

Spelthorne Borough Council

Sustainability Appraisal

Post Examination Addendum – Main Modifications
April 2025



Spelthorne Takes Shape



Document History

The following tables record the various Sustainability Appraisal reports that have been produced to date.

Sustainability Appraisal Scoping Report (Stage A)

Date	Title	Content
March 2017	Sustainability Appraisal/Strategic Environmental Assessment Final Scoping Report	Issue for stand-alone consultation
June 2022	Sustainability Appraisal/Strategic Environmental Assessment Scoping Report Update	Updated scoping report to reflect latest position at Regulation 19 stage

Sustainability Appraisal (Stage B/C)

Date	Title	Content
September 2018	Sustainability Appraisal Issues & Options consultation	Issue for consultation alongside Local Plan Issues and Options Report
February 2021	Sustainability Appraisal Preferred Options consultation	Issue for consultation alongside Reg 18 Draft Local Plan Report
May 2022	Sustainability Appraisal of Draft Spelthorne Local Plan	Issue for consultation alongside the Reg 19 Pre-Submission Local Plan

Sustainability Appraisal (Stage C/D)

Date	Title	Content
May 2022	Sustainability Appraisal of Draft Spelthorne Local Plan	Issue for consultation alongside the Reg 19 Pre-Submission Local Plan
December 2022	Sustainability Appraisal Addendum Alternative Strategy	A further strategic growth option was subsequently identified, arising out of Duty to Cooperate discussions with Elmbridge Borough Council
December 2024	Sustainability Appraisal Addendum	Issued ahead of Local Plan Examination in Public Hearing sessions
April 2025	Sustainability Appraisal of the Submission Local Plan	Addendum to address Main Modifications raised at Examination.

	Post Examination Addendum Main Modifications This report.	
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1. Introduction

Local Plan overview

- 1.1 The new Local Plan prepared by Spelthorne Borough Council (SBC) sets out the policies and plans to guide the future development of the borough in the period 2024 - 2039. It identifies the scale of development and also the key locations that will be used to meet this need including:
 - A destination and strategic objectives for the borough
 - A development strategy to provide:
 - a framework for the allocation of sites for specific uses (for example, housing use)
 - the context for designating areas where specific policies will apply, either encouraging development to meet economic and/or social objectives or constraining development in the interests of environmental protection
 - Further strategic policies to guide both place shaping and development management policies
 - Place Shaping Policies, including spatial policies for the borough's key settlements and matters and site-specific allocations
 - Development Management policies to shape the form of development at application stage both for sites allocated in the Local Plan and other sites that come forward during the plan period
- 1.2 The plan was submitted for examination in November 2022 and was the subject of initial examination hearings in May 2023. At the Extraordinary Council Meeting on 6 June 2023 a motion was agreed to pause the remainder of the Local Plan examination hearings to allow time for the new council to understand and review the policies. During this period of pause, the Council has undertaken additional work to support the submission Local Plan and worked with relevant stakeholders to reach an agreeable outcome on the content of the Local Plan policies and allocation sites.
- 1.3 The Local Plan hearing sessions resumed in January 2025 on the remainder of the policies.

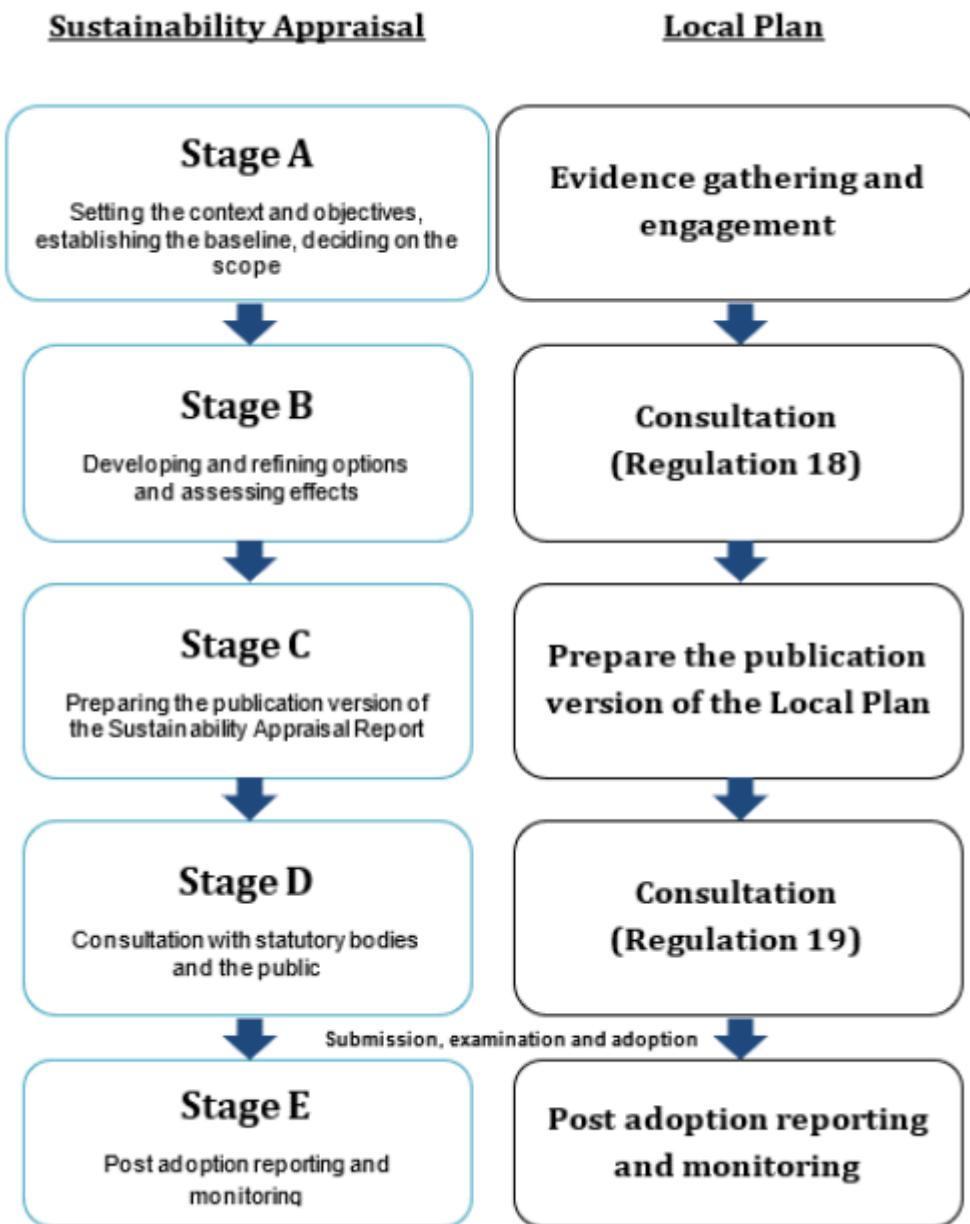
Sustainability Appraisal Background

- 1.4 A Sustainability Appraisal (SA) is required during the preparation of a Local Plan by the Planning and Compulsory Purchase Act 2004 to

ensure compliance with the requirements of the Strategic Environmental Assessment Directive. Its purpose is to help the Local Authority assess how effectively the Local Plan contributes to sustainable development.

1.5 There are five key stages in the preparation of a Sustainability Appraisal that are carried out alongside the preparation of a Local Plan (see Figure 1).

Figure 1: Sustainability Appraisal Process



1.6 Stage A of the sustainability appraisal process was undertaken in 2016-2017 and resulted in the production of a Scoping Report that was consulted on in 2017. The report was then updated in 2022 to provide a more up to date version of the document alongside the Local Plan consultation. The Stage A Scoping Report should be referred to for a

description of the original baseline, relevant plans, policies and programmes and the justification for the sustainability objectives that are being implemented in this report.

- 1.7 The Stage B of the sustainability appraisal process began in 2017 and was summarised initially with the production of the Issues and Options Stage Sustainability Appraisal.
- 1.8 As options were continually developed and refined, a SA report to accompany both the Preferred Options and Pre-Submission Local Plans at Regulation 19 Stage were prepared in February 2021 and May 2022 respectively. Views from statutory consultees and other interested parties were sought throughout the Sustainability Appraisal process.
- 1.9 The SA was consulted on alongside the Pre-submission Local Plan from June to September 2022 - a report which represented the end of Stage D.

2. Legal Compliance

The SEA Directive

- 2.1 The Sustainability Appraisal process associated with the production of the new Local Plan incorporates the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the “Strategic Environmental Assessment Regulations”), which implement the requirements of the European Directive 2001/42/EC (the “Strategic Environmental Assessment Directive”) on the assessment of the effects of certain plans and programmes on the environment. The Planning and Compulsory Purchase Act 2004 requires that a SA is used to implement the legal requirements of the SEA regulations (whilst also considering economic and social impacts).
- 2.2 It is noted that the UK left the EU on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 (“the Withdrawal Act”). This established a transition period for retaining the body of existing EU-derived law within our domestic law, including the SEA Regulations. The Retained EU Law (Revocation and Reform) Act, which sets out a deadline for the transition period of 31st December 2023 became law on 29th June 2023. After this date, EU-derived law that had not been revoked, amended or replaced was assimilated into the UK Statute book.

The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2010

- 2.3 The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2010, collectively referred to in this report as the Habitats Regulations, implements the Habitats Directive in England & Wales. Under the

Habitats Regulations any plan or project likely to have a significant adverse effect upon the integrity of a ‘European site’ must be subject to an appropriate assessment to determine the implications for the designated site in view of its conservation objectives. ‘European sites’ are sites which are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species within a European context. They consist of Special Areas of Conservation (SAC) designated under Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora and Special Protection Areas (SPA) designated under Council Directive 2009/147/EC on the Conservation of Wild Birds.

- 2.4 Under the Habitats Regulations the Council, as the competent body, must determine if the Local Plan is likely to have a significant effect on the biodiversity of a European site, either alone or in combination with other plans or projects. If significant effects are predicted, then an appropriate assessment of the implications for the site in view of its conservation objectives must be undertaken.
- 2.5 As above, the UK left the EU on 31st January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 (“the Withdrawal Act”) which retains EU law. The most recent amendments to the Habitats Regulations – the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 – make it clear that the need for Habitats Regulations Assessments (HRA) will continue after the end of the Transition Period.
- 2.6 The HRA process is explained in the main HRA report for the Local Plan. This is available on the Council’s Local Plan examination website at CD007: [Habitats Regulations Assessment – Stage 2 – Appropriate Assessment \(2022\)](#).
- 2.7 In summary, an Appropriate Assessment, has been undertaken which looks at the potential effects of the policies contained in the Local Plan on The South West London Water bodies SPA and Ramsar site (in relation to potential LSE of habitat fragmentation); Windsor Forest and Great Park SAC (in relation to potential LSE of changes in air quality); Thames Basin Heaths SPA (in relation to potential LSE of increased recreational pressures); and Thursley Ash, Pirbright and Chobham Common SAC (in relation to potential LSE of increased recreational pressures).
- 2.8 In this regard, all of the allocations and policies in the Local Plan were assessed for potential conflicts with this European site. The final conclusions and recommendations of this HRA report have been subject to consultation comments from Natural England, which have been fully integrated into this assessment and its conclusions. It is concluded that the Policies regarding development set out in the emerging Local Plan are unlikely to have significant effects on the qualifying features and conservation objectives and no adverse effect

on integrity, alone or in combination with other plans, on any Habitats sites in the Borough or immediate surrounds.

2.9 The main modifications proposed following Examination have not changed this conclusion given that no significant changes have been proposed to the content of the policies or allocation sites.

3. Methodology

3.1 The Council is legally required under both European and UK law to prepare a Sustainability Appraisal (SA) of the Local Plan in order to help ensure that sustainability objectives which consider social, environmental and economic factors are taken into account during all stages of the Plan preparation.

3.2 The full SA methodology can be found in the [Publication Plan \(Regulation 19\) SA report](#). The scoped set of Sustainability Appraisal objectives are also at Appendix A.

3.3 The process of the SA has been integral to the development of the Spelthorne Local Plan, with findings published and consulted upon alongside the Local Plan at each stage of its preparation.

3.4 The SA process has included the preparation of a series of documents including the Revised Sustainability Appraisal Scoping Report (2022), the Sustainability Appraisal of the Issues and Options (Regulation 18) (2018), the Preferred Options Local Plan (Regulation 18) (2021), the Sustainability Appraisal of the Publication Local Plan (Regulation 19) (2022), the SA addendum (2025) and this further Addendum report.

3.5 Sustainability Appraisal is an iterative process and has been used to assess policy options and site selection to ensure that the plan contributes to the achievement of sustainable development, and any potential negative impacts on sustainability are minimised or effectively mitigated.

4. Purpose of this Addendum Report

4.1 This document comprises an addendum to the Sustainability Appraisal of the Publication Local Plan which was submitted as part of the Local Plan examination ([CD004](#)).

4.2 Since the Local Plan examination hearings which took place between May – June 2023, then after a pause in January – February 2025, a number of Main Modifications to the Local Plan have been proposed. These Main Modifications (including changes to the Policies Map designations where relevant) are likely to be required to make the

Local Plan ‘sound’¹. This addendum to the SA provides an assessment as to whether the proposed Main Modifications to the Local Plan are likely to have significant impacts on the sustainability objectives. This Addendum considers the potential for significant sustainability implications of each of the proposed Main Modifications and presents an assessment of any potential sustainability implications which might arise.

