road)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No because I am not legally qualified to respond with honesty to this question
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: with the information available No
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No	Additional Comments: Not qualified to answer
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
No Response	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Brian Wale (41509409)</b>
<b>Organisation:</b>

<b>Response ID: 1112461</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
LGF:Sunbury Common: Heatherlands We have lived in Heatherlands since the houses were built in 1965(57 years). Our children and grandchildren have been able to play on the green when they were small. The residents have always been friendly and look out for one another. If the green was built on the community aspect would disappear. It has been used for street parties during commemorative events. The small green makes Heatherlands a pleasant place to live. Please don't build on it and take it away.
<b>Question 6:</b> You can upload any modifications below.
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Neil Maitland Walker (41904993)</b>
<b>Organisation:</b>

<b>Response ID: 1124250</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
I support the non development of The 19 areas and other Green belt areas and other areas identified by local residents as of particular importance to the local residents as open green spaces I support the development of Sunbury Court for housing as long as any open green areas are available to local residents and others
<b>Question 6: You can upload any modifications below.</b>
No Response

<b>Question 7: If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>
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Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

**Respondent: Mr Neil Maitland Walker (41904993)**  
**Organisation:**

<b>Response ID: 1115662</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
I support the non development of The 19 areas and other Green belt areas and other areas identified by local residents as of particular importance to the local residents as open green spaces I support the development of Sunbury Court for housing as long as any open green areas are available to local residents and others	
<b>Question 6:</b> You can upload any modifications below.	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Ms Sinead Watson (41294817)</b>	
<b>Organisation:</b>	
<b>Response ID: 1111840</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>Green space Catherine drive</p> <p>After hearing the beloved green opposite my house was sold for £65,000 not so long ago I was greatly saddened, myself and a huge number of other residents tried so so hard to try and keep it but the price was to great to try and compete with. Now we have to try and fight by other options to try and keep it from being built on, which I am guessing is why it has been sold. My understanding it that green space have a preservation on it but that can be over ridden so we need some kind of stronger order on it. Tree preservations are currently in process and hopefully as the council you can organise something to not allow anything to be built.</p> <p>The 'green' as we all like to call it is used daily, the children of the road all love to play there, they all get on so well and it's so lovely to watch them from our window. My children included with 2 learning to walk on it and ride their bikes. Dog walkers including myself feel safe to let the dogs have a good run</p>	

around and play. As residents we always bring chairs out to catch up with each other sit in the sun play games and come together as friends as well as neighbours. It was a huge reason we brought the house 7 years ago and I'm willing to try anything to keep it the happy and safe place we all love, living at Catherine drive. I hope for your support and look forward to hearing from anyone whom can help

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Ms Sinead Watson (41294817)</b>
<b>Organisation:</b>

<b>Response ID: 1125962</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
After hearing the beloved green opposite my house was sold for £65,000 not so long ago I was greatly saddened, myself and a huge number of other residents tried so so hard to try and keep it but the price was to great to try and compete with. Now we have to try and fight by other options to try and keep it from being built on, which I am guessing is why it has been sold. My understanding it that green space have a preservation on it but that can be over ridden so we need some kind of stronger order on it. Tree preservations are currently in process and hopefully as the council you can organise something to not allow anything to be built. The 'green' as we all like to call it is used daily, the children of the road all love to play there, they all get on so well and it's so lovely to watch them from our window. My children included with 2 learning to walk on it and ride their bikes. Dog walkers including myself feel safe to let the dogs have a good run around and play. As residents we always bring chairs out to catch up with each other sit in the sun play games and come together as friends as well as

neighbours. It was a huge reason we brought the house 7 years ago and I'm willing to try anything to keep it the happy and safe place we all love, living at Catherine drive. I hope for your support and look forward to hearing from anyone whom can help  
I hope for your support and look forward to hearing from anyone whom can help

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Co Cllr Buddhi Weerasinghe (42098081)</b>
<b>Organisation:</b>

<b>Response ID: 1124637</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
We are writing to strongly support Spelthorne’s position that the lands mentioned below should remain Green Belt and that NO development whatsoever should be allowed on them. 1.Stratton Road Green Belt Reasons: Stratton Road piece of land is a major part of the Green Belt separating the communities of Sunbury and Halliford. This role of separating communities to stop them merging is a prime Green Belt function. The land has a rural feel appreciated by the surrounding houses and acts as a ‘green lung’ for the community. 2. Running Horse (Groveley Road)

It is a major part of Green Belt separating the communities of Sunbury and Feltham. This role of separating communities to stop them merging is a prime Green Belt function. The site is contiguous and unbroken with no boundaries between Sunbury and Feltham. As such, it strongly performs this prime function.

The land has often been used for crops, and when not cropped produces a great display of wildflowers in the summer. Sunbury Common is the most densely developed part of Sunbury, and this display is a welcome contribution to the environment. In addition, it is widely understood that the land is contaminated. The site has been secured, but any disturbance could put the whole site and possibly the greater community at risk. I cannot believe that anyone would want to risk this.

Protecting Green Belt is partly to encourage better use of Brown field sites. Sunbury is really doing its share on supplying brownfield sites especially around the Cross. In addition, Spelthorne has been forced to recommend release of some smaller Green belt sites, to meet housing numbers, but the effect of that is to save us from having to release larger sites like this.

Again, Sunbury is making a major contribution to this release. Most crucially of all, Spelthorne has met its housing target without the release of this site, so the case to say it must be released does not stack up. Spelthorne is absolutely right not to recommend release this site and I fully support that.

### 3.Kempton

Reasons:

The land fulfils many of the purposes of Green Belt separating the settlements of Sunbury and Hampton.

Both are historic Domesday settlements, except Kempton (Kenyngton or Chennestone) was then separate from Sunbury. Due west of the site, the settlement is heavily urbanised culminating in the high densities of Sunbury Cross. Hampton lacks the same urban heart but is otherwise very heavily urbanised. They are distinctly separate settlements with the border between them originally being part of the border between two 'Hundreds' Hampton being in the (then) the Hundreds of Hounslow rather than in Spelthorne. Currently, the border between the two is the border between London and Surrey, a very major boundary. So, Kempton Park Green Belt separates not just two communities but two regions.

On the Northern Boundary is a heronry that is part of the 'Southwest London Water Bodies' Ramsar site. As such it has world recognition for its contribution to waterfowl preservation. Even if this part of the site was not built on, any urban intensification in the area can only be very harmful.

As part of its proposal to meet housing needs, Spelthorne is proposing the release of a few smaller Green Belt sites for housing. A third of all those sites are in Sunbury, add to that the further proposed intensification of development around Sunbury Cross and the area is already making a significant contribution to meeting housing needs. But those proposals mean we do not have to even contemplate releasing such significant sites as this either in whole or in part.

Please find the attached detailed submission(s) for the submission contains location, reasons and contact details.

I would also like to take the opportunity to thank you for all your hard work on the local plan, this is appreciated by the residents of Spelthorne.

**Question 6:** You can upload any modifications below.

Local Plan Green Belt -Submission Kempton Park (1).docx

<https://spelthorne.inconsult.uk/gf2.ti/af/1409506/618965/DOCX/-/Local%20Plan%20Green%20Belt%20-Submission%20Kempton%20Park%20-%20Redact.docx>

Local Plan Green Belt -Submission Stratton Road (1).docx

<https://spelthorne.inconsult.uk/gf2.ti/af/1409506/618967/DOCX/-/Local%20Plan%20Green%20Belt%20-Submission%20Stratton%20Road%20-%20reacted.docx>

Local Plan Green Belt -Submission Running Horse *Groveley Road* (1).docx

[https://spelthorne.inconsult.uk/gf2.ti/af/1409506/618966/DOCX/-/Local%20Plan%20Green%20Belt%20-Submission%20Running%20Horse%20\\_Groveley%20Road%20-%20Redacted.docx](https://spelthorne.inconsult.uk/gf2.ti/af/1409506/618966/DOCX/-/Local%20Plan%20Green%20Belt%20-Submission%20Running%20Horse%20_Groveley%20Road%20-%20Redacted.docx)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Co Cllr Buddhi Weerasinghe (42098081)</b>	
<b>Organisation:</b>	
<b>Response ID: 1119413</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Please find the attached detailed submission for Local Green Space, the submission contains location map, photo, reason and contact details. This location is critical to be protected, and is highly valued by local residents. I would also like to take the opportunity to thank you for all your hard work on the local plan, this is appreciated by the residents of Spelthorne.	
<b>Question 6:</b> You can upload any modifications below.	
LGS- HSW - Upper Halli Rd TW17 2209p_Redacted.pdf <a href="https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619744/PDF/-/LGS%2D%20HSW%20%2D%20Upper%20Halli%20Rd%20TW17%202209p%5FRedacted%2Epdf">https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619744/PDF/-/LGS%2D%20HSW%20%2D%20Upper%20Halli%20Rd%20TW17%202209p%5FRedacted%2Epdf</a>	



LGS - HSW - Falcon TW16 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619745/PDF/-/LGS%20%2D%20HSW%20%2D%20Falcon%20TW16%202209p%5FRedacted%2Epdf>

LGS - SunE - Kenton Avenue TW16 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619746/PDF/-/LGS%20%2D%20SunE%20%2D%20Kenton%20Avenue%20TW16%202209p%5FRedacted%2Epdf>

LGS HSW Upper Halliford Green 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619747/PDF/-/LGS%20HSW%20Upper%20Halliford%20Green%202209p%5FRedacted%2Epdf>

LGS - SunE - Hamilton Place TW16 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619748/PDF/-/LGS%20%2D%20SunE%20%2D%20Hamilton%20Place%20TW16%202209p%5FRedacted%2Epdf>

LGS - SunE - Montford Rd TW16 2209p\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/619749/PDF/-/LGS%20%2D%20SunE%20%2D%20Montford%20Rd%20TW16%202209p%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Doug West (19744001)</b>
<b>Organisation:</b>

<b>Response ID: 1124604</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Please, Please, Please, fight to keep our Green Belt Area's ! Remember, you represent the residents and not the money making business and housing developers! We have seen the green belt areas around London, diminish drastically over the last 30 years or so, we NOW need to do everything to keep the status and stop these greedy people and companies destroying what's left! I understand the central Gov demands for all councils to provide more housing, but how can you possibly condone giving it up ! Once it's gone it's gone! Pictures speak a thousand words.....which one will you choose! (Please see attachment for related photographs)

Remaining hopeful, well a tiny bit, after all, usually these decisions have already been made and this is the council going thru the motions to prove they have followed correct processes and guidelines. (in my opinion)

**Question 6:** You can upload any modifications below.

West\_ Doug - photographs.docx

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Richard West (41799393)</b>
<b>Organisation: Future High Street Living (Staines) ICP Partnership Ltd.</b>

<b>Response ID: 1114325</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not consistent with national policy
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
1. FHSL support the LPA in seeking to deliver their objectively assessed need (OAN), based on the Government Standard methodology, over the plan period of 2022-2037, which equates to 9,270 dwellings (an annual requirement of 618 dwellings per annum). Table 1 of the Plan identifies how the LPA intend to meet this minimum target and have identified that a total of 9,439 dwellings are to be delivered. Buffer 2. Whilst FHSL are supportive of the LPA seeking to meet their OAN, there is significant concern that insufficient sites have been identified to achieve this target in practice, and does not include a sufficient buffer should there be any difficulty in the identified sites coming forward as planned. 3. Table 1 of the Local Plan identifies a total of 9,439 dwellings are anticipated to be delivered, against the requirement of a minimum of 9,270. This overprovision of 169 dwellings equates to a buffer of only 1.8% over the requirement. This is an insufficient buffer, especially when considering the difficulties faced by the LPA in delivering housing in recent years. Whilst it is acknowledged that a 5% under-delivery discount has been applied to Allocation and Brownfield Tier 2 sites, this remains of concern. 4. The Housing Delivery Test 2021 identifies that the LPA has only delivered 69% against its need over the past three years; noting that the housing requirement in these three years is lower than the Local Plan target per annum. Delivery over the past 5 years taken from the 2019, 2020 and 2021 Housing Delivery Test results is as follows: Year Housing Requirement Housing Delivery 2020/21 403 508 2019/20 552 228 2018/19 599 337

2017/18 424 221 2016/17 487 347 5. Due to the past delivery and limited buffer to protect against any undersupply against anticipated delivery, it is the view of FHSL that the plan is not positively prepared and would not be effective. 6. In order to make the plan sound, additional dwellings should be planned for, providing a greater buffer against need. Windfall Sites 7. In addition to the above, there is concern with the sites that have been identified, or lack of identification of sites that are anticipated to contribute towards the delivery of the required housing, 8. Paragraph 68 of the National Planning Policy Framework sets out that: 'Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of: a) specific, deliverable sites for years one to five of the plan period; and b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.'

9. Included within Table 1 of the local plan as contributing towards housing land supply, is identification of 570 units to be delivered by unidentified 'Windfall: Small sites'. Clearly, these sites are not specific or deliverable sites. 10. Further to the above, as included within Table 1 of the local plan as contributing towards housing land supply is identification of 275 units delivered by unidentified 'Windfall: Office to residential permitted development'. Again, these are not specific or deliverable sites. Additionally, it is not clear how both of these windfall allowances have been calculated and whether there is a degree of double-counting. 11. Notwithstanding paragraph 68, paragraph 71 of the National Planning Policy Framework sets out that: 'Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends (our emphasis). Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.'

12. Although paragraph 71 does allow for windfall sites to count towards supply, in this instance, it is not considered that there is sufficient evidence on which the LPA can rely to justify these inclusions. Paragraph 3.11 of the Local Plan relates to the justification of the inclusion of windfall sites but simply states: 'In addition, an allowance for small sites and office to residential permitted development has been identified based on past trends.'