- 4.3 Consideration of each Main Modification is set out in Section 5. In every case, the Main Modification details the proposed modification and the reason for change, and an assessment of the impact of the change upon the findings of the sustainability appraisal is provided in the final column. Where a modification prompts a need to reassess the sustainability appraisal, the row is shaded, and the details are set out in Section 6.
- 4.4 The proposed Main Modifications are subject to public consultation from 3 April 2025 to 15 May 2025. This is a supporting document to the consultation and comments can be made on these supporting documents during the consultation period. Responses will be forwarded to the Inspector, who will take them into account before issuing their report. Following the adoption of the Local Plan, the Council will issue a Sustainability Appraisal Adoption Statement.

¹ Plans are ‘sound’ if they are: (a) Positively prepared, (b) Justified, (c) Effective, (d) Consistent with National Policy, NPPF 2021.

5. Consideration of Main Modifications and Impacts on Sustainability Appraisal

The Main Modifications below are expressed by specifying the modification whereby additions are in **bold**, and removals are ~~strikethrough~~. The page numbers and paragraph numbering below refer to the Publication Local Plan (as submitted), and do not take account of the deletion or addition of text.

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Throughout	MM01	<p>Amend plan period to 2024 - 2039 throughout the Plan.</p> <p>Cover page; Chapter 2 heading; Paragraphs 2.4; 3.1; 3.9; 3.12.</p>	<p>In order that Plan is consistent with national policy and positively prepared, plan period amended to reflect latest housing trajectory and supply period.</p>	Not significant
All policies	MM02	<p>Remove Sustainability Appraisal Indicators from all policies (ST1, ST2, PS1, PS2, PS3, SP1, SP2, SP3, SP4, SP5, SP6, SP7, H1, H2, H3, E1, E2, E4, E5, EC1, EC2, EC3, EC4, ID1, ID2)</p>	<p>Included for consultation purposes only. A full Sustainability Appraisal and Addendum (CD004 and CD004a) accompany the Local Plan.</p>	Not significant
Introduction	MM03	<p>Update 1.1: The Spelthorne Local Plan, which has been prepared by the Council in consultation with the community, sets out the policies and allocations that will guide how new development and infrastructure comes forward in the Borough for the next 15 16 years</p>	<p>In order that Plan is consistent with national policy, text updated to reflect period Local Plan covers.</p>	Not significant
	MM04	<p>Remove paragraph 1.5 as follows:</p> <p>The Staines Development Framework (SDF) is a key SPD. It demonstrates how the town can grow in a sustainable and sensitive way, delivering for our residents, while offering the necessary protection to areas. Critically the SDF is rooted in a commercial reality, essential in demonstrating that Staines can successfully accommodate the growth required for the Local Plan to be successfully delivered, while providing much needed homes for our</p>	<p>The Staines Development Framework no longer forms part of the Local Plan evidence base. Removal of reference to ensure the Local Plan is sound and justified,</p>	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Introduction		residents, improving the infrastructure and addressing climate change.	based on proportionate evidence.	
	MM05	<p>Amend paragraph 1.14 as follows:</p> <p>The public consultation on the final draft of the Local Plan (Regulation 19 consultation) will take took place from June to September 2022. The Pre-Submission Publication Version is the version of the Plan that the Council intends to submit to the Planning Inspectorate for examination by an independent Inspector. Any A schedule of proposed changes to the final draft Local Plan are submitted alongside the Plan for the Planning Inspector to decide which are appropriate. The Staines Development Framework as an SPD does not require submission to the Planning Inspectorate but as both documents are so intrinsically linked it is the right approach for them to be considered together.</p>	<p>Editorial (including tense) updates to reflect the current stage of the Plan.</p> <p>The Staines Development Framework no longer forms part of the Local Plan evidence base. Removal of reference to ensure the Local Plan is justified, based on proportionate evidence.</p>	Not significant
	MM06	<p>Amend paragraph 1.19 as follows:</p> <p>Once this has taken place, all Members of the Council will be asked to adopt the the Plan and the SDF at a formal meeting. If adopted, the policies in the Local Plan and the Staines Development Framework will carry full weight and supersede former planning policies in older documents.</p>	<p>The Staines Development Framework no longer forms part of the Local Plan evidence base. Editorial update. Removal of reference to ensure</p>	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
			the Local Plan is, based on proportionate evidence.	
	MM07	<p>Remove Figure 1 as follows:</p> <p>Figure 1: Spelthorne Local Plan Process</p>	<p>The Staines Development Framework no longer forms part of the Local Plan evidence base. Removal of reference to ensure the Local Plan is justified, based on proportionate evidence.</p>	Not significant
2. The Route to 2037	MM08	<p>Update figure numbers.</p> <p>Figure 2 1: Spelthorne at a Glance</p>	<p>As a result of removing previous Figure 1.</p>	Not significant
	MM09	<p>Amend paragraph 2.6 first bullet as follows:</p> <p>Engaging with individuals, residents' associations and other community groups so that they are better informed and have opportunity to participate in the Local Plan and Staines Development Framework preparation.</p>	<p>The Staines Development Framework no longer forms part of the Local Plan evidence base. Removal of reference to ensure the Local Plan is justified, and based</p>	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
			on proportionate evidence.	
ST2: Planning for the Borough	MM10	<p>Amend housing requirement per annum figure throughout the Plan as follows:</p> <p>Policy ST2 (1) and paragraph 3.10; Policy ST2 monitoring indicators: Net number of new homes delivered per annum H1 (1) and paragraph 6.9.</p> <p>618 631</p>	Per annum figure updated to be consistent with national policy and plan positively prepared by meeting areas objectively assessed need.	Potential to be significant
		<p>Amend total and new home housing numbers in Policy ST2 1):</p> <p>The housing requirement for Spelthorne is 618 631 dwellings per annum over the plan period (2024-2039), a total of 9,270 10,096. During the plan period, provision has been made for at least 9,270 9,911 new homes. Table 1 shows the contribution of all sources of housing supply.</p>	Per annum figure updated to be consistent with national policy and plan positively prepared by meeting areas objectively assessed need. Reflecting the latest housing trajectory updated since submission.	Potential to be significant
	MM12	Amend Policy ST2 (footnote 9) as follows:	Base date updated to be consistent with national policy.	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA									
ST2: Planning for the Borough		9 As calculated using the standard method for assessing housing need at 2019 with a base date of 2024. The Council will review the local housing need figure as and when appropriate, guided by the Government's approach to assessing housing need.	Clarifying the date and therefore methodology used to calculate housing need.										
	MM13	<p>Updated Sources of supply over the plan period as follows:</p> <p>Table 1: Sources of supply over the plan period: 2022–2037–2024 – 2039 (net number of homes)¹⁰</p> <table border="1"> <thead> <tr> <th>Source</th><th>Approx. number</th><th>Comments</th></tr> </thead> <tbody> <tr> <td>Allocations</td><td>6,073 5,964*</td><td>829-792 in Green Belt 5,244 4,902 in Urban area 5% under-delivery discount applied</td></tr> <tr> <td>Brownfield Tier 2 sites (> 5 units)</td><td>1,729 1,007**</td><td>5% under-delivery discount applied</td></tr> </tbody> </table>	Source	Approx. number	Comments	Allocations	6,073 5,964*	829-792 in Green Belt 5,244 4,902 in Urban area 5% under-delivery discount applied	Brownfield Tier 2 sites (> 5 units)	1,729 1,007**	5% under-delivery discount applied	<p>Figures updated to be consistent with national policy and plan positively prepared by meeting areas objectively assessed need. Reflecting the latest housing trajectory updated since submission.</p> <p>Not significant</p>	
Source	Approx. number	Comments											
Allocations	6,073 5,964*	829-792 in Green Belt 5,244 4,902 in Urban area 5% under-delivery discount applied											
Brownfield Tier 2 sites (> 5 units)	1,729 1,007**	5% under-delivery discount applied											

Section of the Plan	Proposed modification reference	Proposed Modification				Justification/Reason for Change	Implication for SA
ST2: Planning for the Borough		Windfall: Small sites	570 688	38 43 per annum x 15 16 years			
		Windfall: Office to residential permitted development	275 486	36 54 per annum in 6-10 years 48 36 per annum in 11-15 16 years			
		Under construction	792 1,457	As of 31 March 2022 2024			
		Extant permissions not started	579	5% under-delivery discount applied			
		Total	9,439 9,911				
		Average per annum	629 619				
		<p>* Yields identified in the Local Plan supersede that identified in the SLAA for allocated sites.</p> <p>** Excluding sites identified for allocation in the Local Plan</p>					
	MM14	Add Table summarising housing trajectory figures				To reflect updates to Table 1, showing 15 year plan period consistent with national policy.	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
	MM15	Add Figure housing trajectory graph	To reflect updates to Table 1, showing 15 year plan period consistent with national policy.	Not significant
	MM16	<p>Amend paragraph 3.12 as follows:</p> <p>Not all sites identified in the SLAA have been allocated in the Local Plan due to their non-strategic nature and the lack of benefits identified from an allocation. As such they are expected to be delivered as windfall development and are identified as 'Brownfield Tier 2' sites. In addition, an allowance for small sites and office to residential permitted development has been identified based on past trends. Sites under construction as of March 2022 April 2024 are included within the supply, with a 15 16 year period from 2022 2024 to 2037 2039.</p>	Plan period updated to be consistent with national policy and plan positively prepared by meeting areas objectively assessed need. Reflecting the latest housing trajectory updated since submission.	Not significant
Strategy and Strategic Policies	MM17	Addition of new policy ST3: Local Plan Immediate Review policy.	Agreed commitment to an immediate Review of the Local Plan to ensure plan is positively prepared to meet objectively assessed needs.	Potential to be significant
Place Shaping, Introduction	MM18	<p>At 4.2, amend as follows:</p> <p>The Council declared a climate emergency in October 2020 and recognises that climate change is the greatest challenge currently facing us. Every decision we take must count towards reducing</p>	Typographical error, updated to reflect Council climate emergency text.	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
		carbon emissions and both climate change mitigation and adaptation . Our Local Plan will help to support the transition to a low carbon future, helping to address the climate emergency, taking account of flood risk.	Justified as appropriate strategy for Local Plan to support.	
PS1: Responding to the Climate Emergency	MM19	Remove bullet point 3 (b)	To ensure consistency with national policy as requirements for electric vehicle charging points are now set out in Building Regulations Approved Document S.	Not significant
	MM20	Remove bullet point 5	To ensure consistency with national policy as requirement now set out in Building Regulations Approved Document L.	Not significant
	MM21	4.10 In June 2019, the Government announced that the UK will 'eradicate its net contribution to climate change by 2050' by legislating for net zero emissions – the first G7 country to do so. In order to reach this target, all buildings will need to be net zero	Editorial update to reflect climate emergency text. Justified as	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA		
PS1: Responding to the Climate Emergency		carbon by 2050. In April 2021 October 2020 Spelthorne Borough Council declared a climate emergency and has committed to work with the local community and all other relevant partner agencies to support making the Borough carbon neutral as soon as practically possible.	appropriate strategy for Local Plan to support.			
	MM22	4.12, in second sentence amend to: The NPPF (2021, para 148152) sets out that the planning system should help to shape places in ways that minimise vulnerability and improve resilience and support renewable and zero carbon energy and associated infrastructure.	Editorial update to specify and correct a paragraph reference, to be consistent with national policy	Not significant		
	MM23	<p>Add additional monitoring indicator:</p> <table border="1" data-bbox="592 843 1401 1017"> <tr> <td data-bbox="592 843 848 1017">Number of commercial premises built to BREEAM 'Very good' or better</td><td data-bbox="848 843 1096 1017">Achieve Very good or better rating</td><td data-bbox="1096 843 1401 1017">In house monitoring</td></tr> </table>	Number of commercial premises built to BREEAM 'Very good' or better	Achieve Very good or better rating	In house monitoring	To ensure plan is effective by policy being accurately monitored, informing the need to amend implementation processes or undertake a review of the policy.
Number of commercial premises built to BREEAM 'Very good' or better	Achieve Very good or better rating	In house monitoring				
MM24	<p>Add additional monitoring indicator:</p> <table border="1" data-bbox="592 1144 1401 1287"> <tr> <td data-bbox="592 1144 848 1287">Installed renewable/low carbon energy capacity (MW/h)</td><td data-bbox="848 1144 1096 1287">To increase renewable energy capacity</td><td data-bbox="1096 1144 1401 1287">In house monitoring</td></tr> </table>	Installed renewable/low carbon energy capacity (MW/h)	To increase renewable energy capacity	In house monitoring	To ensure plan is effective by policy being accurately monitored, informing the need to amend implementation processes or	Not significant
Installed renewable/low carbon energy capacity (MW/h)	To increase renewable energy capacity	In house monitoring				

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
			undertake a review of the policy.	
PS2: Designing Places and Spaces	MM25	<p>Amend Policy PS2 (1) as follows:</p> <p>The Council will require a high standard in the design and layout of new development. Proposals for new development should demonstrate that they will:</p> <ul style="list-style-type: none"> • will create buildings and places that are attractive with their own distinct identity; • will respect and make a positive contribution to the street scene and the character of the area in which they are situated; and • will pay due regard to the scale, height, proportions, building lines, layout, materials and other characteristics of adjoining buildings and land; <p>• have been developed in accordance with the principles principles set out in the National Model Design Code and adhere have regard to any design policies and codes which are produced.</p>	To ensure the policy is effective and clear without reliance on (but having regard to) future supplementary documents.	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
PS2: Designing Places and Spaces	MM26	<p>Amend PS2 (7) by splitting paragraph and amending the wording as follows:</p> <p>7) 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. [Paragraph split]</p> <p>8) On a case-by-case basis, it may be appropriate for larger developments to be shaped by a design panel review panel process proportionate to their scale and significance, at the applicant's expense, and in conjunction with the Council.</p>	<p>Paragraph 7 is split to ensure it is effective and clear regarding the Council's design, and design review panel expectations, at 8). This is a distinct matter to 7) which provides guidance about larger development that may be suitable to create its own identity.</p> <p>The Staines Development Framework no longer forms part of the Local Plan evidence base. Removal of reference to ensure the Local Plan is sound and justified, based on proportionate evidence.</p>	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
PS2: Designing Places and Spaces			Minor editorial update and words 'proportionate to their scale and significance' are added to for effectiveness and clarity about which sites are most likely to require the input of a design review panel.	
	MM27	<p>Add a new paragraph 4.24 to read:</p> <p>Consideration of detailed design and the need for a Design Review Panel should take account of the site's context, including whether it is located in a sensitive location, the scale, height and density of the surrounding built environment and the potential for change to meet local development needs. To ensure reasonable application of PS2.8) to larger sites allocations, a site-specific requirement on design review is</p>	To improve the effectiveness of the policy and to explain the approach to detailed design and use of design review panels in various site	Potential to be significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
		<p>included where a site's anticipated yield incorporates 75+ dwellings. This requirement states that detailed design should be developed collaboratively between the applicant and the local planning authority (LPA) and encourages use of a Design Review Panel where it can positively shape development.</p>	allocations policies (listed at MM120)	
PS3: Heritage, Conservation and Landscape	MM28	Amend (1): The Council will seek to preserve, conserve and enhance as appropriate the architectural, historic and landscape character of the Borough.	Deletion of "conserve", to ensure the policy is consistent with national policy aligning the Councils statutory duties as set out in Planning (Listed Buildings and Conservation Areas) Act 1990.	Not significant
	MM29	<p>Add paragraph to Policy PS3 as follows: The Council will not support redevelopment proposals that would involve the loss of locally listed buildings or other structures, or unsympathetic proposals that would damage their character and setting.</p>	Paragraph added to be consistent with national policy seeking to protect locally listed buildings.	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Spatial Policies, Introduction	MM30	<p>Amend paragraph 5.2 as follows:</p> <p>As well as considering the urban environment, there is also an approach to the Borough's river network and water quality issues. This allows for opportunities to improve the local environment and biodiversity as well as ensuring that impacts on the network are avoided or mitigated.</p>	Amendment for clarity and to broaden topic to enhance positive impacts.	Not significant
Policy SP1: Staines-upon-Thames	MM31	<p>Amend wording to whole Policy SP1: Staines-upon-Thames.</p>	<p>To ensure the policy is self-contained, clear and effective without reliance on future supplementary documents</p> <p>The Staines Development Framework no longer forms part of the Local Plan evidence base. Removal of references to ensure the Local Plan is justified, based on proportionate evidence.</p>	Potential to be significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Policy SP4: Green Belt	MM32	<p>Amend Policy SP4 (1) as follows:</p> <p>The Green Belt boundary is defined on the Policies Map. In order to uphold the fundamental aims of the Green Belt to prevent urban sprawl and to keep land within its designation permanently open, inappropriate development will not should not be approved unless except in very special circumstances can be demonstrated. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm is clearly outweighed by other considerations.</p>	Wording amended to ensure policy SP4 is consistent with national policy.	Not significant
	MM33	<p>Amend paragraph 5.21 as follows:</p> <p>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.</p>	Amendment to aid clarity and ensure Local Plan is effective.	
Policy SP5: Colne Valley Regional Park	MM34	<p>Amend Policy SP5 (1) as follows:</p> <p>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.</p>	Amendment to aid clarity. To enhance positive impacts.	Not significant
	MM35	<p>Amend paragraph 5.22 as follows:</p> <p>The Colne Valley Regional Park covers over 10,000 hectares to the west of London. It forms a narrow corridor of countryside, much of it within the Green Belt, stretching from Rickmansworth in the north to Staines and Wraysbury in the South where the River Colne joins the Thames. It is some 14 miles long and 3 miles wide at its widest</p>	Wording added to make clearer specific reference to the SNCI and SSSI sites in Colne Valley to ensure it is effective and	

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
		point. It straddles a number of local authority boundaries. The area within Spelthorne covers some 1,000 hectares and comprises three major reservoirs, the areas of Staines Moor, Hithermoor and the settlement of Stanwell Moor. In addition, the River Colne SNCI and King George VI SSSI are key features and located within the Park.	consistent with national policy.	
	MM36	Amend paragraph 5.23 as follows: The Colne Valley Regional Park was conceived in the 1960's with the broad aims of providing for informal recreation in a countryside setting. The original objectives remain just as valid today, although they have been updated, modified and extended over the last 50 years:	Editorial amendment for clarity.	Not significant
Policy SP6: River Thames and its Tributaries	MM37	Amend Policy SP6 9) (d) as follows: 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.	Amendment for completeness and to ensure effectiveness	Not significant
	MM38	Amend paragraph 5.27 as follows: Policy SP6 aims to ensure that the setting of the river and its tributaries are protected and where possible enhanced. This involves protecting landscape features that contribute to the setting and protecting and enhancing views of the river. Works to the main river will require a Flood Risk Activity Permit under the Environmental Permitting (England and Wales) Regulations 2016.	To ensure consistency with national policy and compliance with the stated Regulations.	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Policy SP6: River Thames and its Tributaries	MM39	<p>Amend paragraph 5.30 as follows:</p> <p>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 areas 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 Scheme²² 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;</p> <ul style="list-style-type: none"> • a 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 and (Sunbury, Molesey and Teddington weirs); • new recreation areas for communities and habitat for wildlife; • large areas of green open space, improved wildlife habitats and 	To show positive preparation and effectiveness through partnership working and more comprehensive coverage of detail.	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Policy SP6: River Thames and its Tributaries		<p>opportunities for tourism, recreation and leisure; and</p> <ul style="list-style-type: none"> new and enhanced active travel routes for walking and cycling. 		
	MM40	<p>Amend paragraph 5.31 as follows:</p> <p>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.</p> <p>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 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. 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.</p>	<p>To ensure it is consistent with national policy, and effective with regard to the additional detail proposed.</p>	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
	MM41	<p>Amend paragraph 5.32 as follows:</p> <p>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. 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.</p>	Editorial amendment for accuracy	Not significant
	MM42	<p>Amend paragraph 5.33 as follows:</p> <p>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</p>	Editorial amendment relating to the project's future delivery.	Not significant
Policy SP7: Heathrow Airport	MM43	<p>Amend Policy SP7 (1) (b) (first bullet) as follows:</p> <p>seek to 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, Colne Valley Regional Park and open space of amenity and recreation value;</p>	Amendment to strengthen the policy and adding the additional reference to Colne Valley Regional Park to enhance effectiveness.	Not significant
	MM44	<p>Amend Policy SP7 (1) (b) (second bullet) as follows:</p> <p>demonstrate ecological offsetting and incorporate mitigation measures to achieve at least 10% biodiversity net gain;</p>	Amendment for clarity and to align with legislation (therefore is	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
			consistent with national policy).	
	MM45	<p>Development Close to Heathrow and Noise from Heathrow</p> <p>5) The Council will seek to minimise the adverse impact of development close to Heathrow by:</p> <p>(a) refusing new residential development where aircraft noise levels are at or exceed 66 dB LAeq; except in the case of the one-for-one replacement of dwellings and;</p> <p>(b) requiring appropriate attenuation measures for development between 60 and 65 dB LAeq.</p>	<p>Editorial amendment to clarify the measured units and the frequency rating (A) used.</p>	Not significant
Policy H1: Homes for All	MM46	<p>Amend footnote 26:</p> <p>As calculated using the standard method for assessing housing need, 2021 at 2019 with a base date of 2024. The Council will review the local housing need figure as and when appropriate, guided by the Government's approach to assessing housing need</p>	<p>Base date updated to be consistent with national policy. Clarifying the date and therefore methodology used to calculate housing need.</p>	Not significant
	MM47	<p>Amend 1) The Council will make provision for at least an additional 618 631²⁶ homes per annum in Spelthorne Borough over the plan period.</p>	<p>Per annum figure updated to be consistent with national policy and plan positively prepared by meeting areas objectively assessed need.</p>	Potential to be significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Policy H1: Homes for All	MM48	<p>Amend H1 (7):</p> <p>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. as set out in national policy (20%) until such a time that the Council sets its own benchmark level supported by up-to-date evidence, plans or strategies.</p>	<p>Policy updated to refer to the 20% requirement to be consistent with national policy and effective by clarifying this position until such a time that the Council produces evidence to support a different percentage.</p>	Not significant
	MM49	<p>Amend H1 (8):</p> <p>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:</p>	<p>To be effective by addressing the needs of wider community. Consistent with national policy definition of people with disabilities.</p>	Not significant
	MM50	<p>Amend H1 (8) (a):</p> <p>All new build dwellings will, as a minimum, be constructed in accordance with the requirements of Building Regulations Approved Document M Part requirement M4 (2) Category 2: Accessible and adaptable dwellings and any subsequent updates, unless it can be demonstrated that it is unfeasible to do so.</p>	<p>Factual correction to be consistent with national policy and the requirements within Approved Document M.</p>	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Policy H1: Homes for All	MM51	<p>Delete H1 (8) (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 Approved Document M requirement M4(3) standard: Category 3: Wheelchair user dwellings.</p> <p>Amend H1 (8) (c), which will become H1 (8) (b): 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) Category 3: Wheelchair user dwellings</p>	Justified based on evidence within Strategic Housing Market Assessment and consistent with national policy by referring to requirements within Approved Document M.	Not significant
	MM52	<p>Amend H1 (11): Where specialist accommodation falls within use class C3 a relevant use class *[footnote] an appropriate proportion of affordable housing in accordance with Policy H2 will be required.</p> <p>[Footnote] *As set out in policy H2 (g).</p>	To be effective and positively prepared by providing affordable housing not just on a single use type, to meet the areas objectively assessed needs. Brings H1 in line with the requirements for affordable housing in H2.	Not significant
	MM53	Amend H1 (14) (c): Where plots have been made available and marketed appropriately for at least 12 months and have not sold, the plot(s) will be	To be effective and ensure developments are	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Policy H1: Homes for All		<p>expected to remain on the open market as self-build or custom build or be offered to the Council or a Housing Association before being built out by the developer. will be returned to the developer to be built out as market housing.</p>	<p>deliverable. The Self Build and Custom Housebuilding Act 2015 does not require the Council to provide land for self and custom builders.</p>	
	MM54	<p>Amend 6.9: Using the standardised methodology, Spelthorne has a need of 618 631 new dwellings per annum. The Government makes clear that local planning authorities should be able to rely on the evidence used to justify their local housing need for a period of two years from the date they submit their Plan.</p>	<p>Per annum figure updated to be consistent with national policy and plan positively prepared by meeting areas objectively assessed need.</p>	Potential to be significant
	MM55	<p>Add new paragraph 6.16: Affordable housing on build to rent schemes should be provided by default in the form of affordable private rent, a class of affordable housing specifically designed for build to rent. Should the Council produce a supplementary planning document on affordable housing, this should be referred to on the type of affordable housing provision required within build to rent schemes.</p>	<p>To be consistent with national policy and effective by clarifying how this policy is intended to be used in the event of the Council producing a supplementary planning document.</p>	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
	MM56	<p>Amend paragraph 6.17:</p> <p>6.17 6.18 The intention of this approach will be to maximise the flexibility of new housing to accommodate a wider spectrum of housing needs. This will support the housing needs of older people but also those with specialist needs such as those who are disabled and wheelchair users, leading to positive impacts on health and well-being. Wheelchair accessible provision will be expected to be provided from the time the dwelling is ready for habitation to ensure homes contain required features and standards for residents without delay or expense.</p>	<p>To be effective and positively prepared by addressing the needs of community.</p> <p>Consistent with national policy by referring to requirements within Approved Document M.</p>	Not significant
	MM57	<p>Amend paragraph 6.19:</p> <p>6.19 6.20: Where the specific requirements of Building Regulations may not be achievable, an element of flexibility is recognised as being required in the delivery of these standards. This may be due to, site specific challenges around topography, flood risk and/or the relationship to design. It is acknowledged that a significant proportion of the Borough is at risk to flooding, and that this could be a constraint to achieving this. Where developers demonstrate that the M4(2) or M4(3) requirements are not feasible to be delivered on viability grounds exemptions will be on a case-by-case basis on the clear evidence submitted at planning application stage, e.g. the topography of the site makes provision as a whole not feasible and impacts development viability significantly. Applicants will be expected to consider all other reasonable options for Accessible Home provision, for example ground floor</p>	<p>To be positively prepared by clarifying what options are to be fully considered to help meet needs of the community.</p>	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
		provision or ramped access, prior to demonstrating an exemption is required.		
Policy H2: Affordable Housing	MM58	<p>Amend H2 (1):</p> <p>1) The Council will require at least 30% affordable housing units on all schemes of 10 units (net) or more. Greenfield sites will be expected to deliver at least 50% affordable housing. The minimum amount of affordable housing to be delivered should be calculated based on the net total amount of provided dwellings.</p>	To be positively prepared and effective by clarifying the requirement is based on net total dwellings, not gross total.	Not significant
	MM59	<p>Amend H2 d):</p> <p>Proposals for housing need to meet the need as identified in the most up to date housing needs assessment with particular regard to size, type and tenure of dwellings. The tenure split should be informed by the most up to date Council evidence. The tenure and number of bedrooms of the affordable homes provided on each qualifying site must contribute towards meeting the mix of affordable housing needs identified in the Strategic Housing Market Assessment³¹. This currently includes a tenure split of 75% affordable/social rent, with 25% First Homes as per national guidance³² . A minimum of 10% of the homes provided on each site must be available for affordable home ownership, except where an exemption applies in the NPPF.</p>	To demonstrate the policy is justified by using evidence within the Strategic Housing Market Assessment and positively prepared to allow use of updated evidence to inform future affordable housing needs.	Not significant
	MM60	<p>Amend Footnote 29:</p> <p>or subsequent affordable housing needs evidence (as previous) commissions or produced by the council. Where available, wider sources relating to affordable housing need may also be considered to understand needs more local to a development proposal.</p>	To demonstrate the policy has been positively prepared to allow use of additional evidence sources to inform	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Policy H2: Affordable Housing			future affordable housing needs.	
	MM61	<p>Amend H2 (e):</p> <p>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 as set out in the national policy (20%) until such a time that the Council sets its own benchmark level supported by any up-to-date evidence, plans or strategies.</p>	<p>To be consistent with national policy referring to the 20% national requirement and effective by clarifying this position until such a time that the Council produces evidence to support a different percentage.</p>	Not significant
	MM62	<p>Amend H2 (g):</p> <p>The requirement to provide affordable housing will apply to all residential development falling under Use Class C3 Use Class C2, C3 and C4, or any subsequent amendments to the Use Classes Order, with the exception of Gypsy & Traveller Pitches or Travelling Showman Plots.</p>	<p>To be effective and demonstrate the policy has been positively prepared by providing affordable housing not just on a single use type, to meet the areas objectively assessed needs.</p>	Potential to be significant
	MM63	Add additional monitoring indicator:	To ensure plan is effective with policy being accurately	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification				Justification/ Reason for Change	Implication for SA
Policy H2: Affordable Housing		Number of people on the Council Housing Register	To ensure development schemes are addressing current affordable housing needs.	Council Housing Register		monitored, informing the need to amend implementation processes or undertake a review of the policy.	
Policy H3: Meeting the Needs of Gypsy, Traveller and Travelling Showpeople	MM64	<p>Add additional paragraph to Policy H3 as follows:</p> <p>5) 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.</p>				To be consistent with national policy providing further detailed planning permission criteria for Gypsy and Traveller and Travelling Showpeople, in relation to allowed Flood Zones.	Not significant
Policy E1: Green and Blue Infrastructure	MM65	<p>Amend para 7.2</p> <p>Recognising the importance of both protecting the existing natural environment and delivering high quality development which provides further enhancements, the policies within the Plan set out how this will be achieved over the next 15 16 years.</p>				In order that Plan is consistent with national policy, text updated to reflect period Local Plan covers.	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
	MM66	<p>Amend Policy E1 (1) as follows:</p> <p>⇒ All development must contribute towards the provision, protection and enhancement of the wider green and blue infrastructure network at a scale commensurate with the proposal.</p>	To ensure the policy will be effective.	Not significant
	MM67	<p>Amend Policy E1 (3) as follows:</p> <p>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.</p>	To ensure the policy will be effective.	Not significant
	MM68	<p>Amend paragraph 7.7 as follows:</p> <p>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.</p>	To ensure the policy will be effective.	Not significant
	MM69	<p>Amend paragraph 7.9 in the Reasoned Justification as follows:</p> <p>All development should contribute towards the provision, improvement, and maintenance of the green infrastructure network across the Borough where appropriate to do so. Whilst the Council will only expect 'major' development proposals to be designed in accordance with established, recognised green infrastructure</p>	Amendment to ensure the policy is effective and justified without reliance on future	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Policy E1: Green and Blue Infrastructure		standards, all developments can make a positive impact on the green infrastructure network and proposals will, be expected to make such provision at a scale that is commensurate with the development. Supplementary guidance will set out how development proposals on a large and small scale might assist in enhancing the green infrastructure network	supplementary documents.	
	MM70	<p>Add a new paragraph after paragraph 7.9 in the Reasoned Justification (to be 7.10 and the rest of the paragraphs subsequently renumbered) as follows:</p> <p>Simple measures and features can be incorporated into householder and minor developments that can contribute to or enhance the green infrastructure network. Cumulatively, small-scale sites already play an important role in providing and connecting the existing green infrastructure network and applicants are encouraged to consider enhancing existing green infrastructure within their development and to avoid or mitigate loss wherever possible.</p>	Amendment to provide clarity and improve the effectiveness of the policy for householder and minor developments	Potential to be significant
	MM71	<p>Amend the first bullet point in the Key Evidence as follows:</p> <p>Key Evidence</p> <ul style="list-style-type: none"> Biodiversity Opportunity Areas: the basis for realising Surrey's ecological network (Surrey Nature Partnership, 2015 2019) (available online at: Biodiversity Opportunity Areas: the Basis for Realising Surrey's Ecological Network - DocsLib) <p>Replace source link with the following link: https://surreynaturepartnership.org/wp-</p>	Editorial amendment to reference the most up to date version of the document.	Not significant