13. Paragraph 71 of the NPPF makes clear that these allowances need to be based on compelling evidence, having regards to the SHLAA, historic windfall delivery rates, and expected future trends. It should be noted that the wording requires reliance on all three considerations through the use of the word 'and' instead of 'and/or'. The LPA has only relied on past trends according to the supporting text. If the LPA had a robust case and compelling evidence, it would be anticipated that there would be a topic paper or piece of supporting evidence accompanying the Local Plan, which there is not. 14. Furthermore, the LPA's reliance on past trends in relation to windfall sites comprising office to residential conversions is of particular concern. Past trends are likely to be as a result of the previously, less restrictive nature of these consents. However, over the past two-three years, the Government has curtailed permitted development rights for office to residential, restricting the floorspace of a building that can be converted. Therefore, given the curtailing of these permitted development rights, past trends cannot be relied upon going forwards. 15. Having regards to the above, it is the view of FHSL that this element of the plan is not justified. 16. For the plan to be found sound, these assumptions should be removed and additional units planned for. Housing Trajectory 17. Further to the above concerns regarding Windfalls Sites, this translates into concerns regarding the Housing Trajectory prepared by the Council. The trajectory sets out that 755 homes are anticipated to be delivered

in 2022-23. The supply of homes includes delivery of 192 dwellings from unimplemented commitments and it is questioned whether it is likely that these dwellings will be completed within the year. The housing trajectory is not supported by a detailed assessment (year-by-year) of when dwellings are anticipated to be delivered from sites. In light of this, there is concern that the Council will be unable to demonstrate the minimum of five-years' supply of deliverable home and as a result, the plan will not be effective. Green Belt Release 18. Table 1 of the local plan identifies that of the 6,073 units to be delivered as allocations, 829 of these are presently located within the Green Belt. 19. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. 20. Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. 21. Paragraph 140 of the NPPF states that: '140. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.' 22. In seeking to demonstrate exceptional circumstances, the NPPF requires at paragraph 141: '141. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy: a) makes as much use as possible of suitable brownfield sites and underutilised land; b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.' 23. In seeking to justify the release of Green Belt land, the LPA have prepared the topic paper, Topic Paper 1: Background to Strategy and case for Exceptional Circumstances to amend Green Belt boundaries. The topic paper provides 3 sections, an introduction, background, and exceptional circumstances. 24. Within the Background section, under the heading 'Housing Need Number', paragraph 2.17 reads: 'It is also worth noting that the zoning proposals for Staines are only likely to be considered sound by the Inspector if we are meeting the housing need in full throughout the Plan period. Zoning effectively limits potential housing supply by stipulating maximum heights and densities in certain more sensitive locations in the town, which could be seen as contrary to national policy on optimising development opportunities in urban and sustainable locations such as Staines. Our defence to this is that overall we will be meeting housing need and therefore this allows us the choice to consider limiting development potential in some areas where justified.' 25. The above identifies that the primary purpose/intention of releasing Green Belt land is as a result of seeking to limit the extent of development within Staines town centre. 26. The topic paper sets out that exceptional circumstances are justified through housing need, gypsy and traveller needs and community uses need. Whilst the paper sets out the background and the process that has been undertaken to reach the current stage; it does not set out in detail a process which accords with paragraph 141 of the NPPF and is therefore not justified. 27. The housing need is

summarised as: • Insufficient brownfield land to meet need in full • Chronic under delivery in past years • Provide family homes with gardens • Higher affordable provision (50% instead of 30% on brownfield) • Sites selected are the least ‘harmful’ in Green Belt terms and deliver the most benefit to outweigh the harms 28. The topic paper does not evidence how the plan makes as much use as possible of suitable brownfield sites and underutilised land; nor optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport. 29. As referred to at Paragraph 40 above, the topic paper makes clear that the approach has been to limit the extent of delivery within Staines town centre on brownfield sites, and then subsequently seek to deliver housing elsewhere, relying on Green Belt sites. 30. In considering the above, the topic paper does not demonstrate that all other reasonable options for meeting its identified need for development have been fully examined. The only approach taken has been to limit delivery in Staines town centre and then consider the release of Green Belts as a tool to justify imposing the limits on Staines town centre. 31. When considering the release of Green Belt, regard should be had to the responses to the Preferred Options consultation. This is set out at paragraph 1.7 of the Site Selection Methodology Paper, whereby it states: ‘It was also clear from the representations received to the Preferred Options consultation that the public had concerns about the loss of Green Belt, with a preference for previously developed land to be prioritised. In response to the comments received, the Council issued a formal call for sites in March 2021 to boost its urban land supply. The Council also reviewed the capacities of previously identified development sites in order to further boost supply and fully exhaust all supply in the urban area. This included an optimisation of densities in town centres, subject to local character considerations. (our emphasis)’ 32. The exceptional circumstances rely significantly on the Staines Development Framework being reasonable and justified. The Staines Development Framework is considered further below, but it is the view of FHSL, that there is potential to increase housing numbers within Staines town centre, and therefore there are not exceptional circumstances to justify Green Belt release, or at least to the extent that the LPA propose. Therefore, FHSL do not consider the release of Green Belt land to be justified or consistent with national policy. 33. In order to make the plan sound, the Council must suitably assess the effects of increasing densities in suitable locations such as Staines town centres, noting that previous officer assessments found that sites within Staines town centre could accommodate high-density, high-rise developments without adverse effects (see below for further details). Green Belt Sites 34. Notwithstanding that there is concern that there is insufficient justification for Green Belt release, there is also concern that the Green Belt sites proposed for release are not locationally sustainable and would perpetuate unsustainable travel patterns and reliance on the private car. These sites should not be considered suitable for release ahead of considering increasing densities within highly sustainable locations such as Staines town centre. 35. The following Green Belt sites proposed for release are of concern with regards to their locational sustainability.

- HS1/002 – Land at Croysdale Avenue/Hazelwood Drive, Sunbury
- HS1/009 – Bugle Nurseries, 171 Upper Halliford Road, Shepperton
- HS1/012 – Land East of Upper Halliford Road, Nursery Road, Sunbury
- HS1/012b – Land East of Upper Halliford Road (site B)
- HS2/004 – Land South of Nursery Road, Sunbury

- SN1/006 – Land to west of Long Lane and south of Blackburn Trading Estate, Stanwell
- ST4/025 – Land at Coppermill Road, Coppermill Road, Wraysbury 36.

In addition to the above, it is noted that allocation, AT1/002 – Land east of Ashford Sports Club, Woodthorpe Road, Ashford, is located within Flood Zone 2 and should not be preferred for release from Green Belt ahead of increasing densities on sites within Flood Zone 1. 37. In considering the above, it should be noted that on 14 October 2020, Spelthorne Borough Council declared a Climate Emergency, and Surrey County Council has also declared a Climate Emergency. Despite both Councils' actions, the plan proposes to seek the release of less sustainable, greenfield sites, in lieu of delivering highly sustainable developments on brownfield sites in the most sustainable locations in the borough.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

1. In order to make the plan sound, additional dwellings should be planned for, providing a greater buffer against need.
2. the assumptions in relation to windfall sites are not justified, should be removed and additional units planned for.
3. The housing trajectory should be reviewed and updated to reflect a more realistic trajectory, allocating further sites, where required to increase delivery the years 1-5.
4. The release of Green Belt sites is unjustified, or at the least the extent. The allocations of Green Belt should be removed and increased densities on brownfield sites, such as allocation ST4/019 supported.

**Question 6:** You can upload any modifications below.

Supporting Statement[3856]- Richard West, Cerda Planning\_Redacted.pdf

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[/Supporting%20Statement%5F3856%5F%2D%20Richard%20West%5F%20Cerda%20Planning%5FRedacted%2Epdf](#)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To identify and re-iterate the concerns raised above in relation to achieving an appropriate



development strategy, to need the needs of the borough.

<b>Respondent: Mr Richard West (41799393)</b>
<b>Organisation: Future High Street Living (Staines) ICP Partnership Ltd.</b>

<b>Response ID: 1114326</b>	
<b>Policy / Evidence Base / Part of Plan: Policy SP1: Staines-upon-Thames</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: Yes	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>1. This policy sets out that: ‘7) The Staines Development Framework sets out more sensitive character areas where height and density limits will apply to new buildings. Development proposals in the relevant zones will be expected to comply with these limits unless, in exceptional cases, there is robust justification for a deviation that weighs heavily in favour of granting permission. This could include a higher proportion of affordable housing than required by policy, exemplary design or significant benefits to the community.’</p> <p>2. The above seeks to strictly apply the densities and heights set out within the Staines Development Framework. However, it is identified within the SDF that the building heights and densities are guidance, and are therefore not designed to be strictly applied, but used as a guide. It is the view of FHSL that the current drafting of the policy is not justified.</p> <p>3. It is welcomed that the policy acknowledges that there can be circumstances where a departure from the heights and densities in the SDF would be justified. However, this relies upon there being an exceptional case with robust justification for a deviation weighing heavily in favour. It is the view of FHSL, that it should also be included that higher building heights and greater densities may be justifiable where the level of harm to sensitive receptors is not significant. This is considered to be necessary as the SDF applies blanket density and height restrictions over areas of the town centre, but there are</p>	

instances where there is not the same degree of harm as other areas within the same blanket restriction. FHSL consider this amendment to be necessary in order for the plan to be positively prepared.

4. Notwithstanding the above, FHSL do not support the restricted building heights and densities set out in the SDF but this is set out in a separate response to the Staines Development Framework.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

1. It should also be included that higher building heights and greater densities, than set out in the SDF, may be justifiable where the level of harm to sensitive receptors is not significant. This is considered to be necessary as the SDF applies blanket density and height restrictions over areas of the town centre, but there are instances where there is not the same degree of harm as other areas within the same blanket restriction. FHSL consider this amendment to be necessary in order for the plan to be positively prepared.

**Question 6:** You can upload any modifications below.

Supporting Statement[3856]- Richard West, Cerda Planning\_Redacted.pdf

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: This policy seeks to restrict building heights and densities in Staines town centre in accordance with an unjustified Staines Development Framework. FHSL has a key development site, comprising the former Debenhams store on High Street, where increased densities and height should be supported.

<b>Respondent: Mr Richard West (41799393)</b>
<b>Organisation: Future High Street Living (Staines) ICP Partnership Ltd.</b>

<b>Response ID: 1114324</b>
<b>Policy / Evidence Base / Part of Plan: Policy H1: Homes for All</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
1. This policy sets out that: '7) The Council is supportive of Build to Rent housing, where a need for this type of accommodation can be demonstrated. Where Build to Rent housing is proposed, the proportion of Affordable Housing provision should be in line with the benchmark level set by the Council and follow any up to date evidence, plans or strategies.' 2. The above policy is supportive of BtR which is welcomed; however, it places the onus on applicants to demonstrate that there is a need. This requirement is not justified, positively prepared, nor consistent with national policy. The Planning Practice Guidance, states, at Paragraph: 001 Reference ID: 60-001-20180913, that: 'As part of their plan making process, local planning authorities should use a local housing need assessment to take into account the need for a range of housing types and tenures in their area including provisions for those who wish to rent. Specific demographic data is available on open data communities which can be used to inform this process. The assessment will enable an evidencebased planning judgement to be made about the need for build to rent homes in the area, and how it can meet the housing needs of different demographic and social groups. If a need is identified, authorities should include a plan policy setting out their approach to promoting and accommodating build to rent. This should recognise the circumstances and locations where build to rent developments will be encouraged – for example as part of large sites and/or a town-centre regeneration area.' 3. The above places the onus on LPAs to undertake this work as part of their plan-making

process. Whilst consideration should be given to allowing applicants to demonstrate further need, the LPA should be identifying the need as part of the plan-making process. In light of this, the policy as drafted is not positively prepared and justified. 4. Furthermore, policy H1 sets out that the proportion of affordable housing provision should be in line within the benchmark level set by the council. However, the Planning Practice Guidance, states, at Paragraph: 002 Reference ID: 60-002-20180913, that: '20% is generally a suitable benchmark for the level of affordable private rent homes to be provided (and maintained in perpetuity) in any build to rent scheme. If local authorities wish to set a different proportion they should justify this using the evidence emerging from their local housing need assessment, and set the policy out in their local plan. Similarly, the guidance on viability permits developers, in exception, the opportunity to make a case seeking to differ from this benchmark.' 5. The above acknowledges that a different proportion of affordable housing may be set, as the LPA have sought to do here, however, they are required to justify this using the evidence emerging from their local housing need assessment which has not been demonstrated. Therefore, this policy is not justified, nor positively prepared.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

1. The plan should be amended to consider, identify and plan for the need for BtR, or remove the requirement for applicants to demonstrate this
2. The affordable housing provision for BtR schemes should be amended to 20% in accordance with national guidance, or the departure should be justified.