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Policy E1: Green and Blue Infrastructure		content/uploads/2019/10/boas_the-basis-for-realising-surreye28099s-ecological-network_symp_sept_2019.pdf		
Policy E2: Biodiversity	MM72	<p>Amend Policy E2 (3) as follows:</p> <p>The Council will maintain Sites of Nature Conservation Importance as shown on the Policies Map and will only permit development proposals within these sites, where there will be no adverse effect, either directly or indirectly on their ecological interest and this has been clearly demonstrated through use of appropriate assessment. Development proposals will be supported which clearly demonstrate enhancement to the value of SNCIs and where an agreed management plan is set out which shows how the enhancements will be secured for the long term.</p>	Wording added to include reference to enhancing SNCIs to improve effectiveness of the policy.	Not significant
	MM73	<p>Amend Policy E2 (5) as follows:</p> <p>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.</p>	Wording amended for succinctness and to improve effectiveness of the policy.	Not significant
	MM74	<p>Amend Policy E2 (6) as follows:</p> <p>The Council will expect developers to demonstrate full consideration of a variety of means in improving biodiversity within developments</p>	Wording added to include additional features to enhance positive impacts to	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Policy E2: Biodiversity		<p>including, but not limited to, the use of innovative approaches where appropriate such as:</p> <ul style="list-style-type: none"> • 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 	improve the effectiveness of the policy.	
	MM75	<p>Amend Policy E2 (7) as follows:</p> <p>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.</p>	Wording added to demonstrate Plan has been positively prepared by reflecting Surrey County Councils role in delivery Local Nature Recovery Strategy and to demonstrate the policy is based on appropriate evidence.	Not significant
	MM76	<p>Amend MM 68 (which amended Policy E2 (8)) to amend wording as follows:</p> <p>Amend Policy E2 (8) as follows:</p> <p>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 maximise opportunities within the Borough</p>	Amended to ensure consistent with national policy, by reflecting national guidance more clearly. The amendment also ensures the policy is effective and	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Policy E2: Biodiversity		<p>boundary and should be as close to the development site as possible following hierarchy: BNG delivery should be:</p> <ul style="list-style-type: none"> i) On site as part of the development; ii) Where on-site delivery is not feasible, then this it should be provided on land adjacent to, or as close to the development site, as possible; iii) As a last resort, net gain Off-site delivery should, where feasible and practical, be secured on land within the Borough boundary. 	deliverable by incorporating the need to keep BNG locally whilst providing reasonable flexibility and practicality in implementation.	
	MM77	<p>Amend Policy E2 (10) as follows:</p> <p>Development proposals not directly related to the management of Ramsar, and SPA, as well as SSSI units forming part of these designations will not be permitted unless it can be demonstrated that the impact of proposals, either alone or in combination, will not result in likely significant effects. 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.</p>	Amended to ensure Plan consistent with national policy by avoiding conflict with the Water Framework Directive.	Not significant
	MM78	<p>Amend paragraph 7.24 as follows:</p> <p>Development proposals should refer to any relevant Supplementary Planning Documents or Action Plans that are produced by the Council which guide on biodiversity net gain for planning applications. Additionally, nature recovery networks are to be proposed in the Local Nature Recovery Strategy for Surrey, which is currently being prepared. Once complete,</p>	Amendment to demonstrate the Plan has been positively prepared through partnership working, and to reflect Surrey County Councils role in delivery	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Policy E2: Biodiversity		development will have to take account of the LNRS when delivering biodiversity net gain and other measures/mitigation.	Local Nature Recovery Strategy and to ensure policy is based on appropriate evidence.	
	MM79	<p>Amend paragraph 7.25 as follows:</p> <p>BOAs are key areas where priority habitat can be created, improved or restored and there are two significant areas identified in Spelthorne where opportunities for restoration and creation of habitats exist:</p> <ul style="list-style-type: none"> • Staines Moor to Shortwood Common (TV03) • Shepperton to Thorpe (TV04) • River Thames (TV06) 	Wording added to reference this BOA to aid clarity and effectiveness.	Not significant
	MM80	<p>Amend the first bullet point in the Key Evidence as follows:</p> <p>Key Evidence</p> <ul style="list-style-type: none"> • Biodiversity Opportunity Areas: the basis for realising Surrey's ecological network (Surrey Nature Partnership, 2015 2019) (available online at: Biodiversity Opportunity Areas: the Basis for Realising Surrey's Ecological Network - DocsLib) <p>Replace source link with the following link: https://surreynaturepartnership.org/wp-</p>	Editorial amendment to reference the most up to date version of the document.	Not significant

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		content/uploads/2019/10/boas_the-basis-for-realising-surreye28099s-ecological-network_symp_sept_2019.pdf		
Policy E3: Managing Flood Risk	MM81	Amend wording to whole Policy E3. The final version is set out in the Addendum to the EA and SBC SoCG dated 12 Feb 2025.	To ensure the policy is effective and consistent with national policy.	Potential to be significant.
	MM82	Amend 4 (f) as follows: 4) (f) applications include appropriate flood warning and evacuation plans and site drainage systems take account of storm events and flood risk of up to 1% annual probability or 1 in 100 year event with an appropriate allowance for climate change.	Clerical error.	Not significant
	MM83	Amend Footnote 9 in Policy E3, as follows: ⁹ www.gov.uk/government/publications/personal-flood-plan and www.adeptnet.org.uk/floodriskemergencyplan	To ensure effectiveness of the policy by providing an additional reference to published guidance on flood risk emergency plans for new development.	Not significant
	MM84	Amend Footnote 10 in E3 as follows: See NPPF (2021) footnote 595 or NPPF (2024) footnote 63	To ensure the policy is consistent with national policy.	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
	MM85	<p>Monitoring Indicators:</p> <p>Indicator Number of planning decisions, including appeals, granting permission not in accordance with Policy E2 advice from the Environment Agency or Surrey CC</p> <p>Target No planning permissions that are not in accordance with Policy E2 advice from the Environment Agency or Surrey CC</p>	To allow appropriate monitoring and aid effectiveness of the policy	Not significant
Policy E4: Environmental Protection	MM86	<p>Amend Policy E4 (1) as follows:</p> <p>The Council will seek to protect and improve the Borough's air quality and work towards meeting the World Health Organisation Air Quality Guidelines by ensuring all development proposals prevent further deterioration of existing poor air quality and are "air quality neutral" as far as reasonably practicable-complies with national policy*[footnote] and guidance and the most up-to-date Air Quality Action Plan</p> <p>*[Footnote] in line with NPPF, paragraph 199.</p>	Wording amended to ensure consistent with national policy (NPPF paragraph 199).	Not significant
	MM87	<p>Amend Policy E4 (5) as follows:</p> <p>The Council will ensure all development located near ground and surface water have the appropriate measures in place to mitigate any adverse impact on water quality and water features.</p> <p>Development should not have any adverse impact on groundwater flow or quantity, nor should there be any adverse impact on groundwater quality. Planning permission will not be granted for developments which do not demonstrate the</p>	Amendment to improve effectiveness of the policy.	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Policy E4: Environmental Protection		incorporation of water efficiency measures such as water recycling and collection features. Wherever practical, Sustainable Urban Drainage Systems (SuDS) should be incorporated to minimise the discharge of surface water to the sewer system.		
	MM88	<p>Amend Policy E4 to create new sub-section on 'Odour' as follows:</p> <p>Odour</p> <p>6) 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.</p>	Amendment to improve effectiveness of the policy.	Not significant
	MM89	<p>Noise</p> <p>6) The Council will seek to protect and improve local noise conditions as far as reasonably practicable. The Council will ensure that development proposals that may generate unacceptable noise or be unreasonably impacted by noise sources incorporate appropriate attenuation measures to minimise the effects on new and existing residents. The adverse impacts of noise are to be reduced to acceptable levels through good design, layout and orientation of sites and buildings, and adequate noise insulation. In residential areas close to the airport, only one-for-one replacement of existing housing will be allowed within the 66 dB LAeq and above noise contour. The Council will require an acoustic report to accompany an application for development proposals that may be</p>	Amendment to improve effectiveness of the policy by clarifying the measured units and the frequency rating (A) used.	

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Policy E4: Environmental Protection		sensitive to noise sources, or might cause unacceptable noise for residents, businesses or the environment. Planning permission will be refused where the impact of noise cannot be mitigated to an acceptable level.		
	MM90	<p>Amend Policy E4 (7) as follows:</p> <p>Light</p> <p>7) 8) 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.</p> <p>Applicants developing proposals for lighting will be required to assess the impact of the lighting scheme and demonstrate there are no unacceptable adverse impacts. In designing new developments, consideration should be given to ensuring that the new occupiers are not adversely affected by existing sources of light pollution.</p> <p>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. Planning permission will not be granted for light generating development proposals that may have an adverse impact on residential developments, amenity, wildlife, biodiversity and highway safety. 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.</p>	Amended to ensure effectiveness of the policy.	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Policy E4: Environmental Protection	MM91	<p>Amend Policy E4 (8) as follows:</p> <p>8) 9) The Council will ensure that where development is proposed on land that may be affected by contamination, the applicant must undertake appropriate risk assessment and if necessary, remediation to ensure the development is safe or will be made safe for its intended use and should be carried out by a competent person. Through the incorporation of mitigation measures, treatment to reduce contamination or remove pollutant pathways and soil/ground gas/groundwater remediation initiatives, receptors exposure to land contamination will be minimised.</p>	Amended to ensure consistent with national policy (added to reference a competent person, as defined by the NPPF 2021, paragraph 183(c)).	Not significant
	MM92	<p>Amend Policy E4 (9) (ii) as follows:</p> <p>10)</p> <p>ii) Impose conditions on planning permissions requiring appropriate investigation and remediation of contamination before development can proceed. This will also include conditions at sites affected by land contamination to ensure verification of remediation is completed to a sufficient standard.</p>	Amended to ensure effectiveness of the policy (expanded to include additional conditions)	Not significant
	MM93	<p>Add new paragraph 7.37 as follows:</p> <p>Competent person: Able to undertake a risk assessment and any subsequent remediation strategy as set out within the NPPF para 183 (C)</p>	Amended to ensure consistent with national policy (new paragraph added to reference a competent person, as defined by the NPPF 2021, paragraph 183 (c)).	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Policy E4: Environmental Protection	MM94	<p>Amend footnote 57 in Policy E4 as follows:</p> <p>DLUHC MHCLG (2014). Land affected by contamination guidance. Available from: www.gov.uk/guidance/land-affected-by-contamination</p>	Editorial amendment.	Not significant
	MM95	<p>Amend paragraph 7.41 as follows:</p> <p>7.41-7.42 Air Quality is an important environmental issue for Spelthorne and the Council is working towards meeting the World Health Organisation Air Quality Guidelines. The Council's Air Quality Action Plan designates the whole Borough as an Air Quality Management Area (AQMA). This reflects that the whole Borough has a particular need to improve air quality therefore the Council will ensure that any new development in the Borough is consistent with the local Air Quality Action Plan and the requirements of national policy for planning decisions to sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the AQMA and cumulative impacts (NPPF 2021, paragraph 186).</p>	Amended to ensure consistent with national policy.	Not significant
	MM96	<p>7.54 Noise pollution from Heathrow Airport is of particular concern to the Council as the airport is close to major built up areas which means a large number of people in the Borough suffer noise disturbance from aircraft using the airport. Approximately, 300,000 people are affected by aircraft noise from Heathrow as defined by the 57 dB LAeq noise contour. In Spelthorne the worst affected areas are in the north of the Borough in Stanwell and Stanwell Moor.</p>	Amended to ensure consistent with national policy (to clarify the measured units and the frequency rating (A) used).	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
	MM97	Change reference within monitoring indicators from 66Leq to 66 dB LAeq.	Amended to ensure consistent with national policy (to clarify the measured units and the frequency rating (A) used.	Not significant
Policy E5: Open Space and Recreation	MM98	Amend sub heading as follows: Existing Open Space, sport and recreation facilities	Wording amended to include sports facilities and reflect Amended to ensure consistent with national policy (NPPF 2021 paragraph 99).	Not significant
	MM99	Amend Policy E5 (1) as follows: The Council will seek to protect, maintain and enhance existing open spaces, sports facilities and areas for recreation and encourage quality and accessibility improvements. Priority will be given to areas where specific deficiencies in access or quality have been identified.	Amended to ensure consistent with national policy (NPPF 2021 paragraph 99)	Not significant
	MM100	Amend Policy E5. 2. a, b and c as follows: 2)The Council will not permit the loss or displacement of existing open space to other uses unless it can be demonstrated, through up-to-date and robust evidence, that:	Amended to ensure consist with national policy.	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Policy E5: Open Space and Recreation		<p>(a) There is a proven surplus of provision and the site is no longer needed, or is unlikely to be required in the future; or</p> <p>(b) The benefit of the development to the community outweighs the harm caused by the loss of the facility; or</p> <p>(c) An alternative facility of an equal quantity and quality or higher standard will be provided in at least an equally convenient and accessible location to serve the same local community.</p> <p>2. Applications for development that would result in the loss, displacement or change of use of existing open space, sports and recreational buildings and land, including playing fields, will be determined in accordance with national policy²⁴.</p> <p>Add footnote to read ²⁴ NPPF (2024), paragraph 104</p>		
Policy EC1: Meeting Employment Needs	MM101	<p>Amend Policy EC1 paragraph 8.4 as follows:</p> <p>The study was published prior to The COVID-19 pandemic which has resulted in a change in the working patterns of many people and the extent to which these changes might become permanent is not yet clear. Some employers are likely to make more flexible or hybrid working practices permanent with smaller office spaces needed. Some occupiers are likely to be reviewing their space needs particularly in light of the financial difficulties and uncertainties businesses face around COVID-19 and BREXIT. Whilst it is too soon to quantify the impact on future need, this highlights the need for flexibility to enable businesses to adapt to meeting changing market conditions and achieve innovations. For this reason, it has been decided flexibility and frequent review is required with the floorspace needs.</p>	<p>Amendment to ensure effectiveness of the policy and to demonstrate positive preparation of the Plan using up-to-date evidence (publication of the 2022 Employment Lands Needs Assessment).</p>	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
	MM102	<p>Amend Policy EC1 (1) as follows:</p> <p>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"> • safeguarding employment land, • provision of new land floorspace 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 whilst remaining within employment use. 	Amendment to ensure effectiveness of the policy.	Not significant
	MM103	<p>Amend Policy EC1 (4) as follows:</p> <p>4. The five designated employment areas (as shown on the Policies Map that together make up the Borough's current core supply of employment land) will be protected as Strategic Employment Areas and changes of use of land and/or buildings from employment to non-employment use will be resisted. The refurbishment and redevelopment of sites in these areas for employment use and proposals for the intensification of sites for employment use will be permitted.</p> <ul style="list-style-type: none"> • Bedfont Road, Stanwell • BP, Chertsey Road, Sunbury • Hanworth Road • Shepperton Studios (is the preferred location for new film and television studio related-use)²⁵ • Windmill Road, Sunbury 	Amendment to ensure effectiveness of the policy.	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Policy EC1: Meeting Employment Needs		<p>²⁵ Shepperton Studios is not a preferred location for new office and R&D floorspace.</p>		
	MM104	<p>Amend EC1.9. as follows:</p> <p>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 evidence of marketing period will not be required</p>	Amendment to ensure effectiveness of the policy.	Not significant
	MM105	<p>Amend Policy EC1 (Monitoring Indicators, under Target) as follows:</p> <p>E (g) (i and ii): 18,372 sqm B8 (general): 12,005 sqm B2: -11,268 sqm</p>	Amendment to ensure effectiveness of the policy and to demonstrate positive preparation of the Plan using up-to-date evidence (publication of the 2022 Employment Lands Needs Assessment).	Not significant
Policy EC2: Retail	MM106	<p>Amend Policy EC2 (Key Evidence) as follows:</p> <ul style="list-style-type: none"> • National Planning Policy Framework (NPPF) 2021 • Planning Practice Guidance Town Centres and Retail • Retail and Town Centre Study 2015 • Retail and Town Centre Study Update 2018 • Annual retail survey 	Amended to ensure consist with national policy.	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Policy EC4: Leisure and Culture	MM107	<p>Amend Policy EC4 (3) as follows:</p> <p>3 (c) Applications for development that would result in the loss, displacement or change of use of major indoor sporting facilities will be determined in accordance with the latest national policy²⁶.</p> <p>²⁶ NPPF (2024) including paragraphs 98 and 104</p>	Amended to ensure consist with national policy.	Not significant
Policy ID1: Infrastructure and Delivery	MM108	<p>Amend 9.1 as follows:</p> <p>The Council is required to identify the infrastructure needed to support the development proposed over the next 15 16 years.</p>	Amended to ensure consist with national policy.	Not significant
	MM109	<p>Amend Policy ID1 paragraph 9.9 as follows:</p> <p>The planning system allows the Council to ensure that there is adequate infrastructure in place to support new development. Developers, where required, will have to demonstrate that their proposed developments incorporate adequate wastewater capacity and surface water drainage both on and off site. Where there is an infrastructure capacity constraint, the Council will require the developer to clearly set out the appropriate improvements required to facilitate the development and how this will be delivered. The planning system has mechanisms to secure timely provision such as through the imposition of Grampian-style conditions which relate to restricting development to phases.</p> <p>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</p>	Amendment to ensure effectiveness of the policy (suggested by Thames Water in their Reg 19 Representation).	Potential to be significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Policy ID1: Infrastructure and Delivery		<p>assist with identifying any potential water and wastewater network reinforcement requirements. Local network upgrades can take 18 months to 3 years to plan and deliver with strategic upgrades taking 3-5 years. 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.</p>		
	MM110	<p>Remove reference to Part 2 of the IDP from Key Evidence:</p> <ul style="list-style-type: none"> • Infrastructure Delivery Plan (including Part 2) 	Amendment to ensure Plan is justified. Part 2 of the IDP is no longer considered robust or justified evidence base.	Not significant
Policy ID2: Sustainable Transport for New Developments	MM111	<p>Amend Policy ID2 1(a) ,1(d), 1(e) as follows:</p> <ul style="list-style-type: none"> a) Provision of, or contributions towards, the improvement of public and community transport where identified as required d) providing improvements to or contributions towards improving the capacity and security of cycle parking at the Borough's public transport stations where identified as required e) providing funding to deliver the transport projects and highways improvements necessary to support the spatial strategy as set out in the Infrastructure Delivery Plan (forthcoming) where identified as required 	Amendment to ensure effectiveness of the policy (certain provisions will be expected only where they are demonstrated as necessary).	Not significant
Policy ID2: Sustainable Transport for	MM112	Amend Policy ID2 1(b) to include a footnote as follows:	Amendment to ensure effectiveness of the	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
New Developments		<p>1)(b) provision of vehicle parking standards, as set out in the Council's latest Parking SPD [footnote], and the provision of electric vehicle charging points which are set out in the latest Surrey County Council guidance;</p> <p>[footnote] A reduction of parking requirements may be appropriate in specific situations, in locations with good access to public transport and local services. Any proposed reduction will be assessed against criteria including:</p> <ul style="list-style-type: none"> a. Distance from public transport node i.e. main railway station, bus station, main bus stop; b. Frequency and quality of train service; c. Frequency and quality of bus service; d. Availability and quality of pedestrian and cycle routes; e. In line with Surrey County Council Car Club Guidance, car clubs will be encouraged for developments of 50 or more residential units. 	policy by providing clarity and further detail on parking provision.	
	MM113	<p>Amend Policy ID2 1(d), 1(f), 2(c), definitions as follows:</p> <p>Public Transport Interchange Stations</p>	Amendment to ensure effectiveness of the policy by providing clarity.	Not significant
	MM114	<p>Amend Policy ID2 1(e) as follows:</p> <p>Providing funding to deliver the transport projects and highways improvements required to support the spatial strategy as set out in the Infrastructure Delivery Plan (forthcoming);</p>	Editorial amendment.	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Policy ID2: Sustainable Transport for New Developments	MM115	<p>Amend Policy ID2 1(f) as follows:</p> <p>f) providing a transport assessment and travel plan for all major development proposals likely to generate significant amounts of transport movement to promote the delivery and use of sustainable transport. The Travel Plan should set out how it will facilitate the use of sustainable and active transport modes, including but not limited to; low emission car clubs, low emission employee shuttle bus schemes supporting public bus schemes or offering discounted season tickets between public transport interchanges and employment areas</p>	<p>Amendment to ensure effectiveness of the policy by providing flexibility to ensure applicants produce proportionate evidence.</p> <p>To ensure consist with national policy.</p>	Potential to be significant
	MM116	<p>Amend paragraph 9.15 as follows:</p> <p>The Council will work with stakeholders and Surrey County Council as part of the forthcoming Infrastructure Delivery Plan, which will set out the key infrastructure required to support the delivery of the Local Plan, including sustainable transport and highway schemes. Growth over the Plan period will give rise to increased traffic volumes and it is therefore required that this be mitigated as far as possible. The policy sets out the measures by which the Council will seek to militate against the impacts and will require new developments to adopt the relevant standards to achieve this. 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</p>	<p>Amendment to ensure effectiveness of the policy by providing clarity.</p>	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Policy ID2: Sustainable Transport for New Developments		<p>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.</p>		
	MM117	<p>Amend Policy ID2 paragraph 9.17 as follows:</p> <p>All major developments require the submission of a Transport Assessment and Travel Plan. All developments likely to generate significant amounts of transport movement are required to submit a Transport Assessment and Travel Plan.</p> <p>These documents set out the potential transport impacts of the proposals, how these will be addressed and how sustainable travel will be delivered in the long term. There may be occasions where smaller developments have lower impacts and therefore a Transport Statement may be necessary unless it can be demonstrated to the satisfaction of the Council that the changes are minor. Such assessments will be subject to liaison between the Council and the highway authority or authorities.</p>	<p>Amendment to ensure effectiveness of the policy by providing flexibility to ensure applicants produce proportionate evidence.</p> <p>To ensure consist with national policy.</p>	Potential to be significant
	MM118	<p>Amend Policy ID2 (Key Evidence) as follows:</p> <p>Key evidence</p> <ul style="list-style-type: none"> • Spelthorne Borough Council Local Plan Strategic Highway Assessment Report (Surrey County Council, 2019) • Strategic Highways Assessment Report (Surrey County Council, 2022) • Spelthorne Local List of Information Requirements (2015) 	<p>Editorial amended to reflect the updated and superseded 'Vehicle, Cycle and Electric Vehicle Parking Guidance for New Development' by</p>	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
		<ul style="list-style-type: none"> • Vehicular and Cycle Parking Guidance (Surrey CC, 2018) • Vehicle, Cycle and Electric Vehicle Parking Guidance for New Development (SCC, 2022) 	Surrey County Council.	
Allocations	MM119	<p>Remove site-specific wording: • 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.</p> <p>and add Footnote: Refer to Policy ID2 in regard to sustainable transport for new developments to sites: AE3/006, AS1/001, AS1/003, AS1/011, AS2/006, AT1/002, AT1/012, AT3/007, AT3/009, AT3/016, HS1/002, HS1/009, HS1/012, HS1/012b, HS2/004, LS1/024, RL1/011, SC1/006, SC1/013, SC1/019, SC1/021, SE1/003, SE1/005, SE1/008, SE1/020, SE1/024, SE1/025, SH1/010, SH2/003, SN1/005, SN1/006, SN1/012, ST1/028, ST1/031, ST1/037, ST1/043, ST2/006, ST3/004, ST3/012, ST3/014, ST4/004, ST4/009, ST4/019, ST4/023, ST4/024, ST4/025, ST4/026, ST4/028</p>	<p>Amendment to demonstrate the Plan is positively prepared and ensure policy is effective, by removing requirements for site specific travel plans and transport assessment which go beyond the requirements of ID2. Consistent with national policy, ID2 sets out the sustainable transport requirements for new developments. Supporting the deliverability of sites to meet areas objectively assessed needs.</p> <p>Not significant</p>	
Allocations				