**Question 6:** You can upload any modifications below.

Supporting Statement[3856]- Richard West, Cerda Planning\_Redacted.pdf

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[/Supporting%20Statement%5F3856%5F%2D%20Richard%20West%5F%20Cerda%20Planning%5FRedacted%2Epdf](https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618856/PDF/-/Supporting%20Statement%5F3856%5F%2D%20Richard%20West%5F%20Cerda%20Planning%5FRedacted%2Epdf)

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No, I do not wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Richard West (41799393)</b>
<b>Organisation: Future High Street Living (Staines) ICP Partnership Ltd.</b>

<b>Response ID: 1114328</b>
<b>Policy / Evidence Base / Part of Plan: ST4/019 (Former Debenhams Site, High Street)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: Yes   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not positively prepared
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
<p>1. FHSL support the allocation of the for Debenhams store at 37-45 High Street for development. However, the proposed allocation identifies approximately 500sqm of commercial and 150 residential units to be delivered. In order for the policy to be positively prepared and to ensure that the Local Plan can deliver housing to meet its local need, the required housing numbers should be expressed as a minimum requirement to be delivered on-site, not approximately.</p> <p>2. Notwithstanding support for development on the site, FHSL are of the view that additional units should be allocated for development on the site seeking to maximise the efficiency of this brownfield site. Due to the viability and feasibility of converting the existing building, given its inefficiencies having been designed as a single, large retail space with tall ceilings, FHSL consider the most suitable approach to be for demolition of the existing building and redevelopment with a high-quality tall building proposal. Whilst an application for this has been refused, FHSL are considering options for appeal and discussion on potential future applications with the Council to address the concerns to find an agreeable position. The refusal of an application on the site, does not mean that a high-density, high-rise development on the site is not acceptable.</p>

3. The Officer Assessments accompanying the plan as an evidence base document, states, at Stage 2b of the assessment, that: 'Whilst the current building may be considered to hold some visual appeal, redevelopment would provide the opportunity to construct a high quality building to improve the overall visual amenity of the site. Whilst high rise development may be suitable in this location, this would be dependent upon a design of the highest quality given its prominent corner location within the High Street. This could allow for the creation of a 'landmark' building and could contribute to the regeneration of the Town Centre. Moderate impact on character and townscape identified however opportunity to improve appeal of the building.'

4. The assessment continues under the heading 'Council comments on potential use and yield': 'The site is located within Staines Town Centre with the opportunity for high-rise, high-density development. Nearby emerging schemes have set a precedent for this character of development within the town centre given the efficient use of land and sustainable location. Development at Charter Square, High Street equates to over 400dph, up to 11 storeys, whilst planned development at 17-51 London Road is more than 230 dph. The site could therefore accommodate high-density high-rise development and could potentially achieve 150-250 units with retail at the ground floor but this would depend on what height building would be acceptable and regard for the emerging Staines Development Framework zoning. Mix of units to be informed by the SHMA update.'

5. The officer assessment notes that the site could deliver up to 250 units. FHSL are of the view that the policy should be amended seeking to deliver a greater number of units than the minimum 150 identified as being deliverable. This would ensure that the plan is positively prepared and effective.

6. Under site-specific requirements, the policy requires that measures to mitigate the impact of the development on the local road network and strategic network are considered. Due to the highly sustainable location of the site, a car-free development should be supported on the site, which would in itself mitigate any effect on the local highway network. Conversely, by introducing residents into this highly sustainable location, accessible by sustainable modes of transport, it could alleviate existing network issues caused by those seeking to access the town centre by private car.

7. Under opportunities, the policy should be updated to acknowledge that the site offers a suitable location for high-rise, high-density development in accordance with officers' comments, and that the demolition of the existing building should be supported, with the limited harm caused being outweighed by the need to deliver homes in a highly sustainable location. 8. FHSL agree that a development is deliverable within periods 1-5 years.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

1. The policy should be amended to support a greater number of residential dwellings on the site, in accordance with
2. The number of dwellings to be delivered should be expressed as a minimum
3. The policy should support car free development, having regards to the highly sustainable location

**Question 6:** You can upload any modifications below.

Supporting Statement[3856]- Richard West, Cerda Planning\_Redacted.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/618862/PDF/-/Supporting%20Statement%5F3856%5F%2D%20Richard%20West%5F%20Cerde%20Planning%5FRedacted%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: To ensure that the Inspector is appropriately informed regarding the deliverability of the site, ensuring efficient and effective use of this highly sustainable site, result in a lesser requirement for release of greenfield/green belt sites.



<b>Respondent: Veronica West (42037057)</b>
<b>Organisation:</b>

<b>Response ID: 1124622</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I am writing to state that as a resident of Spelthorne I am deeply upset and worried that Spelthorne BC feel it is quite permissible to sell off green belt areas in the borough for monetary gain – there can be no other reason!! As a resident off Long Lane, Stanwell for the past 59 years I've seen the effects of all the extra housing that has been squeezed in to the area. There only has to be a 30 minute downfall of rain and Long Lane at the junction of Cranford Avenue floods. I watch the rain run out from the roads of the small trading estate opposite to where I live and join the river of water flowing down Long Lane to the junction with Cranford every time. I know just to the side of the same small trading estate the council have recently been doing tests on some rough ground with the intention of building on it. I know this because I asked the people doing the tests why they were doing it. I've had no formal letter from Spelthorne showing what is in the plans but this will result in even more flooding issues if this waste land is also built on.

What sort of compensation will the council give the poor residents living near the Cranford Avenue junction when eventually their properties will be flooded, if not already devalued for the threat of potential flooding?  
I watch with real concern the reports on climate change and this year has been a clear warning to us all with the very long dry summer we had to endure. I think it is about time that Spelthorne B.C. acted responsibly and thought of the future instead of how they can make a quick profit.  
Please see attached documents for images.

**Question 6:** You can upload any modifications below.

West\_ Veronica - supporting documents.docx

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/603807/DOCX/-/West%5F%20Veronica%20%2D%20supporting%20documents%2Edocx>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Roger W Whelan (40878625)</b>
<b>Organisation:</b>

<b>Response ID: 1112345</b>
<b>Policy / Evidence Base / Part of Plan: Policy SP1: Staines-upon-Thames</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
As a resident of Staines since 1965 it is clear that you are intending to turn Staines into a concrete jungle. This does not seem to include to local infrastructure. What about parking, doctors. hospitals, schools, policing etc.. We are already finding it almost impossible to speak to a doctor let alone have a face to face appointment. Staines is already beginning to look like an eyesore with the high rise complex in London Road. I thought the local councillors are there to represent the local residents. Perhaps they are there to feather their own nests with salaries??? and pension pots. The used to be elected to have the local communities at heart (as volunteers) but this does not seem to the case anymore Staines is already over populated with very little of the Staines as we oldies knew it. The shops are closing, and more will, with the cost of living crisis. At least the councillors will have the benefit of maintaining their income. Are any of the Borough councillors linked to the developers who want to turn Staines into a concrete ghetto????

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ian White (41994145)</b>
<b>Organisation:</b>

<b>Response ID: 1127109</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Please see the email appended below, issued by the North Surrey Green Party, drawing attention to your refusal to protect most of Spelthorne Borough's existing green belt. In an area long-blighted, alas, by the existence of a major world airport in its midst, your priority should be, for the reasons eloquently articulated below, to increase green belt land, if anything - certainly not to reduce it! Your intention, therefore, to remove protection from two-thirds of protected local green spaces can only be regarded as unconscionable, not to say downright perverse. Spelthorne is already "developed" beyond what can be considered reasonable for healthy and civilized living. It is, therefore, extraordinary that a Council we have elected to preserve and improve such amenities as exist should irresponsibly appear to be working towards making Spelthorne a less and less desirable borough for anyone to live in!

Furthermore, since the recent election of a new Prime Minister, it has been authoritatively stated that, to relieve pressure in SE England, there will in future be a policy of distributing population increases to other parts of the UK.  
In these and the circumstances set out by the North Surrey Green Party, I submit that you should, at the very least, publicly make it clear that, with regard to our green belt spaces, you have no plans to change the status quo.  
The related email referred to above was circulated by GB Campaign (who have submitted a separate representation) to local residents/business/persons of interest. Please see attachment.

**Question 6:** You can upload any modifications below.

White\_ lan - document.docx

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/612771/DOCX/-/White%5F%20lan%20%2D%20document%2Edocx>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Ian White (41994145)</b>
<b>Organisation:</b>

<b>Response ID: 1125963</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Please see the email appended below, issued by the North Surrey Green Party, drawing attention to your refusal to protect most of Spelthorne Borough's existing green belt. In an area long-blighted, alas, by the existence of a major world airport in its midst, your priority should be, for the reasons eloquently articulated below, to increase green belt land, if anything - certainly not to reduce it! Your intention, therefore, to remove protection from two-thirds of protected local green spaces can only be regarded as unconscionable, not to say downright perverse. Spelthorne is already "developed" beyond what can be considered reasonable for healthy and civilized living. It is, therefore, extraordinary that a Council we have elected to preserve and improve such amenities as exist should irresponsibly appear to be working towards making Spelthorne a less and less desirable borough for anyone to live in!

Furthermore, since the recent election of a new Prime Minister, it has been authoritatively stated that, to relieve pressure in SE England, there will in future be a policy of distributing population increases to other parts of the UK.  
In these and the circumstances set out by the North Surrey Green Party, I submit that you should, at the very least, publicly make it clear that, with regard to our green belt spaces, you have no plans to change the status quo.  
The related email referred to above was circulated by GB Campaign (who have submitted a separate representation) to local residents/business/persons of interest. Please see attachment.

**Question 6:** You can upload any modifications below.

White\_ lan - document.docx

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/607559/DOCX/-/White%5F%20lan%20%2D%20document%2Edocx>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mrs Deirdre Whybrow (41589697)</b>
<b>Organisation:</b>

<b>Response ID: 1112956</b>
<b>Policy / Evidence Base / Part of Plan: ST4/004 (96-104 Church Street, Staines)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
I live in 114B Church Street and my house is adjacent to the business park. I bought it just over 2 years ago and absolutely love living here. The thought of a housing development being built there fills me with dread. 1. I do not want to put up with the noise of the building which will continue for years. 2. I am absolutely appalled at the prospect of approximately 100 units of 5-6 storeys overlooking our peaceful property. 3. What about the privacy of the of the people living in 114? 4. There will be all the extra traffic that goes with such a development as well. 5. The quiet village community we enjoy now will be destroyed.

I came here to enjoy my retirement and find some peace after 4 bereavements including my son and my husband, and I now find myself thinking of selling up and leaving. It is very distressing.  
I shall of course inform all my neighbours and firmly oppose such a plan.  
I have read your Pre Submission and Draft Staines Framework and realise that this proposed development is scheduled for 2028 - 2032.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Richard Wilkins (41906017)</b>
<b>Organisation:</b>

<b>Response ID: 1115676</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I would like to state I would like The Wickets play area to be designated a local green space . - it provides a play area for local children - somewhere for dogs to be walked - somewhere for residents to get together - somewhere for people to relax - a much needed peaceful green space - it needs to remain as is to keep the whole ambience of the wickets to be as it always has been

- I am surprised that the potential for the area to be sold off would be on the table at all  
- surely it is council property so they would have the say so on selling

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Teresa Wilkins (41906625)</b>	
<b>Organisation:</b>	
<b>Response ID: 1115703</b>	
<b>Policy / Evidence Base / Part of Plan: Policy E5: Open Space and Recreation</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
I am horrified to hear the little park on our estate could be developed into yet more housing in Ashford. I have happily watched the younger generation and my own children enjoy a small green space which is very well maintained and quite delightful and one of the reasons we moved here! A tranquil place to read a book, host a bonding community event or admire the well stocked and attractive borders. Green space and restful areas are becoming few and far between yet they are currently and rightfully being promoted as vital to our well being. We were promised this area would never be compromised but here we are contemplating such an event-surely not!	
<b>Question 6: You can upload any modifications below.</b>	
No Response	

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Maggie Williams (42037089)</b>
<b>Organisation: Persimmon Homes Thames Valley</b>

<b>Response ID: 1118047</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not effective
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
The Council are considered to have identified an incorrect Local Housing Need figure and as a result are planning for an insufficient amount of housing. The Plan is not sound as a result, due to its conflict with national policy in this respect. Criterion 1 of Policy ST2 states: 1) The housing requirement for Spelthorne is 618 dwellings per annum over the plan period (2022 – 2037), a total of 9,270. During the plan period, provision has been made for at least 9,270 new homes. Table 1 shows the contribution of all sources of housing supply. The Council selected their housing need figure on the basis of it simply being the minimum housing required by current planning guidance. However, it is clear in the guidance that this should be considered as a starting point and that the level of need should be informed by local conditions. The Council’s Strategic Housing Market Assessment was updated in 2019 and whilst out of date in terms of the housing figure for 603 dwellings per annum – (this figure has now been increased to 618 dwellings per annum) did identify identifies an acute shortage of affordable housing stating: “Using the traditional method, the analysis suggests a net need for 459 affordable homes per annum to be provided over the period to 2035. This figure is higher than previously estimated in the 2015 SHMA although these are not on a like for like basis. However, such is the extent of affordable housing need in relation to overall need the Council is justified in seeking to secure as much additional affordable housing as viably possible.” In addition the SHMAA also identified a shortage of accommodation for the elderly with the largest growth in

population being in the 65+ age group. The SHMAA refers to paragraph 62 of the NPPF which states that: “the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers<sup>27</sup>, people who rent their homes and people wishing to commission or build their own homes. “The SHMAA concludes that “It is clear from the NPPF and the PPG that the OAN derived from the Standard Method is to act as a minimum and there is ample scope, and indeed it is encouraged, for local authorities to provide housing in excess of this.” Paragraph 24 of the PPG states: “The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.” It is contended therefore that the Council has failed to take account of its evidence base when calculating a housing figure and therefore the Plan is not sound in this regard. Furthermore the Council has failed to understand the role of the Standard Method in identifying a minimum annual housing need figure, and not simply producing a housing need figure. Having regard to the acute shortfall in affordable housing and the need to provide homes for older people, it is unclear why the Council continue to use the Standard Method as a definitive, rather than a minimum, figure. Paragraph 2 of Policy ST2 states: 2) Economic growth in Spelthorne will be supported by maintaining and intensifying the use of the Borough’s employment floorspace offer. This will be done by; • safeguarding employment land, • provision of new land in line with needs identified through the most up to date evidence and • encouraging its innovative re-use in ways that better meet the needs of the market. Policy EC1 and of the Local Plan seeks to retain employment land however the Council have included a number of sites within their allocations that are currently in employment/commercial use which would be either lost to or partially lost to residential. The Strategic Development Strategy is inconsistent with significant elements of the Plan and must be considered unsound as a result.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

The Council are considered to have identified an incorrect Local Housing Need figure and as a result are planning for an insufficient amount of housing. The Plan is not sound as a result, due to its conflict with national policy in this respect. The policy needs to be amended to reflect provision being required for a greater number of homes over the plan period to address the affordable housing and older person’s housing shortages.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)



If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: It is considered that the Spatial Strategy is unsound and we would wish to robustly challenge this at the hearing sessions.