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Allocations	MM120	<p>Add a final bullet point in Site-specific requirements to sites: AT1/002, AT3/016, LS1/024, SE1/024, SN1/006, ST1/037, ST3/004, ST4/019, ST4/026, AE3/006, AS1/001, SC1/006, ST3/014, ST4/004, ST4/023, SC1/021, SE1/003, SN1/005, SN1/012, ST2/006, ST3/012, ST4/009 as follows:</p> <p>Applicants are encouraged to develop the detailed design of the site in collaboration with the LPA. Use of a Design Review Panel will be encouraged where it is considered that it can positively shape development.</p>	<p>Amendment to ensure effectiveness of the policy.</p> <p>Context for inclusion in allocations of 75+ dwellings can be found at MM29 (Policy PS2)</p>	Not significant
	MM121	<p>Add</p> <p>The site will not be available for development until a safe route for access and egress can be provided and maintained during a flood event (i.e. the 1% AEP fluvial flood event and surface water event including an appropriate climate change allowance) to site-specific requirements for Site Allocations ST4/004, ST4/019, ST4/023, ST4/024, ST4/025, ST4/026, ST4/028, SH1/015, SH1/010, SH2/003, ST1/028.</p>	<p>Amendment to ensure consistent with national policy and effective by setting out the site allocations that are at risk from access and egress flooding issues and requirements (as agreed in Statement of Common Ground with Environment Agency).</p>	Potential to be significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Allocations Years 1-5	MM122	Amend timeframe dates 2023-2027 2024-2028 for AS1/011, AS2/006, AT1/002, AT1/012, AT3/007, HS1/002, HS1/009, HS1/012, HS2/004, LS1/024, SE1/005, SE1/024, SN1/006, ST1/037, ST1/043, ST3/004	Amendment to ensure consistent with national policy.	Not significant
	MM123	<p>Add In order to ensure that future development does not increase the risk of flooding to the surrounding areas, the built footprint of the new development should not exceed that of the existing building and where possible should be reduced. The site layout will be required to be designed to ensure development is set back from the River Ash to Site-specific requirements for AT1/012.</p>	Amendment to ensure consistent with national policy and effective by adding specific wording regarding site layout and built footprint, in reference to the flood risk issue (as agreed in Statement of Common Ground with Environment Agency).	Potential to be significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Allocations Years 1-5	MM124	<p>Add Within the area which falls within flood zone 3a (1% AEP), the built footprint of the new development should not exceed that of the existing building and where possible should be reduced. The site layout will be required to be designed to ensure all development is able to access the safe route for access and egress (shown within the SFRA Level 2) during a flood event (i.e. the 1% AEP fluvial flood event and surface water event including an appropriate climate change allowance) to Site-specific requirements for ST1/037.</p>	<p>Amendment to ensure consistent with national policy and effective by adding wording regarding site layout and built footprint, in reference to the flood risk issue (as agreed in Statement of Common Ground with Environment Agency).</p>	Potential to be significant
	MM125	<p>Amend HS1/012: Proposed allocation: Residential C3: 60 units 70 units (approx.)</p>	<p>Amendment to ensure policy is effective and positively prepared by updating the number of units in proposed allocation to reflect latest housing trajectory updated since submission.</p>	Not significant
	MM126	<p>Remove from HS1/012:</p> <ul style="list-style-type: none"> • 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 	<p>Amendment to ensure policy is effective by removing text relating to Sixth</p>	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Allocations Years 1-5		agreed with the Council as part of the application process	Form clarifying the education use relates to HS1/012b only ensuring deliverability of site.	
	MM127	Move Site HS1/012b (Land East of Upper Halliford Road) from Years 6-10 to Years 1-5 and amend: Delivery Timeframe 2028-2032 (years 6-10) 2024-2028 (years 1-5)	Amendment to be consistent with national policy, positively prepared and will be effective by reflecting latest housing trajectory and updated Statement of Common Ground.	Not significant
	MM128	Amend HS1/012b site specific requirement: The Provision of a for new sixth form college facilities supported by the provision of approximately 20 houses to enable the education provision development.	Amendment to ensure policy is effective by ensuring the sixth form provision can be provided in a flexible manner through a range of different options in the development management process.	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Allocations Years 1-5	MM129	Move Site AS1/003 (Former Staines Fire Station, Town Lane) from Years 11-15 to Years 1-5 and amend: Delivery Timeframe 2028-2032 (years 6-10) 2024-2028 (years 1-5)	Plan period updated to be consistent with national policy, positively prepared and effective by reflecting latest housing trajectory and updated Statement of Common Ground.	Not significant
	MM130	Move Site SC1/019 (Sunbury Social Services Centre, Vicarage Road) from Years 6-10 to Years 1-5 and amend: Delivery Timeframe 2033-2037 (years 11-15) 2024-2028 (years 1-5)	Amendment to be consistent with national policy, positively prepared and effective by reflecting latest housing trajectory and updated Statement of Common Ground.	Not significant
	MM131	Move Site SE1/020 (Sunbury Adult Education Centre, The Avenue) from Years 6-10 to Years 1-5 and amend: Delivery Timeframe 2033-2037 (years 11-15) 2024-2028 (years 1-5)	Amendment to be consistent with national policy, positively prepared and effective by reflecting latest housing trajectory and updated	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
	MM132	Move Site SE1/025 (Elmbrook House, Station Road) from Years 6-10 to Years 1-5 and amend: Delivery Timeframe 2033-2037 (years 11-15) 2024-2028 (years 1-5)	Statement of Common Ground.	
	MM133	Remove Site ST4/002 (Bridge Street Car Park, Hanover House & Sea Cadet Building, Bridge Street, Staines)	Amendment to be consistent with national policy, positively prepared and effective by reflecting latest housing trajectory and updated Statement of Common Ground.	Not significant
Allocations Years 6-10	MM134	Amend timeframe dates 2028-2032 2029-2033 for AE3/006, AS1/001, RL1/011, SC1/006, ST3/014, ST4/004, ST4/023, ST4/024	Amendment to be consistent with national policy.	Not significant
	MM135	Remove Site ST1/029 (Fairways Day Centre, Knowle Green, Staines)	Amendment to be consistent with national policy and	Not significant – removal of allocation

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Allocations Years 6-10			will be effective by removing the site due to flood risk issues. As agreed in Statement of Common Ground with Environment Agency.	See paragraph 6.1 below.
	MM136	Remove Site ST1/030 (Surrey County Council Buildings, Burges Way, Staines)	Amendment to be consistent with national policy and will be effective by removing the site due to flood risk issues. As agreed in Statement of Common Ground with Environment Agency.	Not significant – removal of allocation See paragraph 6.1 below.
	MM137	Remove Site ST4/010 (Riverside Car Park, Thames Street, Staines)	Amendment to be consistent with national policy and will be effective by removing the site due to flood risk issues. As agreed in Statement of Common Ground	Not significant – removal of allocation See paragraph 6.1 below.

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Allocations Years 6-10			with Environment Agency.	
	MM138	Remove Site ST4/011 (Thames Lodge Hotel, Thames Street, Staines)	Amendment to be consistent with national policy and will be effective by removing the site due to flood risk issues. As agreed in Statement of Common Ground with Environment Agency.	Not significant – removal of allocation. See paragraph 6.1 below.
	MM139	Move Site ST4/019 (Former Debenhams Site, High Street) from Years 1-5 to Years 6-10 and amend: Delivery Timeframe 2023-2037 (years 1-5) 2029-2033 (years 6-10)	Amendment to be consistent with national policy and effective by reflecting the site will not be available until later when a safe route for access and egress can be provided and maintained during a flood event. As agreed in Statement of Common Ground with Environment Agency.	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
Allocations Years 6-10	MM140	Move Site AS2/001 (Ashford Youth Club, Kenilworth Road) from Years 11-15 to Years 6-10 and amend: Delivery Timeframe 2033-2037 (years 11-15) 2029-2033 (years 6-10)	Amendment to be consistent with national policy, positively prepared and effective by reflecting latest housing trajectory and updated Statement of Common Ground.	Not significant
	MM141	Move Site AT3/016 (23-31 (not 11-19) Woodthorpe Road) from Years 1-5 to Years 6-10 and amend: Delivery Timeframe 2023-2027 (years 11-15) 2029-2033 (years 6-10)	Amendment to be consistent with national policy, positively prepared and effective by reflecting latest housing trajectory and updated Statement of Common Ground	Not significant
	MM142	For proposed policy wording for Site Allocation SC1/021	Due to the nature of regeneration schemes, a separate Statement of Common Ground has been agreed for the site. Amendment to ensure allocation	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
			will be effective and that the Plan has been positively prepared.	
	MM143	For proposed policy wording for Site Allocation SN1/012	Due to the nature of regeneration schemes, a separate Statement of Common Ground has been agreed for the site. Amendment to ensure allocation will be effective and that the Plan has been positively prepared.	Not significant
	MM144	<p>Add</p> <p>In order to ensure that future development does not increase the risk of flooding to the surrounding areas, the built footprint of the new development should not exceed that of the existing building and where possible should be reduced. The site layout will be required to be designed to ensure all development is able to access the safe route for access and egress (shown within the SFRA Level 2) during a flood event (i.e. the 1% AEP fluvial flood event and surface water event including an appropriate climate change allowance). to Site-specific requirements for ST4/009</p>	Amendment to ensure consistent with national policy and effective by adding specific wording regarding site layout and built footprint, in reference to the flood risk issue (as agreed in Statement of Common Ground	Potential to be significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
			with Environment Agency).	
Allocations Years 11-16	MM145	Update Title: Years 11-15 (2033-2037) Years 11-16 (2034-2039)	Amendment to be consistent with national policy.	Not significant
	MM146	Amend timeframe dates 2033-2037 (years 11-15) 2034-2039 (years 11-16) for AT3/009, SC1/013, SE1/003, SE1/008, SH1/015, SH2/003, SN1/005, ST1/031, ST2/006, ST3/012, ST4/009.	Amendment to be consistent with national policy.	Not significant
	MM147	Move Site SH1/010 (Shepperton Library, High Street) from Years 6-10 to Years 11-15 and amend Delivery Timeframe 2028-2032 (years 6-10) 2034-2039 (years 11-16)	To be consistent with national policy, justified by evidence and effective the plan period updated to reflect the site will not be available until later when a safe route for access and egress can be provided and maintained during a flood event. As agreed in Statement of Common Ground with Environment Agency.	Not significant
Allocations Years 11-16	MM148	Move Site ST1/028 (Leacroft Centre, Leacroft, Staines) from Years 6-10 to Years 11-15 and amend Delivery Timeframe 2028-2032 (years 6-10) 2034-2039 (years 11-16)	To be consistent with national policy, justified by evidence	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
			and effective the plan period updated to reflect the site will not be available until later when a safe route for access and egress can be provided and maintained during a flood event. As agreed in Statement of Common Ground with Environment Agency.	
Allocations Years 11-16	MM149	Move Site ST4/026 (Communications House, South Street, Staines) from Years 1-5 to Years 11-15 and amend Delivery Timeframe 2023-2037 (years 1-5) 2034-2039 (years 11-16)	To be consistent with national policy, justified by evidence and effective the plan period updated to reflect the site will not be available until later when a safe route for access and egress can be provided and maintained during a flood event. As agreed in Statement of Common Ground	Not significant

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Implication for SA
	MM150	Move Site ST4/028 (William Hill/ Vodafone/Monsoon, High Street) from Years 1-5 to Years 11-15 and amend Delivery Timeframe 2023-2037 (years 1-5) 2034-2039 (years 11-16)	with Environment Agency.	
New section: 11. Monitoring	MM151	Insertion of a table of all the monitoring indicators within the Plan and the corresponding policy reference. This will include the Indicator(s), Target(s) and Data source(s). Removal of these monitoring indicator tables from the end of each of the policies.	To be consistent with national policy, justified by evidence and effective the plan period updated to reflect the site will not be available until later when a safe route for access and egress can be provided and maintained during a flood event. As agreed in Statement of Common Ground with Environment Agency.	Not significant

6. Re-appraised Policies

Figure 2: Sustainability Appraisal Scoring Matrix

++	Significant positive contribution towards sustainability
+	Positive contribution towards sustainability
0	Likely to be neutrally or not significantly affected, or some impacts likely to be + and some -
-	Negative contribution towards sustainability
--	Significant negative contribution towards sustainability
?	It is unclear whether there is the potential for a negative or positive effect on the SA Objective.
S	Short term impact (next 5 years)
M	Medium term impact (next 6-10 years)
L	Long term impact (11+ years)

MM10/ MM11 - Policy ST2: Planning for the Borough

SA Objective and Impact (temporal – short/medium/long term)												Conclusions	Mitigation
1. Housing	2. Health	3. Flood risk	4. Land and Soil	5. Pollution	6. Biodiversity	7. Heritage	8. Open space and landscape.	9. Transport	10. Economic Dev.	11. Climate Change	12. Water		
+(L)	+	-	0 (L)	?	0	0	0	+	+	?	?	The increase in Local Housing Need from 618 to 631 per annum would likely impact housing provision. This in turn could put strain on the environment and increase land use. Increased housing provision would likely positively impact housing and health objectives, as well as improving the opportunity for supporting infrastructure and active travel opportunities.	Development sites should ensure design does not negatively impact flood risk. Impacts may be minimised through sustainable construction, permeable surfaces, sensitive design and sustainable travel measures.