<b>Respondent: Maggie Williams</b> (42037089)
<b>Organisation:</b> Persimmon Homes Thames Valley

<b>Response ID:</b> 1122404
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Please provide summary of substantially large document as attached. This promotes site not allocated. 1.1 This Strategic Movement & Access Strategy (SMAS) has been prepared by Milestone Transport Planning (MTP) on behalf of Persimmon Homes Thames Valley (PHTV) in support of an emerging development proposal comprised of circa 236-units and associated open space / soft landscaping and car parking on land at Stratton Road in Sunbury-on-Thames, Surrey. 1.2 The site comprises a rectangular shaped parcel of land encompassing 7.74 hectares (2.56 hectares in blue line) of open, undeveloped land located to the south and west off Stratton Road within an established residential area in Sunbury-on-Thames. The proposed development comprises 236 residential units (Use Class C3), including 184 houses and 52 flats of mixed type, size and tenure. A proposed masterplan is attached at Appendix 1 of this report. 1.3 The purpose of this report is to examine the key transport planning and highways aspects of the emerging development proposal required in support of the site being allocated in Spelthorne Borough Council's (SBC's) new Local Plan. The SMAS highlights the site's positive attributes, specifically in regard to assessing:

- The site's location in context with the local area and highway network, most notably its accessibility by non-car modes and potential for future households and visitors to adopt sustainable travel patterns and behaviour for various journey purposes.
- The baseline operational and safety characteristics of the local highway network, through examining personal injury accident data from the 'Crashmap' website.
- A design for achieving access to the site in accordance with national, regional and local planning best practice guidance, most notably in respect of geometric design and visibility splay requirements.
- The proposed parking, and delivery / servicing arrangements in light of national and local planning policy best practice guidance.
- The multi-modal trip generating potential of the development proposals and associated impact on the local highway and transport networks over the course of a typical weekday and AM (08:00 – 09:00) and PM (17:00 – 18:00) peak hour periods.

## 2. Baseline Conditions

### Site Description and Context

2.1 The promoted site encompasses 7.74 hectares (2.56 hectares in blue line) of open, undeveloped land located within an established residential area in Sunbury-on-Thames, Surrey.

2.2 The site boundaries are formed by residential dwellings fronting Stratton Road and Layton's Lane to the north, east and north-west, Hawkedale Primary School and open land to the south and Spelthorne Gymnastics and Bishop Wand Church of England School to the west.

2.3 The surrounding area is predominantly residential in nature, with a number of schools / educational establishments within short walking distance. The location of the promoted site in context with the local area and surrounding highway and transport networks is indicated in Figure 1. (page 7).

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

Please provide summary of substantially large document as attached. This promotes site not allocated.

CSA Environmental has been appointed by Persimmon Homes Thames Valley to undertake a Landscape and Green Belt Overview of land at Stratton Road, Sunbury ('the Site'). The Site is located at the western edge of Sunbury on land which currently lies within the Green Belt.

1.2 The Site comprises two fields located to the east of Stratton Road. For ease of description the larger northern field is identified as Area A and the southern field Area B, as shown on the Aerial Photograph in Appendix B.

1.3 The Site is being promoted for residential development through Spelthorne Council's emerging Local Plan. CSA originally prepared a Landscape and Green Belt Overview as part of the information submitted during the 'Call for Sites' consultation undertaken in 2016. This report has been updated to reflect the current National / local policy situation and any new landscape / Green Belt evidence which has been produced by the Council.

1.4 The Council are currently consulting on the Preferred Options Local Plan. This plan identifies Area A as a Preferred Site Allocation for approximately 230 – 260 new homes.

1.5 This report provides an assessment of the Site's suitability to accommodate housing in landscape and visual terms. In addition it considers the Site's suitability for release from the Green Belt against the objectives of National Green Belt Policy.

1.6 The Site comprises two parts; a large field to the north which is subdivided into paddocks for horse grazing (Area A); and a smaller field of rough grassland / pasture (Area B). The location of these areas is shown on the Aerial Photograph in Appendix B.

#### Methodology

1.7 This overview is based on a site visit undertaken by suitably qualified and experienced Landscape Architect in December 2016. The Site was not re-visited as part of the update to this document; however it is assumed that the baseline situation has not materially altered in the interim. The weather conditions at the time of the site visit were slightly overcast but visibility was good in near and middle distance views.

1.8 In landscape and visual impact appraisal, a distinction is drawn between landscape effects (i.e. effects on the character or quality of the landscape irrespective of whether there are any views of the landscape, or viewers to see them) and visual effects (i.e. effects on people's views of the landscape from residential properties, from public rights of way and other areas with general public access). This report therefore considers the potential impact of the development on both landscape character and visibility. The methodology utilised in this report is contained in Appendix F.

1.9 Photographs contained within this document (Appendix C) were taken using a digital camera with a lens focal length approximating to 50mm, to give a similar depth of vision to the human eye. In some instances images have been combined to create a panorama.

#### 3.0 SITE CONTEXT

3.1 The Site lies at the western edge of the settlement at Sunbury. It is bordered by housing at Stratton Road to the north and east. To the west are the buildings and grounds at Bishop Ward Church of England School. To the south are the pitches associated with London Irish Rugby Football Club's training facility at the Hazelwood Centre, beyond which is an area of farmland and housing at Halliford Road. The Site Location is illustrated on the plan in Appendix A and on the Aerial Photograph in Appendix B.

3.2 The residential area to the north and east of the Site is characterised by post war suburban housing.

3.3 To the south east are Hawkedale Infant School and the grounds of the Royal Airforce Air Cadets – Sunbury Squadron. Beyond this lies the Hazelwood Centre which comprises a training facility and car parking, an artificial turf pitch and an extensive area of grassed rugby pitches.

3.4 School Walk extends alongside the southern edge of the pitches separated by a mature hedgerow. South of this are an area of farmland, a large attenuation basin, and the buildings and grounds at Vicarage Farm. This relatively open land extends to meet the residential area at Halliford Road. The treed grounds at Sunbury Cemetery, which includes a number of parkland exotic trees is conspicuous within the landscape.

3.5 To the west of the Site is Bishop Ward School which comprises several large institutional buildings, including a large, recently completed singular building in the south eastern corner of the School site. West of school is the woodland and open space at Upper Halliford Park. To the south west of the Site are Sivyers Lake and the park homes at Grange Farm Estate.

3.6 The wider landscape is characterised by significant urban / sub-urban development and infrastructure at the south western fringes of London. The built up areas are interspersed with pockets of farmland, informal and formal open space and by numerous waterbodies, including

several significant reservoirs.

**Question 6:** You can upload any modifications below.

Williams, Maggie - Persimmon Homes Thames Valley.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/598241/PDF/-/Williams%5F%20Maggie%20%2D%20Persimmon%20Homes%20Thames%20Valley%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Maggie Williams</b> (42037089)
<b>Organisation:</b> Persimmon Homes Thames Valley

**Response ID:** 1125650

**Policy / Evidence Base / Part of Plan:** Policy ST2: Planning for the Borough

**Question 1:** Do you consider this part of the Pre-Submission Spelthorne Local Plan to be **legally compliant**?

Yes/No/Not answered: No Response	<p>Additional Comments: Paragraph 2.12 sets out the objectives for delivering new homes:</p> <ul style="list-style-type: none"> <li>➤ Allocating sites to meet our identified housing need.</li> <li>➤ Implementing policies which provide a mix of homes for all members of our community.</li> <li>➤ Working with colleagues and partners to pr</li> </ul>
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**Question 2:** Do you consider this part of the Pre-Submission Spelthorne Local Plan to be **sound**?

Yes/No/Not answered: No Response	<p>Additional Comments: Not effective. No. Refers to: Objectives. Paragraphs: 2.12 and 2.13</p>
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**Question 3:** Do you consider this part of the Pre-Submission Spelthorne Local Plan **complies with the Duty to co-operate**?

Yes/No/Not answered: No Response	Additional Comments: No Response
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**Question 3a:** If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.

Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response

**Question 4:** Please give details of why you consider the Local Plan is **not legally compliant** or is **unsound** or **fails to comply with the duty to co-operate**. Please be as precise as possible.

If you wish to **support** the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:

No Response

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

The proposed site allocations and in particular small sites will not sufficient housing delivery and particularly affordable housing. The proposed allocations of commercial land for housing would result in the loss of employment land. As such these objectives are inconsistent with significant elements of the Plan and must be considered unsound as a result.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: I wish to participate in hearing session(s): Yes. We would wish to robustly challenge the way in which the assessment of sites for allocation in the Local Plan has been carried out at the hearing sessions.

<b>Respondent: Maggie Williams (42037089)</b>
<b>Organisation: Persimmon Homes Thames Valley</b>

<b>Response ID: 1125970</b>
<b>Policy / Evidence Base / Part of Plan: Policy ST2: Planning for the Borough</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
<p>Paragraph 5.18 refers to the Green Belt Assessment that was undertaken as part of the evidence base to inform the Local Plan in compliance with paragraph 140 on the NPPF which states that Belt boundaries “should only be altered where exceptional circumstances are fully evidenced through the preparation of or updating of plans”.</p> <p>It is clear from the evidence base that there has been considerable debate regarding whether the Council should plan to meet its housing need in full and this is referred to in paragraph 2.5 of the Council’s Topic Paper Background to Strategy and case for Exceptional Circumstances to amend Green Belt boundaries, but in order to meet their housing targets land would need to be released from the Green Belt. This has been supported by Persimmon’s in our earlier representations.</p> <p>However it is considered that the Council’s approach to the Green Belt releases has been inconsistent and therefore the proposed site allocations policy is not sound. The Council published an Officer site assessment document in November 2019 which included site reference HS1/010 - Land to the South and West of Stratton Road, Sunbury (owned by Persimmon) and concluded:</p>



“The site does however form part of the Borough’s open landscape and is greenfield but is recommended for further consideration with sub area 32- n as they play a lesser role than the Local Area, as set out in the Green Belt Assessment. There is deemed to be no harm to the integrity or performance of the wider Green Belt.”

The site with support from Persimmon was subsequently included as one of the Preferred Site Allocations in the Preferred Options consultation which took place between November 2019 and January 2020. Persimmons responded to this consultation supporting the inclusion of this site as an allocation confirming the site’s availability and evidence was submitted to demonstrate the site’s suitability and illustrative plans to show the level of development that could be accommodated on the site. This information is appended.

Site HS1/010 has now been excluded from the Submission draft Local Plan subject of this Regulation 19 consultation, a decision which is inconsistent with the Council’s overall approach and is not supported by evidence. The Officer’s Site Assessments – Discounted Alternative Allocation Sites concluded: In terms of Green Belt performance, the site is identified as an area for further consideration in combination with a parcel to the north west. The sub-area that the site is located within has a strong sense of containment with strong perceptual and visual connections to the adjacent settlement edge and has limited visual links with the wider countryside to the south, therefore there would be little impact upon the visual openness and rurality of neighbouring sub-areas 32-e and 32-n.

Comment: This concludes that the site does not make a significant impact on the openness of the Green Belt and as such its removal from the Local Plan is inconsistent with the Council’s own evidence base.

The site is not subject to any major constraints, although it is an area for minerals safeguarding. The SA shows that the site would deliver a substantial number of new homes and would provide the opportunity to meet a mix of community needs. The site would however not result in the efficient use of land as it is greenfield therefore environmental impacts are largely negative.

Comment: This is equally true of all the Green Belt sites that are proposed to be allocated and therefore such a concern provides no justification for the removal of site HS01/010 as an allocation within the Local Plan.

Although the site contributes to the spatial strategy to a certain degree, it is at odds with some of the site selection criteria in that it is a larger site when compared to other available options, which may not aid distribution of development across the borough. It also received largely negative feedback at the Preferred Options stage. In weighing up whether to take this site forward, the potential housing provision in this location against the reception of the site in the community and impacts on the wider area need to be weighed against one another.

Comment: The site could accommodate up to 260 dwellings as demonstrated on the Concept Plan appended to the representations. The report prepared by GL Hearn Planning for Housing Delivery (August 2022) which forms part of the Council’s evidence base identified two areas of risk “

- Development Risk - Failing to meet housing need across the plan period and specifically for the first five years. This can result in planning applications being determined based on the presumption in favour of sustainable development (National Planning Policy Framework para 11d));
- Policy Risk - Failing to deliver the range of tenures, types and sizes of home in the right location required to provide a housing mix to address emerging policies.”

The report goes on to state (paragraph 1.9) that even if the Council can identify a 5 year housing land supply the land supply beyond the first 5 years is weaker. It is considered that the findings of this report which forms part of the Council's evidence base suggests that insufficient land has been allocated to meet the Council's housing targets over the plan period as demonstrated by.... This supports the inclusion of Site HS1/010 as an allocation in the Local Plan to address the land shortfall. The site has the added benefits of being a larger site in a sustainable location and as such would provide a range of tenures and types of homes for which there is an identified need highlighted in the SHMAA.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

The Council has not justified the exclusion of Site HS1/010 from the local Plan and there is no material change in circumstances as to why the site has now been omitted. The Council's evidence base suggests that insufficient land has been allocated in the Plan to accommodate the Council's housing target. Site

HS1/010 should therefore be reinstated as an allocation in the Local Plan.

**Question 6:** You can upload any modifications below.

Williams\_ Maggie - SP4 Appendix 1.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/607560/PDF/-/Williams%5F%20Maggie%20%2D%20SP4%20Appendix%201%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: It is considered that the Green Belt Assessment has been inconsistently applied and the exclusion of site HS1/01 as an allocation is unsound and we would wish to robustly challenge this at the hearing sessions.

<b>Respondent: Maggie Williams (42037089)</b>	
<b>Organisation:</b> Persimmon Homes Thames Valley	
<b>Response ID:</b> 1118049	
<b>Policy / Evidence Base / Part of Plan:</b> Policy H1: Homes for All	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not effective	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>Policy H1 states that provision will be made for 618 dwellings per annum over the Plan period. Although this figure has been derived using the Government's Standard Methodology it is considered to be insufficient to meet the housing need having regard to lack of housing delivery over recent years and the inability to demonstrate a 5 year housing land supply.</p> <p>Attached to this form is a representation prepared on behalf of Persimmon Homes by Pegasus Group setting out the reason why the Plan is unsound in this regard.</p> <p>Please refer to paragraphs 1.17 – 1.20 of the appended representation by Pegasus Group.</p>	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
Further work should be undertaken to revise the housing target in order meet the Borough's requirements in terms of affordable and specialist needs housing.	
<b>Question 6:</b> You can upload any modifications below.	

Policy H1 Appendix 1.pdf

<https://spelthorne.inconsult.uk/gf2.ti/a/1409506/587220/PDF/-/Policy%20H1%20Appendix%201%2Epdf>

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: It is considered that the housing target is unsound and we would wish to robustly challenge this at the hearing sessions.

<b>Respondent: Maggie Williams (42037089)</b>
<b>Organisation: Persimmon Homes Thames Valley</b>

<b>Response ID: 1118052</b>
<b>Policy / Evidence Base / Part of Plan: HS1/009 (Bugle Nurseries, Upper Halliford Road)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not Justified, Not Effective, Not Consistent with National Policy - were also selected. The Draft Local Plan Officer Site Assessments – Draft Local Plan Allocations has assessed site HS1/009 (Bugle Nurseries, 171 Upper Halliford Road, Shepperton and found it to be suitable for proposed allocation of up to 79 residential units. The sustainability appraisal of this site provides scores on 12 different objectives. By comparison Site HS1/010 was assessed in the same manner and deemed not suitable enough to be proposed for allocation. Reasons for which are detailed within the Local Plan Officer Site Assessments – Discounted Alternative Allocation Sites. For the reasons set out below, it is considered that site HS1/010 is comparable if not better performing than site HS1/009, and as such there is no justification for the allocation for the latter ahead of the former. For Objective 1 (To provide sufficient high quality housing to enable people to live in a home suitable to their needs and which they can afford) HS1/009 receives a score of ‘+’ (green), a positive assessment as it could contribute 70 units to housing need. In comparison, for Objective 1 site HS1/010 (Land to the South and West of Stratton Road, Sunbury) of the Officer Site Assessments – Discounted Alternative Allocation Sites which has not been brought

forward for proposed allocation receives a score of ‘++’ (green), a higher score than HS1/009, as the site can contribute up to 260 homes and include affordable housing provision. With respect to the first and one of the key objectives, the discounted site performs better.

For Objective 2 (To facilitate the improved health and well-being of the whole population and reduce inequalities.) HS1/009 receives a score of ‘+’ (green) as ‘The proposed development seeks to provide an open space on the northern/rear part of the site thus improving health and wellbeing’.

In comparison, for Objective 2, site HS1/010 receives a lesser score of 0 (yellow), which is the context of the Site Assessment appears to be neutral. This is for reasons such as a GP being within 10 minute walk, the opportunity for small scale on site green space, Cedars Recreational Ground being less than 400m walk, limited local service provision within the wider area which reduces promotion of public transport use, development being unlikely to tackle existing deprivation although integration of market and affordable housing could reduce inequalities and the site is not large enough to support infrastructure improvements that would enhance health and wellbeing.

It seems that site HS1/010 has been scrutinised to a much greater degree than HS1/009 and as a result has received a lower score, contribution to its omission. ‘Seeking to provide an open space’ is not a strong enough reason for a site to be given a positive assessment for health and well-being and contribute to its allocation status.

For Objective 4 (To reduce land contamination and protect soil quality and quantity) HS1/009 receives a score of 0 (yellow). The justification for this is that ‘The site is partly used for waste processes and initial site investigations shows parts of the site are contaminated’. For development of this site to happen, remediation would have to be carried out.

In comparison, for Objective 4, site HS1/010 receives a score of ‘-’ (red), which is the context of the Site Assessment appears to be negative. The justification for this is that ‘the site could potentially be grade 2 agricultural land which is the best and most versatile so further investigation required.’ The justification continues ‘No formal recorded uses for this land that could give rise to contamination but it is adjacent to the historic Vicarage Farm Landfill site and elevated levels of ground gases could be present.’

The lower scoring of site HS1/010 is not justified. I fail to see how a site with evidence of contamination could be considered preferable for housing than a site with no historical uses that would pertain to contamination and the ‘potential’ that it could be Grade 2 agricultural land, with no evidence to suggest so. Further to this the urban location and size of the site is wholly unsuitable for any arable use to which Grade 2 classification would be beneficial.

For Objective 9 (To promote sustainable modes of travel, improve accessibility to public transport and reduce road congestion) HS1/009 receives a score of 0 (yellow). The justification being ‘The development of the site is likely to increase car use but the proposed pedestrian crossing improvements would result in a positive impact.’

In comparison, for Objective 9, site HS1/010 receives a score of ‘-’ (red). The justification for this is that ‘There are no local services within the immediate vicinity of the site therefore car use is likely to increase. Bus stops are present more than 400m walk with a school and park in walking distance. Services in Sunbury less than 30 minute walk’

I do not believe it is at all justifiable to give site HS1/009 a higher score for this objective solely based on the fact that there is a proposed pedestrian crossing; there does not appear to have been adequate scrutiny for this site compared with HS1/010 where there has been measures of distances to services. Needing to provide additional infrastructure in the form of pedestrian crossing improvements is in itself unsustainable. Both sites appear similar distances to amenities, arguable site HS1/010 has better access to amenities and services due to its location closer to Sunbury-on-Thames town centre. Vitally, site HS1/010 is closer to both local train stations (Upper Halliford and Sunbury) – accessibility to public transport is the cornerstone of the Objective. Site HS1/010 is also significantly closer to Cedars Recreational Ground. Furthermore, when assessed in terms of ‘Contribution to the Strategy: Green Belt Criterion’ site HS1/010 receives a relatively high score of 3 as ‘The site is considered to be reasonably sustainably located as it is at the edge of the urban area and local services are generally within the preferred maximum walking distance.’ This does not reflect the score given in the sustainability appraisal and therefore does not seem like an effective assessment.

For Objective 10 (Maintain high levels of employment and economic growth which is inclusive and sustainable across the Borough) site HS1/009 scores 0 (yellow) as existing employment on the site will be lost. HS1/010 has a better score of ‘+’ (green), owing to the query as to why it has been discounted. For Objective 11 (To promote the efficient use of resources, to reduce greenhouse gas emissions and move to a low carbon economy), HS1/009 scores 0 (yellow). The justification is ‘Development could allow for energy efficient systems to be installed to mitigate the impact of development. There is likely to be a reduction in large vehicles using the site in the long term which would benefit the local environment. Development of the site is likely to increase emissions of greenhouse gases as a result of the impacts of construction and occupation and subsequent car use.’

In comparison HS1/010 has a lesser score of ‘-’ (red). The justification for this is ‘Current use has little/no impact on resources, emissions or carbon use, although could be mitigated through sustainable construction. The site is of significant size and development to the level proposed would likely bring about a notable amount of resource use, particularly in the long term compared to the existing. The size of development is considered to result in negative impacts overall. Emissions likely to increase across the borough without appropriate mitigation.’

I do not deem it justifiable to view HS1/010 negatively in terms of Objective 11 based on the size of the site. A larger site will undeniably create more emissions and increased resource use but it will also provide more homes in a single location. This is more efficient than multiple smaller sites spread around. I do not think the size of a site should come into the assessment as the negative impacts are always going to be relative to the sites size – smaller site means fewer emissions but fewer homes. To reiterate the point that site size is not a valid criterion, paragraph 73 of the NPPF states ‘The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns’

All other objectives of the sustainability appraisal received the same score across the two sites.

Sites of the Local Plan have also been assessed based on ‘Contribution to the Strategy: Green Belt Criterion’. In terms of Green Belt performance, the discounted HS1/010 has a much better score than the approved HS1/009 site, suggesting that it is more suitable for release from the Green Belt.

HS1/010 is considered ‘weakly performing Green Belt’; this raises questions of its omission from allocation. ‘Smaller site’ is another one of the criteria in this part of the assessment, as aforementioned judging a site as better for no reason other than it being small is not a viable form of assessment.

With regard to 'Contribution to the deliverability of the strategy, both sites receive the same score, despite the subsequent omission of one and allocation of another.  
For the reasons set out above, it is considered that site HS1/010 is more suitable for Green Belt release and housing allocation than site HS1/009, which is proposed to be allocated within the Local Plan.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

It is my opinion that the Local Plan is not sound with regard to the assessment of site in contention for allocation. As described above it appears that there are examples of sites that have been promoted for proposed allocation that do not perform as well as the omitted site HS1/010, and there are inconsistencies in the Council's assessments of individual sites.  
For these reasons I would propose the modification of including site HS1/010 (Land to the South and West of Stratton Road, Sunbury) in the Officer Site Assessments – Draft Local Plan Allocations. As has been demonstrated elsewhere in our representations the Council requires additional sites, and the allocation of HS1/010, as was previously proposed, would assist with this.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: We would wish to robustly challenge the way in which the assessment of sites for allocation in the Local Plan has been carried out at the hearing sessions.



<b>Respondent: Maggie Williams (42037089)</b>
<b>Organisation: Persimmon Homes Thames Valley</b>

<b>Response ID: 1118053</b>
<b>Policy / Evidence Base / Part of Plan: HS1/012 (Land East of Upper Halliford, Nursery Road)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be legally compliant?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be sound?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan complies with the Duty to co-operate?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
<p>Not Effective, Not Consistent with National Policy - were also selected.</p> <p>The Draft Local Plan Officer Site Assessments – Draft Local Plan Allocations has assessed site HS1/012 (Land East of Upper Halliford Road, Nursery Road, Sunbury and found it to be suitable for proposed allocation of residential units. The sustainability appraisal of this site provides scores on 12 different objectives.</p> <p>By comparison Site HS1/010 (Land to the South and West of Stratton Road, Sunbury) was assessed in the same manner and deemed not suitable enough to be proposed for allocation. Reasons for which are within the Local Plan Officer Site Assessments – Discounted Alternative Allocation Sites.</p> <p>For the reasons set out below, it is considered that site HS1/010 is comparable if not better performing than site HS1/012, and as such there is no justification for the allocation for the latter ahead of the former.</p> <p>For Objective 1 (To provide sufficient high quality housing to enable people to live in a home suitable to their needs and which they can afford) HS1/012 receives a score of ‘+’ (green), a positive assessment; the reason being ‘Housing scheme promoted’.</p>

In comparison, for Objective 1 site HS1/010 receives a score of ‘++’ (green), a higher score than HS1/012, as the site can contribute up to 260 homes and include affordable housing provision. With respect to the first and one of the key objectives, the discounted site performs better.

For Objective 9 (To promote sustainable modes of travel, improve accessibility to public transport and reduce road congestion) HS1/012 receives a score of ‘+’ (green). The justification being ‘Reasonably sustainable site in proximity to local services and public transport although the frequency of bus services could be improved’

In comparison, for Objective 9, site HS1/010 receives a score of ‘-’ (red). The justification for this is that ‘There are no local services within the immediate vicinity of the site therefore car use is likely to increase. Bus stops are present more than 400m walk with a school and park in walking distance. Services in Sunbury less than 30 minute walk’

I do not believe it is justifiable to give site HS1/012 a higher score; there does not appear to have been adequate scrutiny for this site compared with HS1/010 where there has been measures of distances to services. Despite bus stops, school, a park and services in Sunbury quite quoted as within reasonable distances HS1/010 still receives a negative score, whereas the vaguely described ‘reasonably sustainable site in proximity to local services and transport’ of HS1/012 has received a positive score. Both sites appear similar distances to amenities, arguable site HS1/010 has better access to amenities and services due to its location closer to Sunbury-on-Thames town centre. Site HS1/010 is closer to the larger local train station (Sunbury) and closer to Cedars Recreational Ground. Furthermore, when assessed in terms of ‘Contribution to the Strategy: Green Belt Criterion’ site HS1/010 receives a relatively high score of 3 as ‘The site is considered to be reasonably sustainably located as it is at the edge of the urban area and local services are generally within the preferred maximum walking distance.’ This does not reflect the score given in the sustainability appraisal and therefore does not seem like an effective assessment.

For Objective 11 (To promote the efficient use of resources, to reduce greenhouse gas emissions and move to a low carbon economy), HS1/012 scores 0 (yellow). The justification is ‘The development of the site could provide an opportunity to incorporate renewable or low-carbon energy sources however this would be on a small scale and would be balanced by the likely increase in air pollution locally.’

In comparison HS/010 has a lesser score of ‘-’ (red). The justification for this is ‘Current use has little/no impact on resources, emissions or carbon use, although could be mitigated through sustainable construction. The site is of significant size and development to the level proposed would likely bring about a notable amount of resource use, particularly in the long term compared to the existing. The size of development is considered to result in negative impacts overall. Emissions likely to increase across the borough without appropriate mitigation.’

It appears that site HS1/010 has been assessed in a harsher manner than HS1/012, and in some respect has been assessed differently altogether. HS1/012 has received a higher score as ‘the development of the site could provide an opportunity to incorporate renewable or low carbon energy sources’. By this logic site HS1/010 could also provide an opportunity to incorporate renewable or low carbon energy sources – this could be said of any site and so does not really imply a sound level of assessment.