MM17 - ST3: Local Plan Immediate Review policy

SA Objective and Impact (temporal – short/medium/long term)												Conclusions	Mitigation
1. Housing	2. Health	3. Flood risk	4. Land and Soil	5. Pollution	6. Biodiversity	7. Heritage	8. Open space and landscape.	9. Transport	10. Economic Dev.	11. Climate Change	12. Water		
+(S)	+(S)	0	?	?	?	?	?	+	+(S)	?	?	Many of the effects are uncertain since a review may result in different levels or locations of development provision, however the ambition to meet needs	Consideration of environmental impacts as a result of potential future development levels will help to offset any negative impacts that could arise as a

MM27 - PS2: Designing Places and Spaces

SA Objective and Impact (temporal – short/medium/long term)															
1. Housing	2. Health	3. Flood risk	4. Land and Soil	5. Pollution	6. Biodiversity	7. Heritage	8. Open space and landscape.	9. Transport	10. Economic Dev.	11. Climate Change	12. Water	Conclusions		Mitigation	
0	+(L)	0	+	+	+	++(L)	+	+	0	+	0	The introduction of MM27 and the requirement to develop collaboratively between the applicant and the local planning authority (LPA) and encourages use of a Design Review Panel where it can positively shape development is considered to have significant positive impacts on heritage and the townscape. This additional element of the policy seeks to improve cooperation on design and will facilitate	No further mitigation identified.		

														a cohesive and positive character for the borough.	
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MM31 - Policy SP1: Staines-upon-Thames

SA Objective and Impact (temporal – short/medium/long term)														Conclusions	Mitigation
1. Housing	2. Health	3. Flood risk	4. Land and Soil	5. Pollution	6. Biodiversity	7. Heritage	8. Open space and landscape.	9. Transport	10. Economic Dev.	11. Climate Change	12. Water				
++ (L)	+	0	+	0	+	(M/L)	+	(M/L)	+	+	+	+	?	Impacts on the SA objectives are generally positive however the removal of the reference to the Staines Development Framework may limit the ability to plan holistically to a degree, and removal of zoning heights may lead to an increased level of development to help meet housing needs, potentially in more sensitive areas. Reference has been added to the National Model Design Code which could help to offset any changes in scoring however character might be at risk of changing. Removal of the SDF references may impact local character and may lead to a rise in development heights with the absence of zoning, however the policy has been strengthened with references to design code, landscaping and SuDs.	Mitigation could include sustainable construction, energy efficiency measures and sustainable transport links. Infrastructure provision should also be strengthened. Removal of the SDF may have knock on effects in terms of character and holistic planning therefore the plan should seek to ensure that development character makes a positive contribution to the area.

MM47/MM54 - Policy H1: Homes for All

SA Objective and Impact (temporal – short/medium/long term)												Conclusions	Mitigation
1. Housing	2. Health	3. Flood risk	4. Land and Soil	5. Pollution	6. Biodiversity	7. Heritage	8. Open space and landscape.	9. Transport	10. Economic Dev.	11. Climate Change	12. Water		
++ (M/L)	+	0	0 (L)	0	0	0	0	0	+	0	0	The policy will promote positive impacts for occupants of new homes. Largely positive impacts particularly for occupants of the new homes and seeks to boost inclusivity. The increase in Local Housing Need to 631 per annum will likely have a positive impact on housing provision in the medium to long term. There may however be strain on the environment and increased land use with more housing provision.	Prioritisation of previously developed land and biodiversity net gain as well as design specific measures to address any negative impacts on the environment.

MM62 - Policy H2: Affordable Housing

SA Objective and Impact (temporal – short/medium/long term)												Conclusions	Mitigation
1. Housing	2. Health	3. Flood risk	4. Land and Soil	5. Pollution	6. Biodiversity	7. Heritage	8. Open space and landscape.	9. Transport	10. Economic Dev.	11. Climate Change	12. Water		
++ (L)	++ (L)	0	0	0	0	0	0	0	0	0	0	The broadening of affordable housing requirements to use classes C2, C3 and C4, or any subsequent amendments to the Use Classes Order will help to increase affordable housing	Policy takes account of viability and also includes a review mechanism to boost affordable housing provision. Legal agreements should be utilised to ensure provision is secured.

provision and have positive impacts on the quantum health by meeting needs more widely and reducing exclusion.

MM70 - Policy E1: Green and Blue Infrastructure

SA Objective and Impact (temporal – short/medium/long term)													
1. Housing	2. Health	3. Flood risk	4. Land and Soil	5. Pollution	6. Biodiversity	7. Heritage	8. Open space and landscape.	9. Transport	10. Economic Dev.	11. Climate Change	12. Water	Conclusions	Mitigation
0	+	0	+	+	(M/ L) +	0	+	0	0	+	+	The clarification that all development should contribute to green and blue infrastructure with the addition of MM70 provides the opportunity to significantly positively impact biodiversity, particularly cumulatively over time as more development schemes come forward.	Where development utilises greenfield land, or sites in close proximity, opportunities should be sought to improve connectivity between sites and support biodiversity corridors.

MM81 - Policy E3: Managing Flood Risk

SA Objective and Impact (temporal – short/medium/long term)												Conclusions	Mitigation
1. Housing	2. Health	3. Flood risk	4. Land and Soil	5. Pollution	6. Biodiversity	7. Heritage	8. Open space and landscape.	9. Transport	10. Economic Dev.	11. Climate Change	12. Water	Conclusions	Mitigation
0	+	+	0	0	+	0	+	0	+	+	+	This policy seeks to reduce flood risk and positively impact the environment. Support for the River Thames Scheme	In areas at risk of flooding, or on any other proposal where safe access/egress cannot be achieved, suitable flood risk

1. Housing	2. Health	3. Flood risk	4. Land and Soil	5. Pollution	6. Biodiversity	7. Heritage	8. Open space and landscape.	9. Transport	10. Economic Dev.	11. Climate Change	12. Water	has positive impacts on biodiversity, open space and economic development. Since submission of the Local Plan, the policy has strengthened its reference to SuDs measures to alleviate flood risk and reduce surface water run-off. Overall the policy is expected to have positive impacts and has been strengthened in support. This policy should make homes and communities more resistant and/or resilient to flooding. The policy resists development in areas of flood risk, which will be important in delivering against a number of SA objectives. The policy may hinder development which would generate economic benefit but the policy provides clear criteria for the circumstances in which development in areas of flood risk will be considered acceptable and prioritises safety	mitigation and management plans must be submitted. The policy has strengthened its requirements for flood risk protection measures and in consultation with the Environment Agency, has led to site-specific requirements for sites most vulnerable to flooding.
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MM109 - Policy ID1: Infrastructure and Delivery

SA Objective and Impact (temporal – short/medium/long term)												Conclusions	Mitigation											
1. Housing	2. Health	3. Flood risk	4. Land and Soil	5. Pollution	6. Biodiversity	7. Heritage	8. Open space and landscape.	9. Transport	10. Economic Dev.	11. Climate Change	12. Water													
+	+	+	0	+ (S/M)	0	0	+	++	+	+	+	The change in policy to require wastewater and water network capacity to be in place ahead of the occupation of development will help to facilitate updates and delivery in a timely manner. This will likely have improved												No further mitigation identified.

														positive impact on water and pollution objectives in the short medium and long term, as well as cumulative positive impacts owing to improved scheduling of supporting infrastructure.	
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MM115/MM117 - Policy ID2: Sustainable Transport for New Developments

SA Objective and Impact (temporal – short/medium/long term)												Conclusions	Mitigation
1. Housing	2. Health	3. Flood risk	4. Land and Soil	5. Pollution	6. Biodiversity	7. Heritage	8. Open space and landscape.	9. Transport	10. Economic Dev.	11. Climate Change	12. Water		
0	+	0	0	+	0	0	0	+	+	+	0	The change to the policy from 'all major development' to 'all developments likely to generate significant amounts of transport movement are required to submit a Transport Assessment and Travel Plan' will help provide proportionate evidence, but may have negative impacts on the number of transport assessments produced and subsequently on transport objectives, should there be less focus and a reduced opportunity for mitigation. Overall impacts are still positive on transport and health objectives but smaller schemes may contribute less positive impacts overall.	Seeking opportunities for transport benefits (of all kinds) early in the planning process will help to offset negative impacts.

MM121 - Site-specific requirements for Site Allocations ST4/004, ST4/019, ST4/023, ST4/024, ST4/025 , ST4/026, ST4/028, SH1/015, SH1/010, SH2/003, ST1/028

	SA Objective and Impact (temporal – short/medium/long term)													
	1. Housing	2. Health	3. Flood risk	4. Land and Soil	5. Pollution	6. Biodiversity	7. Heritage	8. Open space and landscape.	9. Transport	10. Economic Dev.	11. Climate Change	12. Water	Conclusions	Mitigation
ST4/004	+	+	0	+	-	0	-	0	++	-	0	-	The policy update for sites not to be available or development until a safe route for access and egress can be provided and maintained will help to reduce flood risk and improve health impacts. Potential minor negative impacts on housing provision in the short term if sites cannot come forward sooner.	Consideration of engineering schemes to overcome flood risk early in the planning process will help to speed up the planning and delivery process so as to not delay housing provision.
ST4/019	++	+	0	++	-	0	-	0	++	+	0	-		
ST4/023	++	+	0	++	-	0	-	0	++	-	0	-		
ST4/024	+	+	0	+	-	0	-	0	++	-	0	-		
ST4/025	+	+	0	-	-	0	0	0	0	+	0	-		
ST4/026	+	+	0	++	-	0	0	0	++	-	0	-		
ST4/028	+	+	0	+	0	0	0	0	++	+	0	-		
SH1/015	++	+	0/+	+	0	0	0	0	+	+	0	-		
SH1/010	++	+	0/+	+	0	0	0	0	+	+	0	-		
SH2/003	++	+	0/+	+	0	0	0	0	+	+	0	-		

	SA Objective and Impact (temporal – short/medium/long term)													
	1. Housing	2. Health	3. Flood risk	4. Land and Soil	5. Pollution	6. Biodiversity	7. Heritage	8. Open space and landscape.	9. Transport	10. Economic Dev.	11. Climate Change	12. Water	Conclusions	Mitigation
ST1/028	++	+	0	+	0	0	0	0	+	+	0	-	The policy update for sites not to be available or development until a safe route for access and egress can be provided and maintained will help to reduce flood risk and improve health impacts. Potential minor negative impacts on housing provision in the short term if sites cannot come forward sooner.	Consideration of engineering schemes to overcome flood risk early in the planning process will help to speed up the planning and delivery process so as to not delay housing provision.

MM123 - AT1/012

SA Objective and Impact (temporal – short/medium/long term)													
1. Housing	2. Health	3. Flood risk	4. Land and Soil	5. Pollution	6. Biodiversity	7. Heritage	8. Open space and landscape.	9. Transport	10. Economic Dev.	11. Climate Change	12. Water	Conclusions	Mitigation
++	+	0	0	-	0	0	0	+	+	0	-	The addition to the allocation policy for the built footprint of new development not to exceed the existing, and where possible reduce it, will help to ensure flood risk does not increase for surrounding areas, thus reducing the negative impacts of development on	Suitable scheme design and appropriate flood risk mitigation will help to reduce any negative impacts on flooding and the environment.

flood risk policies. This is also expected to have minor knock on positive effects for health and environmental objectives.

MM123 - ST1/037

SA Objective and Impact (temporal – short/medium/long term)													
1. Housing	2. Health	3. Flood risk	4. Land and Soil	5. Pollution	6. Biodiversity	7. Heritage	8. Open space and landscape.	9. Transport	10. Economic Dev.	11. Climate Change	12. Water	Conclusions	Mitigation
++	+	0	++	-	0	0	0	++	+	0	-	The addition to the allocation policy for the built footprint of new development not to exceed the existing, and where possible reduce it, will help to ensure flood risk does not increase for surrounding areas, thus reducing the negative impacts of development on flood risk policies. This is also expected to have minor knock-on positive effects for health and environmental objectives. The policy update for the site not to be available for development until a safe route for access and egress can be provided and maintained will help to reduce flood risk and improve health impacts. Potential minor negative impacts on housing provision in the short term if sites cannot come forward sooner.	Suitable scheme design and appropriate flood risk mitigation will help to reduce any negative impacts on flooding and the environment. Consideration of engineering schemes to overcome flood risk early in the planning process will help to speed up the planning and delivery process so as to not delay housing provision.

MM144 - ST4/009

SA Objective and Impact (temporal – short/medium/long term)												Conclusions	Mitigation
1. Housing	2. Health	3. Flood risk	4. Land and Soil	5. Pollution	6. Biodiversity	7. Heritage	8. Open space and landscape.	9. Transport	10. Economic Dev.	11. Climate Change	12. Water		
++	+	0	++	-	0	-	0	++	+	0	-	The addition to the allocation policy for the built footprint of new development not to exceed the existing, and where possible reduce it, will help to ensure flood risk does not increase for surrounding areas, thus reducing the negative impacts of development on flood risk policies. This is also expected to have minor knock-on positive effects for health and environmental objectives. The policy update for the site not to be available or development until a safe route for access and egress can be provided and maintained will help to reduce flood risk and improve health impacts. Potential minor negative impacts on housing provision in the short term if sites cannot come forward sooner.	Suitable scheme design and appropriate flood risk mitigation will help to reduce any negative impacts on flooding and the environment. Consideration of engineering schemes to overcome flood risk early in the planning process will help to speed up the planning and delivery process so as to not delay housing provision.