Furthermore I do not deem it justifiable to view HS1/010 negatively in terms of Objective 11 based on the size of the site. A larger site will undeniably create more emissions and increased resource use but it will also provide more homes in a single location. This is more efficient than multiple smaller

sites spread around. I do not think the size of a site should come into the assessment as the negative impacts are always going to be relative to the sites size – smaller site means fewer emissions but fewer homes. Site HS1/012 has been given a higher score due to its potential to provide renewable or low carbon energy, by this logic the larger site has a higher potential in this regard and should receive a higher score.

To reiterate the point that site size is not a valid criterion, paragraph 73 of the NPPF states ‘The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns’ All other objectives of the sustainability appraisal received the same score across the two sites.

Sites of the Local Plan have also been assessed based on ‘Contribution to the Strategy: Green Belt Criterion’. ‘Smaller site’ is one of the criteria in this part of the assessment, as aforementioned judging a site as better for no reason other than is being small is not a viable form of assessment.

With regard to ‘Contribution to the deliverability of the strategy, both sites receive the same score, despite the subsequent omission of one and allocation of another.

Finally, the plan contained within the policy shows a highly constrained access which is unlikely to be suitable for a 60-unit scheme. If safe and suitable access cannot be provided, then it is inappropriate to allocate the site for residential development. By way of comparison, site HS1/010 has many opportunities for access.

For the reasons set out above, it is considered that site HS1/010 is more suitable for Green Belt release and housing allocation than site HS1/012, which is proposed to be allocated within the Local Plan.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

It is my opinion that the Local Plan is not sound with regard to the assessment of site in contention for allocation. As described above it appears that there are examples of sites that have been promoted for proposed allocation that do not perform as well as the omitted site HS1/010, and there are inconsistencies in the Council’s assessments of individual sites.

For these reasons I would propose the modification of including site HS1/010 (Land to the South and West of Stratton Road, Sunbury) in the Officer Site Assessments – Draft Local Plan Allocations. As has been demonstrated elsewhere in our representations the Council requires additional sites, and the allocation of HS1/010, as was previously proposed, would assist with this.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: We would wish to robustly challenge the way in which the assessment of sites for allocation in the Local Plan has been carried out at the hearing sessions.

<b>Respondent: Maggie Williams (42037089)</b>	
<b>Organisation:</b> Persimmon Homes Thames Valley	
<b>Response ID:</b> 1118056	
<b>Policy / Evidence Base / Part of Plan:</b> SN1/006 (Land to west of Long Lane and south of Blackburn Trading Estate)	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
<p>Not Effective, Not Consistent with National Policy - were also selected</p> <p>The Draft Local Plan Officer Site Assessments – Draft Local Plan Allocations has assessed site SN1/006 (Land to west of Long Lane and south of Blackburn Trading Estate, Stanwell) and found it to be suitable for proposed allocation of residential units. The sustainability appraisal of this site provides scores on 12 different objectives.</p> <p>By comparison Site HS1/010 (Land to the South and West of Stratton Road, Sunbury) was assessed in the same manner and deemed not suitable enough to be proposed for allocation. Reasons for which are within the Local Plan Officer Site Assessments – Discounted Alternative Allocation Sites.</p> <p>For the reasons set out below, it is considered that site HS1/010 is comparable if not better performing than site SN1/006, and as such there is no justification for the allocation for the latter ahead of the former. In the case of these 2 sites there is only a single sustainability objective in which the allocated site has a higher score – Objective 11 (To provide sufficient high quality housing to enable people to live in a home suitable to their needs and which they can afford) and I believe this to be debatable as discussed below.</p>	

For Objective 11 (To promote the efficient use of resources, to reduce greenhouse gas emissions and move to a low carbon economy), SN1/006 scores 0 (yellow). The justification is 'The current use does not have an impact on resources, emissions or carbon use and redevelopment would likely increase resource use. Impacts could potentially be mitigated through sustainable construction. The site could potentially incorporate renewable and low carbon energy.'

In comparison HS/010 has a lesser score of '-' (red). The justification for this is 'Current use has little/no impact on resources, emissions or carbon use, although could be mitigated through sustainable construction. The site is of significant size and development to the level proposed would likely bring about a notable amount of resource use, particularly in the long term compared to the existing. The size of development is considered to result in negative impacts overall. Emissions likely to increase across the borough without appropriate mitigation.'

It appears that site HS1/010 has been assessed in a harsher manner than SN1/006, and in some respect has been assessed differently altogether. SN1/006 has received a higher score as 'The site could potentially incorporate renewable and low carbon energy. By this logic site HS1/010 could also provide an opportunity to incorporate renewable or low carbon energy sources – this could be said of any site and so does not really imply a sound level of assessment.

Furthermore I do not deem it justifiable to view HS1/010 negatively in terms of Objective 11 based on the size of the site. A larger site will undeniably create more emissions and increased resource use but it will also provide more homes in a single location. This is more efficient than multiple smaller sites spread around. I do not think the size of a site should come into the assessment as the negative impacts are always going to be relative to the sites size – smaller site means fewer emissions but fewer homes. Site SN1/006 has been given a higher score due to its potential to provide renewable or low carbon energy, by this logic the larger site has a higher potential in this regard and should receive a higher score.

To reiterate the point that site size is not a valid criterion, paragraph 73 of the NPPF states 'The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns'

All other objectives of the sustainability appraisal received the same score across the two sites.

Sites of the Local Plan have also been assessed based on 'Contribution to the Strategy: Green Belt Criterion' 'Smaller site' is one of the criteria in this part of the assessment, as aforementioned judging a site as better for no reason other than is being small is not a viable form of assessment.

With regard to 'Contribution to the deliverability of the strategy – spatial strategy', both sites receive the same score, and HS1/010 receives a higher score for sustainability of location', despite the subsequent omission of one and allocation of the other.

For the reasons set out above, it is considered that siter HS1/010 is more suitable for Green Belt release and housing allocation than site SN1/006, which is proposed to be allocated within the Local Plan.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

It is my opinion that the Local Plan is not sound with regard to the assessment of site in contention for allocation. As described above it appears that there are examples of sites that have been promoted for proposed allocation that do not perform as well as the omitted site HS1/010, and there are inconsistencies in the Council's assessments of individual sites.

For these reasons I would propose the modification of including site HS1/010 (Land to the South and West of Stratton Road, Sunbury) in the Officer Site Assessments – Draft Local Plan Allocations. As has been demonstrated elsewhere in our representations the Council requires additional sites, and the allocation of HS1/010, as was previously proposed, would assist with this.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: We would wish to robustly challenge the way in which the assessment of sites for allocation in the Local Plan has been carried out at the hearing sessions.

<b>Respondent: Maggie Williams (42037089)</b>
<b>Organisation: Persimmon Homes Thames Valley</b>

<b>Response ID: 1118054</b>
<b>Policy / Evidence Base / Part of Plan: HS1/012b (Land East of Upper Halliford Road)</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be legally compliant?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be sound?</b>
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan complies with the Duty to co-operate?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
<p>Not Effective, Not Consistent with National Policy - were also selected</p> <p>The Draft Local Plan Officer Site Assessments – Draft Local Plan Allocations has assessed site HS1/012b (Land East of Upper Halliford Road (site B)) and found it to be suitable for proposed allocation of residential units. The sustainability appraisal of this site provides scores on 12 different objectives. By comparison Site HS1/010 (Land to the South and West of Stratton Road, Sunbury) was assessed in the same manner and deemed not suitable enough to be proposed for allocation. Reasons for which are within the Local Plan Officer Site Assessments – Discounted Alternative Allocation Sites. For the reasons set out below, it is considered that site HS1/010 is comparable if not better performing than site HS1/012b, and as such there is no justification for the allocation for the latter ahead of the former.</p> <p>For Objective 1 (To provide sufficient high quality housing to enable people to live in a home suitable to their needs and which they can afford) HS1/012b receives a score of '+' (green), a positive assessment; the reason being 'Small housing development promoted alongside education use.'</p> <p>In comparison, for Objective 1 site HS1/010 receives a score of '++' (green), a higher score than HS1/012b, as the site can contribute up to 260 homes and include affordable housing provision. With respect to the first, and one of the key objectives, the discounted site performs better.</p>



For Objective 2 (To facilitate the improved health and well-being of the whole population and reduce inequalities) site HS1/012b receives score of '+' (green), the soundness of assessment could be questioned here as site HS1/012, which is literally adjacent, received a lower score. The justification of the score was that the 'Site is in a reasonably sustainable location close to some local services in and around Upper Halliford and Sunbury which could facilitate active lifestyles. Good access to bus routes to reduce reliance on the car, although services could be more frequent. Could increase links to Upper Halliford Park to the west. Access to education facilities likely to improve wellbeing and quality of life.'

In comparison to site HS1/010, which scored lower with 0 (yellow) the justifications seems at odds. The lower score was justified by a GP being within 10 minute walk, the opportunity for small scale on site green space, Cedars Recreational Ground being less than 400m walk, limited local service provision within the wider area which reduces promotion of public transport use, development being unlikely to tackle existing deprivation although integration of market and affordable housing could reduce inequalities and the site is not large enough to support infrastructure improvements that would enhance health and wellbeing.

It seems that site HS1/010 has been scrutinised to a much greater degree than HS1/012b and as a result has received a lower score, contribution to its omission. HS1/012b has been credited for having access to education facilities; HS1/010 has not received any such credit despite that fact that there are not 1, but 2 schools adjacent to its boundary.

For Objective 9 (To promote sustainable modes of travel, improve accessibility to public transport and reduce road congestion) HS1/012b receives a score of '+' (green). The justification being 'Reasonably sustainable site in proximity to local services and public transport although the frequency of bus services could be improved'

In comparison, for Objective 9, site HS1/010 receives a score of '-' (red). The justification for this is that 'There are no local services within the immediate vicinity of the site therefore car use is likely to increase. Bus stops are present more than 400m walk with a school and park in walking distance. Services in Sunbury less than 30 minute walk'

I do not believe it is justifiable to give site HS1/012b a higher score; there does not appear to have been adequate scrutiny for this site compared with HS1/010 where there has been measures of distances to services. Despite bus stops, school, a park and services in Sunbury quite quoted as within reasonable distances HS1/010 still receives a negative score, whereas the vaguely described 'reasonably sustainable site in proximity to local services and transport' of HS1/012b has received a positive score. Both sites appear similar distances to amenities, arguable site HS1/010 has better access to amenities and services due to its location closer to Sunbury-on-Thames town centre. Site HS1/010 is closer to the larger local train station (Sunbury) and closer to Cedars Recreational Ground. Furthermore, when assessed in terms of 'Contribution to the Strategy: Green Belt Criterion' site HS1/010 receives a relatively high score of 3 as 'The site is considered to be reasonably sustainably located as it is at the edge of the urban area and local services are generally within the preferred maximum walking distance.' This does not reflect the score given in the sustainability appraisal and therefore does not seem like an effective assessment.

For Objective 11 (To promote the efficient use of resources, to reduce greenhouse gas emissions and move to a low carbon economy), HS1/012b scores 0 (yellow). The justification is 'The development of the site could provide an opportunity to incorporate renewable or low-carbon energy sources however this would be on a small scale and would be balanced by the likely increase in air pollution locally.'

In comparison HS/010 has a lesser score of '-' (red). The justification for this is 'Current use has little/no impact on resources, emissions or carbon use, although could be mitigated through sustainable construction. The site is of significant size and development to the level proposed would likely bring about a notable amount of resource use, particularly in the long term compared to the existing. The size of development is considered to result in negative impacts overall. Emissions likely to increase across the borough without appropriate mitigation.'

It appears that site HS1/010 has been assessed in a harsher manner than HS1/012b, and in some respect has been assessed differently altogether. HS1/012 has received a higher score as 'the development of the site could provide an opportunity to incorporate renewable or low carbon energy sources'. By this logic site HS1/010 could also provide an opportunity to incorporate renewable or low carbon energy sources – this could be said of any site and so does not really imply a sound level of assessment.

Furthermore I do not deem it justifiable to view HS1/010 negatively in terms of Objective 11 based on the size of the site. A larger site will undeniably create more emissions and increased resource use but it will also provide more homes in a single location. This is more efficient than multiple smaller sites spread around. I do not think the size of a site should come into the assessment as the negative impacts are always going to be relative to the sites size – smaller site means fewer emissions but fewer homes. Site HS1/012b has been given a higher score due to its potential to provide renewable or low carbon energy, by this logic the larger site has a higher potential in this regard and should receive a higher score. T

o reiterate the point that site size is not a valid criterion, paragraph 73 of the NPPF states 'The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns'

All other objectives of the sustainability appraisal received the same score across the two sites.

Within this assessment there is also a score for 'Feedback from the preferred Options consultation'. HS1/010 receives the lowest score of 1 due to 'Largely negative feedback received through the consultation relating to the loss of a green area, impacts on the environment, traffic concerns and general infrastructure'. Site HS1/012b does not have a score for this metric as it was not considered through the preferred options consultation, as the public opinion of HS1/101 seems to be a major factor in its omission, this significant layer of assessment being used for some sites and not others doesn't display soundness.

Sites of the Local Plan have also been assessed based on 'Contribution to the Strategy: Green Belt Criterion'. In terms of Green Belt performance, the discounted HS1/010 has a much better score than the approved HS1/012b site. HS1/010 is considered 'weakly performing Green Belt'; this raises questions of its omission from allocation. 'Smaller site' is another one of the criteria in this part of the assessment, as aforementioned judging a site as better for no reason other than is being small is not a viable form of assessment.

With regard to 'Contribution to the deliverability of the strategy – spatial strategy', both sites receive the same score, despite the subsequent omission of one and allocation of another.

Finally, the plan contained within the policy shows a highly constrained access which is unlikely to be suitable for a 60-unit scheme. If safe and suitable access cannot be provided, then it is inappropriate to allocate the site for residential development. By way of comparison, site HS1/010 has many opportunities for access.

For the reasons set out above, it is considered that siter HS1/010 is more suitable for Green Belt release and housing allocation than site HS1/012B, which is proposed to be allocated within the Local Plan.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

It is my opinion that the Local Plan is not sound with regard to the assessment of site in contention for allocation. As described above it appears that there are examples of sites that have been promoted for proposed allocation that do not perform as well as the omitted site HS1/010, and there are inconsistencies in the Council's assessments of individual sites.

For these reasons I would propose the modification of including site HS1/010 (Land to the South and West of Stratton Road, Sunbury) in the Officer Site Assessments – Draft Local Plan Allocations. As has been demonstrated elsewhere in our representations the Council requires additional sites, and the allocation of HS1/010, as was previously proposed, would assist with this.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: We would wish to robustly challenge the way in which the assessment of sites for allocation in the Local Plan has been carried out at the hearing sessions.

<b>Respondent: Maggie Williams</b> (42037089)
<b>Organisation:</b> Persimmon Homes Thames Valley

<b>Response ID:</b> 1118055
<b>Policy / Evidence Base / Part of Plan:</b> SN1/005 (Land at Northumberland Close)
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: Not justified
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Not Effective, Not Consistent with National Policy - were also selected. The Draft Local Plan Officer Site Assessments – Draft Local Plan Allocations has assessed site SN1/005 (Land at Northumberland Close, Stanwell) and found it to be suitable for proposed allocation of residential units. The sustainability appraisal of this site provides scores on 12 different objectives. By comparison Site HS1/010 (Land to the South and West of Stratton Road, Sunbury) was assessed in the same manner and deemed not suitable enough to be proposed for allocation. Reasons for which are within the Local Plan Officer Site Assessments – Discounted Alternative Allocation Sites. For the reasons set out below, it is considered that site HS1/010 is comparable if not better performing than site SN1/005, and as such there is no justification for the allocation for the latter ahead of the former. For Objective 1 (To provide sufficient high quality housing to enable people to live in a home suitable to their needs and which they can afford) SN1/005 receives a score of ‘+’ (green), a positive assessment; the reason being ‘The site could accommodate a reasonable quantum of residential units and could provide affordable units..’ In comparison, for Objective 1 site HS1/010 receives a score of ‘++’ (green), a higher score than SN1/005, as the site can contribute up to 260 homes and include affordable housing provision. With respect to the first, and one of the key objectives, the discounted site performs better.

For Objective 9 (To promote sustainable modes of travel, improve accessibility to public transport and reduce road congestion) SN1/005 receives a score of 0 (yellow). The justification being 'Site located near bus routes on Clare Road but proposed use would increase need to travel more than existing use' In comparison, for Objective 9, site HS1/010 receives a score of '-' (red). The justification for this is that 'There are no local services within the immediate vicinity of the site therefore car use is likely to increase. Bus stops are present more than 400m walk with a school and park in walking distance. Services in Sunbury less than 30 minute walk'

I do not believe it is justifiable to give site SN1/005 a higher score; there does not appear to have been adequate scrutiny for this site compared with HS1/010 where there has been measures of distances to services. Despite bus stops, school, a park and services in Sunbury quite quoted as within reasonable distances HS1/010 still receives a negative score.

Both sites appear similar distances to amenities, arguably site HS1/010 has better access to amenities and services due to its location closer to Sunbury-on-Thames town centre. Site HS1/010 is closer to a local train station (Sunbury) and close to Cedars Recreational Ground.

Furthermore, when assessed in terms of 'Contribution to the Strategy: Green Belt Criterion' site HS1/010 receives a relatively high score of 3 as 'The site is considered to be reasonably sustainably located as it is at the edge of the urban area and local services are generally within the preferred maximum walking distance.' This does not reflect the score given in the sustainability appraisal and therefore does not seem like an effective assessment.

Additionally, SN1/005 receives a lower score of 2 in this metric.

For Objective 11 (To promote the efficient use of resources, to reduce greenhouse gas emissions and move to a low carbon economy), SN1/005 scores 0 (yellow). The justification is 'The current use does not have an impact on resources, emissions or carbon use and redevelopment would likely increase resource use. Impacts could potentially be mitigated through sustainable construction. The site could potentially incorporate renewable and low carbon energy.'

In comparison HS/010 has a lesser score of '-' (red). The justification for this is 'Current use has little/no impact on resources, emissions or carbon use, although could be mitigated through sustainable construction. The site is of significant size and development to the level proposed would likely bring about a notable amount of resource use, particularly in the long term compared to the existing. The size of development is considered to result in negative impacts overall. Emissions likely to increase across the borough without appropriate mitigation.'

It appears that site HS1/010 has been assessed in a harsher manner than SN1/005, and in some respect has been assessed differently altogether. SN1/005 has received a higher score as 'The site could potentially incorporate renewable and low carbon energy. By this logic site HS1/010 could also provide an opportunity to incorporate renewable or low carbon energy sources – this could be said of any site and so does not really imply a sound level of assessment.

Furthermore I do not deem it justifiable to view HS1/010 negatively in terms of Objective 11 based on the size of the site. A larger site will undeniably create more emissions and increased resource use but it will also provide more homes in a single location. This is more efficient than multiple smaller sites spread around. I do not think the size of a site should come into the assessment as the negative impacts are always going to be relative to the sites

size – smaller site means fewer emissions but fewer homes. Site SN1/005 has been given a higher score due to its potential to provide renewable or low carbon energy, by this logic the larger site has a higher potential in this regard and should receive a higher score.

To reiterate the point that site size is not a valid criterion, paragraph 73 of the NPPF states ‘The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns’

All other objectives of the sustainability appraisal received the same score across the two sites.

Sites of the Local Plan have also been assessed based on ‘Contribution to the Strategy: Green Belt Criterion’ ‘Smaller site’ is one of the criteria in this part of the assessment, as aforementioned judging a site as better for no reason other than is being small is not a viable form of assessment.

With regard to ‘Contribution to the deliverability of the strategy – spatial strategy’, both sites receive the same score, despite the subsequent omission of one and allocation of another.

For the reasons set out above, it is considered that siter HS1/010 is more suitable for Green Belt release and housing allocation than site SN1/005, which is proposed to be allocated within the Local Plan.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

It is my opinion that the Local Plan is not sound with regard to the assessment of site in contention for allocation. As described above it appears that there are examples of sites that have been promoted for proposed allocation that do not perform as well as the omitted site HS1/010, and there are inconsistencies in the Council’s assessments of individual sites.

For these reasons I would propose the modification of including site HS1/010 (Land to the South and West of Stratton Road, Sunbury) in the Officer Site Assessments – Draft Local Plan Allocations. As has been demonstrated elsewhere in our representations the Council requires additional sites, and the allocation of HS1/010, as was previously proposed, would assist with this.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: Yes, I wish to participate in hearing session(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: We would wish to robustly challenge the way in which the assessment of sites for allocation in the Local Plan has been carried out at the hearing sessions.

<b>Respondent: Jules Wilmhurst-Smith (19568129)</b>
<b>Organisation: NHS Surrey Heartlands (ICB)</b>

<b>Response ID: 1127123</b>
<b>Policy / Evidence Base / Part of Plan: Evidence base - IDP</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Emerging Policy ID1: Infrastructure and Delivery Our experience has shown that the provision of new purpose-built healthcare infrastructure to mitigate the impacts of development will require extensive capital funding. This means significant funding secured through S106 or CIL allocations for health should be anticipated over the Local Plan period. The ICB and Ashford and St. Peter's Hospitals NHS Foundation Trust encourage that the Council continue its engagement with NHS teams to identify opportunities to utilise CIL funding towards the delivery of new and expanded health facilities to support growth. The NHS, Council and other partners must collaborate to plan the infrastructure and necessary funding required to support the projected housing development and related population growth across the borough. A vital part of this is ensuring that the NHS has the resources required to develop additional healthcare infrastructure where necessary. The ICB and Ashford and St. Peter's Hospitals NHS Foundation Trust welcome continued

partnership working with the Council on the provision of infrastructure to support sustainable development in the borough. The updates to the Infrastructure Delivery Plan, and the capital allocation process for the Community Infrastructure Levy must support and result in funding allocations towards health care infrastructure in order to ensure the Council meets the objectives of the Local Plan as a whole.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Jules Wilmhurst-Smith (19568129)</b>
<b>Organisation: NHS Surrey Heartlands (ICB)</b>

<b>Response ID: 1122363</b>
<b>Policy / Evidence Base / Part of Plan: Policy SP1: Staines-upon-Thames</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Draft Staines Development Framework Emerging Policy SP1 Policy SP1 supports proposals that facilitate new and improved healthcare services. The ICB and Ashford and St. Peter’s Hospitals NHS Foundation Trust support this approach and welcomes further collaboration with the Council to implement strategies that align with the delivery of healthcare infrastructure in Staines. Objectives and Big Ideas In regards to the health priorities, the current proposals set out how the Council expects developments to contribute to healthy and active lifestyles, and the ICB and Ashford and St. Peter’s Hospitals NHS Foundation Trust support the overall vision set out within the draft framework which will help achieve this.
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>

No Response

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Jules Wilmhurst-Smith (19568129)</b>
<b>Organisation: NHS Surrey Heartlands (ICB)</b>

<b>Response ID: 1122354</b>
<b>Policy / Evidence Base / Part of Plan: Policy ID1: Infrastructure and Delivery</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Emerging Policy ID1: Infrastructure and Delivery Policy ID1 states that the council will work with infrastructure providers, developers and other key stakeholders to support the delivery of the infrastructure necessary to enable the development set out in the Local Plan. The council may also require the delivery of development to be phased to reflect the delivery of infrastructure. The policy also sets an expectation for developers to engage with the council and infrastructure providers, demonstrating they have explored existing infrastructure capacity, how this could be future proofed, and that they have made sufficient infrastructure provision. Development proposals which give rise to a need for infrastructure improvements will be expected to mitigate their impact, and planning permission will be granted subject to the provision or appropriate funding towards the level of infrastructure to support the development. This aligns with the National Planning Policy Framework 2021 which sets out that 'Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for infrastructure and community facilities (such as health).' The ICB and Ashford and St. Peter's Hospitals NHS Foundation Trust therefore support the overall approach to infrastructure delivery set out with Policy ID1 and welcomes that the

delivery of infrastructure could be supported through on-site provision or be funded off-site within or without Spelthorne through S106, S278 or other appropriate agreements, and the Community Infrastructure Levy (CIL).

Large residential developments often have very significant impacts in terms of the need for additional healthcare provision for future residents, meaning that a planning obligation requiring that the development delivers a new healthcare facility is often necessary. Furthermore, the significant cumulative impacts of smaller residential developments and their need for mitigation should also be recognised.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Jules Wilmhurst-Smith (19568129)</b>
<b>Organisation: NHS Surrey Heartlands (ICB)</b>

<b>Response ID: 1122361</b>
<b>Policy / Evidence Base / Part of Plan: Policy ID1: Infrastructure and Delivery</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
Emerging Policy ID1: Social and Community Facilities Reviews of the NHS estate are aimed at improving the provision of health care services by increasing efficiencies, including through the repurposing of unneeded and unsuitable buildings. This means that potential disposal of repurposed buildings, as well as the related revenue spending that is saved, can be used to improve NHS facilities and services. Flexibility should be accorded to NHS sites, or that of key infrastructure providers, in relation to the policies aimed at preventing the loss or change of use of social and community facilities and assets. Where such policies are overly restrictive, the repurposing of unneeded and unsuitable health care facilities may be prevented or delayed. Most surplus health care facilities are purpose-built and when at the end of their useful lives, are highly unlikely to be viable or, are suitable for other uses. An essential element of supporting the wider transformation of NHS services and the health estate is to ensure that surplus and vacant NHS sites are not strategically constrained by local planning policies, particularly for providing alternative uses. Therefore, where the NHS can demonstrate that healthcare facilities are no longer required for health, social or community purposes, there should be a presumption that such sites are suitable for other appropriate uses and should not be subject to restrictive policies or periods of marketing.

The ICB and Ashford and St. Peter's Hospitals NHS Foundation Trust recommend that the policy should set out exceptions and offers positive support for infrastructure providers through flexibility or a streamlined process to facilitate repurposing and reinvestment of capital towards modern and fit-for purpose infrastructure facilities. The loss of existing social and community infrastructure (including health) that forms part of a wider estate plan or land development scheme that will support health, social and community development should not be subject to any restrictions.

**Question 5:** Please set out the **modification(s)** you consider necessary to **make** the Pre-submission Spelthorne Local Plan **legally compliant** and **sound**, in respect of any legal compliance or soundness matters you have identified above.