6.1 MM133, MM135, MM136, MM137, MM138 all remove allocations from the Local Plan. Whilst impacts are not expected to be significant owing to the identification of alternative development sites in the housing trajectory, there is potential for negative impacts on overall housing provision and housing/health objectives due to the loss of development sites. There are however positive impacts expected on the environment and flooding objectives due to the removal of sites at risk of flooding.

7. Conclusion

- 7.1 Each modification has been assessed for its possible impact upon the outcomes determined through the Sustainability Appraisal carried out for the Publication (Regulation 19) Local Plan. In most cases, Main Modifications are general updates, clarifications and consequential changes, and in these cases it is considered that there is no need to review the Sustainability Appraisal because there is no material change to the policy. Nonetheless, a number of amendments do introduce elements that would potentially alter the performance of policy against Sustainability Appraisal objectives – in these cases, the policies have been re-appraised. These impacts largely relate to the redrafting of policies SP1: Staines upon Thames, ST3: Immediate Review policy and E3: Managing Flood risk, along with consequential changes recommended by the Environment Agency to reduce flood risk.
- 7.2 The assessment of the proposed Main Modifications found that there would be no significant negative effects against the sustainability objectives in the SA, with many neutral or positive effects being identified.
- 7.3 Upon re-appraisal, the Main Modifications were considered to relate only to certain aspects of the implementation of the policies and as such did not massively alter the scoring and broad performance of policy scenarios against any of the 12 sustainability appraisal objectives, with mostly improved positive impacts identified.
- 7.4 The main modifications therefore do not significantly alter the overall findings of the SA of the Publication Plan (Regulation 19) Report (May 2022) in terms of delivering positive sustainability outcomes, with a number of amendments to give greater clarity and improvements provided.

Appendix A: Sustainability Appraisal Framework

Objective	Decision Aiding Questions	Indicators	NPPF Theme
1. To provide sufficient high-quality housing to enable people to live in a home suitable to their needs and which they can afford.	<p>Will it provide housing to help meet identified needs?</p> <p>Will it reduce the number of unfit homes?</p> <p>Will it improve affordability?</p> <p>Will it provide specialist accommodation for elderly/disabled persons?</p> <p>Have a significant detrimental effect on the financial viability of delivering future housing?</p>	<p>Total housing completions by size, type and tenure.</p> <p>Number of households on the housing register.</p> <p>Plot requirements on the self-build register.</p> <p>Lower quartile property price compared against lower quartile workplace earnings.</p>	<p>Social – providing the supply of housing required to meet the needs of present and future generations.</p> <p>Economic – construction industry and building strong economy. High quality residential areas also create attractive areas for businesses to locate to.</p> <p>Environmental – provision of housing in suitable and sustainable locations will help to preserve the remainder of the natural environment.</p>
2. To facilitate the improved health and well-being of the whole population and reduce inequalities.	<p>Will it improve access to or provide healthcare and/or cultural and community facilities?</p> <p>Will it help to meet Accessible Natural Greenspace standards (ANGst)?</p> <p>Will it improve access to or provide green/blue infrastructure/ leisure/ recreation facilities?</p> <p>Will it improve highway safety for road users, cyclists and pedestrians?</p> <p>Will it contribute toward a safe & secure built environment?</p> <p>Will it help to address pockets of deprivations and child poverty?</p>	<p>Percentage of people whose health is classed as not good.</p> <p>Life expectancy Adult & child obesity levels.</p> <p>IMD Health Rankings</p> <p>Motorists/pedestrian/cyclists – number killed and/or seriously injured (KSI) per 100,000 population.</p> <p>Amount and quality of green infrastructure/recreation space by type (ha) or leisure facilities.</p> <p>Accessibility to Hospitals & GP Surgeries.</p> <p>Capacity of Health Facilities.</p>	<p>Social – the objective will assist in supporting strong, vibrant, inclusive, safe and healthy communities.</p> <p>Environmental – The facilitation of healthy and active lifestyles and open space provision will have positive impacts on the environment, resource use and enhance local green and blue infrastructure networks.</p>

Objective	Decision Aiding Questions	Indicators	NPPF Theme
	Will it reduce recorded levels of crime and fear of crime? Will it encourage healthy lifestyles?	Accessible Natural Greenspace (ANGst) Targets. Indices of Multiple Deprivation (IMD). Number of developments implementing 'Secured by Design'.	
3. To increase resilience to, reduce the risk of, and minimising the harm from flooding	Will it reduce the number of properties at risk from all forms of flooding? Will it reduce the severity of a flood event? Will it increase the number of properties linked to sustainable drainage systems (SuDS)?	Number of properties at risk from flooding. Number of properties with flood mitigation installed. Number of properties built with SuDS installed.	Economic – CC resilient infrastructure will help to future proof businesses and make more resilient Social – maintain a healthy community/ wellbeing Environmental – protect environment/ build in resilience
4. To reduce land contamination and protect soil quality and quantity	Will it maintain the area of grade 1, 2 and 3a agricultural land? Will it remediate contaminated land and/or improve soil quality? Will it achieve efficiency in land use and avoid development of greenfield land over the redevelopment of previously developed land and buildings? Will it reduce the amount of derelict and/or underused land and/or vacant/unfit properties? Will it promote higher density development in appropriate locations?	Amount of contaminated land remediated. Area of grade 1, 2 and 3 agricultural land permanently lost to development (ha). Percentage of development built on previously developed land. Average density on sites with 10 or more dwellings (Dwellings per Ha.).	Economic – protect high quality agricultural land to protect the rural economy Environmental – protect and enhance of the natural environment

Objective	Decision Aiding Questions	Indicators	NPPF Theme
5. To reduce air and noise pollution	<p>Will it improve air quality, in particular concentrations of NO₂ and PM_{2.5}?</p> <p>Will it reduce the number of properties or sites affected by poor air quality?</p> <p>Will it reduce the number of residential properties affected by and exposed to noise?</p>	<p>Annual average of NO₂ and PM_{2.5}, within AQMAs relative to national standards.</p> <p>The number of properties and land affected where levels of NO_x or PM_{2.5} exceed national targets.</p> <p>The monitoring of LEQ noise levels around airports.</p> <p>Number of non-airport related noise complaints received per annum.</p>	<p>Social – improvements in air, noise and light pollution will support healthy communities</p> <p>Environmental – protect natural environment, improve biodiversity and mitigate climate change</p>
6. To conserve and enhance biodiversity, habitats and species	<p>Will it maintain or enhance designated sites?</p> <p>Will it maintain/enhance numbers of priority species or the extent and condition of priority habitats identified in Biodiversity Opportunity Areas and the Borough as a whole?</p> <p>Will it avoid the fragmentation of designated and priority habitats?</p> <p>Will it contribute towards achieving net gains in biodiversity?</p> <p>Will it help to deliver any identified Nature Improvement Areas?</p> <p>Will it protect the Borough's green/blue infrastructure and enhance connectivity?</p>	<p>Population of wild birds.</p> <p>Extent and condition of SPA/Ramsar sites.</p> <p>Extent and condition of Sites of Special Scientific Interest (SSSI) meeting PSA targets.</p> <p>Extent and condition of priority species and habitats identified in Biodiversity Opportunity Areas in Spelthorne.</p> <p>Number, area and condition of Sites of Nature Conservation Importance (SNCIs) and Local Nature Reserves (LNRs) within Spelthorne.</p> <p>Extent and condition of ancient woodlands Number of Biodiversity improvement/enhancement schemes implemented per annum.</p>	<p>Social – enhancement of biodiversity will support the community's health and social well-being</p> <p>Environmental – help to conserve and improve biodiversity</p>

Objective	Decision Aiding Questions	Indicators	NPPF Theme
7. To conserve and enhance the historic environment, heritage assets and their settings.	<p>Will it conserve or enhance heritage assets, the historic environment and their settings?</p> <p>Will it improve the quality of the historic environment?</p> <p>Will it provide increased access to and enjoyment of the historic environment?</p> <p>Will it ensure that development is well-designed and is well-related to the surrounding townscape?</p>	<p>Number of listed buildings, ancient monuments and conservation areas. Statutory or locally listed buildings or structures at risk.</p> <p>Statutory or locally listed buildings or structures demolished.</p> <p>Scheduled ancient monuments at risk.</p> <p>Number of archaeological finds.</p> <p>Conservation area appraisals and level at risk.</p>	<p>Economic – protection of historic and cultural assets will support tourism economy and create attractive areas for businesses to locate to</p> <p>Social – maintain a high-quality built environment</p>
8. To protect, enhance and manage Borough's open space and landscape character.	<p>Will it protect and enhance landscape character?</p> <p>Will it ensure the quality of and provision of suitable open space, where need is identified?</p>	<p>Quality and quantity of open space provision</p> <p>Areas with landscape assessment</p>	<p>Social – the enhancement of the natural environment will support the community's health and social wellbeing</p> <p>Environmental – the protection and enhancement of the natural environment</p> <p>Economic – character of the natural environment is a consideration within "smart growth" as they are attractive areas to locate to</p>
9. To promote sustainable modes of travel, improve accessibility to public transport and reduce road congestion	<p>Will it reduce the need to travel, especially by private motorised vehicles?</p> <p>Will it avoid contributing to congestion on the highway network?</p>	<p>Traffic counts</p> <p>Travel to work by mode</p> <p>Number of schools/businesses with travel plans implemented</p>	<p>Economic – an inadequate transport system will have significant detrimental effects on the economy therefore this will be needed to assist in building a</p>

Objective	Decision Aiding Questions	Indicators	NPPF Theme
	<p>Will it promote more sustainable modes of travel?</p> <p>Will it provide improved access to public transport services and facilities?</p> <p>Will it provide opportunities for integrated Transport? Will it promote travel to work/school by foot, cycle or public transport?</p> <p>Will it provide for disabled access to all transport options?</p>	<p>Number of highway/cyclist/pedestrian improvement schemes implemented</p>	<p>strong, responsive and competitive economy</p> <p>Environmental – sustainable transport will mitigate climate change and assist with the move to a low carbon economy</p> <p>Social – more sustainable travel options will positively impact health, wellbeing and improve quality of life.</p>
10. Maintain high levels of employment and economic growth which is inclusive and sustainable across the Borough.	<p>Will it support a stable labour market and contribute towards skills improvement and employment opportunities?</p> <p>Will it support or promote inward investment and business growth?</p> <p>Will it retain the most sustainably located employment sites?</p> <p>Will it maintain or increase the total quantity and/or quality of commercial floorspace?</p> <p>Will it promote mixed use development?</p> <p>Will it promote or enhance the viability, vitality and attractiveness of town or local centres?</p>	<p>IMD employment and education rankings.</p> <p>Working age population which are economically active.</p> <p>Educational attainment levels NVQ level 3 and above. The net change in the number of VAT registrations and de-registrations.</p> <p>Commercial floorspace levels and vacancies.</p> <p>Area of employment sites lost to other uses (ha). Amount of retail/commercial leisure floorspace implemented (sqm).</p> <p>Amount of retail/commercial leisure floorspace lost to other uses within town/local centres (sqm).</p> <p>Footfall numbers</p>	<p>Economic – contribute to building a strong, responsive and competitive economy</p> <p>Social – a strong economy that keeps unemployment levels low will help support strong, vibrant and healthy communities</p> <p>Environmental – support of innovative technologies will assist in the move to a low carbon economy and promoting the local economy will reduce the need to travel</p>

Objective	Decision Aiding Questions	Indicators	NPPF Theme
11. To limit the impact of Climate Change and promote the efficient use of resources, to reduce greenhouse gas emissions and move to a low carbon economy.	<p>Will it promote energy efficiency and/or renewable or low carbon technologies?</p> <p>Will it promote sustainable methods of construction and design?</p> <p>Will it promote the reuse and recycling of demolition waste?</p> <p>Will it reduce emissions?</p> <p>Reduce impact of climate change, including flooding and urban heat island effect?</p> <p>Will it ensure new and retrofitted development and infrastructure location and design is future proofed against the future impact of climate change?</p>	<p>CO2 Emissions (total and per capita).</p> <p>Number of commercial premises built to BREEAM 'Very good' or better.</p> <p>Installed renewable/low carbon energy capacity (MW/h).</p> <p>Amount of demolition waste reused or recycled per annum (tonnes).</p>	<p>Economic – contribute to building an innovative economy</p> <p>Social – support long term positive impacts on overall quality of life for current and future generations</p> <p>Environmental – mitigate climate change</p>
12. To maintain and improve water quality and promote the efficient use of water	<p>Will it protect and improve the quality of all water sources?</p> <p>Will it increase water efficiency?</p> <p>Will it promote greywater recycling/rainwater harvesting?</p> <p>Will it protect and improve hydro-geomorphology and the overall ecological status of the watercourses?</p>	<p>Percentage of river and groundwater units in the plan area whose biological and/or chemical quality is rated as good.</p> <p>Household consumption of water per day.</p> <p>Number of dwellings completed which exceed Building Regulations standards for water efficiency.</p> <p>Commercial consumption of water per day.</p> <p>Number of commercial developments completed with water efficiency measures implemented.</p>	<p>Social – improvements in water resources and supply e.g. drinking water provision</p> <p>Environmental – improve biodiversity, use natural resources prudently and minimise pollution</p> <p>Economic – reduced water consumption will have knock on impacts on financial and less outlay, providing opportunities for spending on the local economy.</p>