No Response

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Jules Wilmhurst-Smith (19568129)</b>
<b>Organisation: NHS Surrey Heartlands (ICB)</b>

<b>Response ID: 1125945</b>
<b>Policy / Evidence Base / Part of Plan: Policy ID1: Infrastructure and Delivery</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Emerging Policy ID1: Infrastructure and Delivery Our experience has shown that the provision of new purpose-built healthcare infrastructure to mitigate the impacts of development will require extensive capital funding. This means significant funding secured through S106 or CIL allocations for health should be anticipated over the Local Plan period. The ICB and Ashford and St. Peter's Hospitals NHS Foundation Trust encourage that the Council continue its engagement with NHS teams to identify opportunities to utilise CIL funding towards the delivery of new and expanded health facilities to support growth. The NHS, Council and other partners must collaborate to plan the infrastructure and necessary funding required to support the projected housing development and related population growth across the borough. A vital part of this is ensuring that the NHS has the resources required to develop additional healthcare infrastructure where necessary. The ICB and Ashford and St. Peter's Hospitals NHS Foundation Trust welcome continued

partnership working with the Council on the provision of infrastructure to support sustainable development in the borough. The updates to the Infrastructure Delivery Plan, and the capital allocation process for the Community Infrastructure Levy must support and result in funding allocations towards health care infrastructure in order to ensure the Council meets the objectives of the Local Plan as a whole.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Jules Wilmhurst-Smith (19568129)</b>
<b>Organisation: NHS Surrey Heartlands (ICB)</b>

<b>Response ID: 1125946</b>
<b>Policy / Evidence Base / Part of Plan: Policy ID1: Infrastructure and Delivery</b>
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>
Emerging Policy ID1: Social and Community Facilities Reviews of the NHS estate are aimed at improving the provision of health care services by increasing efficiencies, including through the repurposing of unneeded and unsuitable buildings. This means that potential disposal of repurposed buildings, as well as the related revenue spending that is saved, can be used to improve NHS facilities and services. Flexibility should be accorded to NHS sites, or that of key infrastructure providers, in relation to the policies aimed at preventing the loss or change of use of social and community facilities and assets. Where such policies are overly restrictive, the repurposing of unneeded and unsuitable health care facilities may be prevented or delayed. Most surplus health care facilities are purpose-built and when at the end of their useful lives, are highly unlikely to be

viable or, are suitable for other uses. An essential element of supporting the wider transformation of NHS services and the health estate is to ensure that surplus and vacant NHS sites are not strategically constrained by local planning policies, particularly for providing alternative uses. Therefore, where the NHS can demonstrate that healthcare facilities are no longer required for health, social or community purposes, there should be a presumption that such sites are suitable for other appropriate uses and should not be subject to restrictive policies or periods of marketing. The ICB and Ashford and St. Peter's Hospitals NHS Foundation Trust recommend that the policy should set out exceptions and offers positive support for infrastructure providers through flexibility or a streamlined process to facilitate repurposing and reinvestment of capital towards modern and fit-for purpose infrastructure facilities. The loss of existing social and community infrastructure (including health) that forms part of a wider estate plan or land development scheme that will support health, social and community development should not be subject to any restrictions.

**Question 6:** You can upload any modifications below.

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**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Helen and Peter Winkworth (42118561)</b>
<b>Organisation:</b>

<b>Response ID: 1124638</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy PS1: Responding to the climate emergency
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
We are residents of Spelthorne and we strongly object to the proposals to build on the green belt and support the arguments made by the Spelthorne Save Green Belt Campaign. With reference to 15. RL1/011 (Land at Staines and Laleham Sports Club, Worple Road) (6.03 ha in total, 1.59 ha for residential use for 52 units (approx.) & sports facilities on remaining area). We live opposite this sports ground and this proposal is going to increase traffic, noise and pollution. Members and visitors regularly park their cars on the pavement and grass verge outside the sports ground which causes congestion and obstruction to road users and pedestrians. This proposal will make the current situation much worse.
<b>Question 6:</b> You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Helen and Peter Winkworth (42118561)</b>	
<b>Organisation:</b>	
<b>Response ID: 1119573</b>	
<b>Policy / Evidence Base / Part of Plan: RL1/011 (Land at Staines and Laleham Sports Club, Worple Road)</b>	
<b>Question 1: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2: Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3: Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b>?</b>	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a: If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.</b>	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4: Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b>. Please be as precise as possible.</b>	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5: Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b>, in respect of any legal compliance or soundness matters you have identified above.</b>	
<p>We are residents of Spelthorne and we strongly object to the proposals to build on the green belt and support the arguments made by the Spelthorne Save Green Belt Campaign.</p> <p>With reference to 15. RL1/011 (Land at Staines and Laleham Sports Club, Worple Road) (6.03 ha in total, 1.59 ha for residential use for 52 units (approx.) &amp; sports facilities on remaining area).</p> <p>We live opposite this sports ground and this proposal is going to increase traffic, noise and pollution. Members and visitors regularly park their cars on the pavement and grass verge outside the sports ground which causes congestion and obstruction to road users and pedestrians. This proposal will make the current situation much worse.</p>	
<b>Question 6: You can upload any modifications below.</b>	

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Ms Cathy Winmill (41229345)</b>
<b>Organisation:</b>

<b>Response ID: 1111830</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Local Green Space: Sunbury Common: Catherine Drive Hi, I'd like to put forward my support for the Catherine Drive green to be classified as a 'Local Green Space'. The green is directly visible from our front living room windows and is about 10 meters away from our property. If this land was developed in some way and the view obstructed, it would have detrimental impact on the value of our property as the view is a definite asset, and one that we thought would remain with the house when we bought it in 2020. The green is also widely used by the children in the street as a safe place to play, and as a place for residents to walk their dogs and to go for a stroll. Our two children have used this space to play football with other children from the street.
<b>Question 6:</b> You can upload any modifications below.
No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Mr Rob Winmill (41243617)</b>	
<b>Organisation:</b>	
<b>Response ID: 1111831</b>	
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation	
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?	
Yes/No/Not answered: No Response	Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.	
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response	
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.	
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:	
No Response	
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.	
<p>Local Green Space: Sunbury Common: Catherine Drive</p> <p>I am writing to you to confirm my support for the Catherine Drive green to be classified as a 'Local Green Space'.</p> <p>The green is a real asset to our community on Catherine Drive and was a key factor in our decision to move into Spelthorne in 2021.</p> <p>The green is visible from the windows at the front of our house, about 10 meters away from our property.</p> <p>The green is a safe place for children to be active and for residents to walk their dogs and to go for a stroll. Our own two children have used this space to play football with other children from the street. As someone with mobility issues it's invaluable having somewhere close by to walk, as I cannot drive or walk for more than about 10 minutes.</p>	

For the well-being of this community it's important that this land is protected and to remain undeveloped. The trees on their own help to counter the issues of pollution in the area.

Thank you for your support in this matter.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Colin Winstone (41293985)</b>
<b>Organisation:</b>

<b>Response ID: 1111842</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Local Green Space: Sunbury Common : Catherine Drive I would like to express that the green in Catherine drive is of the utmost importance to our community and an integral part of the area's natural beauty. It is used daily by myself for exercise and walking on my 4 dogs. My neighbour's children use it daily for recreational purposes. The adults use it for communal gatherings and recently it was used for the queen's jubilee. Over the past 50 years this green has contributed to the wellbeing of the residents and has been maintained by the council and us. We take pride in the green and its appearance and use it to its full potential. It was most gratefully received in the recent pandemic where we were able to socially meet and talk to my neighbours (socially distanced) and keep a good sense of wellbeing in the community. ( this is most important to myself as I live alone and communication with my neighbour's is paramount. I am an integral part of this community and look to assist with parking in and around the green in order to maintain a clear and uncongested flow around the green. My concern is

that any building work on this green should it be permitted would ruin the outlook and remove the use from us which we have enjoyed for 50years. This is very important to me so much so we have applied for a tree preservation order in order to protect the wildlife and ambiance of the area. one tree has been planted in memory of one of my residents' brothers who passed away in 2009 and regularly used this area for recreation and interaction with other children. I would like this green to be protected as it is an integral part of my life and has been since i moved in 1975. Any change would be catastrophic to my wellbeing and that of my neighbours.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr R Wisdom (41658689)</b>
<b>Organisation:</b>

<b>Response ID: 1128563</b>
<b>Policy / Evidence Base / Part of Plan:</b> Evidence base - LGS
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Is concerned regarding the plans for the Green and other LGS and the situation regarding the encroaching of the Green Belt. I wish Heatherlands to be protected as LGS as with with others in Sunbury Common area. Heatherlands Green is compact, too small for development and has over many years suffered with drainage problems. Parking is an issue too. Many people from Vicarage Road are forced to park here due to lack of space along their road. We have two healthy trees growing on the Green which help to contribute towards clean air and gives a pleasant outlook. Sunbury Common suffers from very high pollution due to traffic and sometimes aircraft making it an unpleasant and unhealthy place to live so please don't make things worse. We need more trees not buildings.
<b>Question 6:</b> You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr R Wisdom (41658689)</b>
<b>Organisation:</b>

<b>Response ID: 1113575</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Is concerned regarding the plans for the Green and other LGS and the situation regarding the encroaching of the Green Belt. I wish Heatherlands to be protected as LGS as with with others in Sunbury Common area. Heatherlands Green is compact, too small for development and has over many years suffered with drainage problems. Parking is an issue too. Many people from Vicarage Road are forced to park here due to lack of space along their road. We have two healthy trees growing on the Green which help to contribute towards clean air and gives a pleasant outlook. Sunbury Common suffers from very high pollution due to traffic and sometimes aircraft making it an unpleasant and unhealthy place to live so please don't make things worse. We need more trees not buildings.
<b>Question 6:</b> You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent: Kimberley Wright (41483361)</b>
<b>Organisation:</b>

<b>Response ID: 1124073</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy ST2: Planning for the Borough
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
Green Belt/Sunbury Common/Groveley Road Whilst I appreciate the need for extra housing and the most obvious answer is to use the Green Belt I can't help thinking that this defers from the original source of why a green belt was created in the first instance ? Again if you look at cities such as Hong Kong which is well built up, it has an excellent transport system. Would this be the case if extra housing were to be built here in Sunbury along with offering the 60+ Oyster Card ? I would suggest if the houses were to be built then opposite the allotment would be the best place as this may not interfere with residents. However I do object if they are to be built opposite a residential area and would be interested to know the reduction offered in council tax plus any offerings for devaluation of property.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mr Tim Wright (41993921)</b>
<b>Organisation:</b>

<b>Response ID: 1117305</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
<p>I am responding to the leaflet pushed through our door regarding the Local Green Space in front of our house in Village Way Ashford.</p> <p>I would oppose vigorously any proposal for development of the small area of grass which is directly in front of our property. Village Way is a tree lined road with a lovely village demeanor and this is the only grassy area in the vicinity.</p> <p>We have lived in the house for 30 years and over this period of time the grassy area has been much used by the local residents.</p> <p>There have been numerous street parties celebrating Jubilees, VE day etc. Many local residents especially the elderly who cannot walk to the local park will bring their small dogs here for exercise. Over the years our own and many neighbours children have utilised the grassy area to meet and play safely within eyesight of the homes. The local Primary School at the end of Village Way has brought groups of pupils to the area to study and draw the wildlife. The pupils have also utilised this area as a meet when carrying out their cycling proficiency tests.</p>

I would therefore ask that this area of grass is retained as a Local Green Space.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Mrs Rana Yewer (42036993)</b>
<b>Organisation:</b>

<b>Response ID: 1118041</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
I would like to put my reasons into protecting the above mentioned green space - The main reason I bought my property was because of this green space . A majority of the properties in Courtfield Road, Stroud Way & Landon Way have small gardens therefore this small green space is vital for allowing my children along with other neighbours children / grandchildren to play safely. - The green space provides a lovely outlook from our home and has a beautiful tree on it which provides a home for many birds & wildlife . - The residents have already sacrificed a large amount of the original green space to create 9 car parking spaces. Parking is at a premium in our roads and therefore protecting the green space also protects these invaluable parking spaces. - It provides a vital communal area for residents to celebrate commemorative events such as Jubilee Parties and New Years Day , all of which are always a great success .

- It also provides a small area for residents to meet with their dogs before embarking on a longer walk . The dogs all love to meet and as a result get along well.  
Thank you for allowing me this opportunity to put forward my & my families reasons for protecting our green space. Please contact me if you require any further information.

**Question 6:** You can upload any modifications below.

No Response

**Question 7:** If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response

<b>Respondent: Janice Young (41993953)</b>
<b>Organisation:</b>

<b>Response ID: 1117307</b>
<b>Policy / Evidence Base / Part of Plan:</b> Policy E5: Open Space and Recreation
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered: No Response   Additional Comments: No Response
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy: No Response
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
No Response
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
LGS : Ashford Common : Stroud Way I have lived here nearly 18 years , we walk our dog on the green which a lot of people do , children play on there as well , also we've had a fireworks event on here most years , it's a nice outlook with the tree which blossoms every spring .
<b>Question 6:</b> You can upload any modifications below.
No Response

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
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Yes/No/Not answered: No Response

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary: No Response



<b>Respondent:</b> ( )
<b>Organisation:</b>

<b>Response ID:</b>
<b>Policy / Evidence Base / Part of Plan:</b>
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered:   Additional Comments:
<b>Question 2:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>sound</b> ?
Yes/No/Not answered:   Additional Comments:
<b>Question 3:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan <b>complies with the Duty to co-operate</b> ?
Yes/No/Not answered:   Additional Comments:
<b>Question 3a:</b> If you do not consider this part of the Pre-Submission Spelthorne Local Plan to be sound, please select which test/tests of soundness this relates to.
Not positively prepared/Not justified/Not effective/ Not consistent with national policy:
<b>Question 4:</b> Please give details of why you consider the Local Plan is <b>not legally compliant</b> or is <b>unsound</b> or <b>fails to comply with the duty to co-operate</b> . Please be as precise as possible.
If you wish to <b>support</b> the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments:
<b>Question 5:</b> Please set out the <b>modification(s)</b> you consider necessary to <b>make</b> the Pre-submission Spelthorne Local Plan <b>legally compliant</b> and <b>sound</b> , in respect of any legal compliance or soundness matters you have identified above.
<b>Question 6:</b> You can upload any modifications below.

<b>Question 7:</b> If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Yes/No/Not answered:
If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:



<b>Respondent:</b> ( )
<b>Organisation:</b>

<b>Response ID:</b>
<b>Policy / Evidence Base / Part of Plan:</b>
<b>Question 1:</b> Do you consider this part of the Pre-Submission Spelthorne Local Plan to be <b>legally compliant</b> ?
Yes/No/Not answered:   Additional Comments:
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