

Spelthorne Local Plan Representations Made in Relation to the Main Modifications (In Main Modification Order)



Spelthorne Takes Shape

June 2025

Spelthorne Local Plan : Representations Made in Relation to the Main Modifications (In Main Modification Order)

The consultation of the Spelthorne Local Plan Main Modifications was held between 3 April and 15 May 2025. 177 responses were received from 33 individuals or organisations.

Following the Local Plan Examination Hearing sessions, Inspector Bridgwater proposed a number of changes to the Local Plan known as 'Main Modifications', which he considers are necessary to make the Plan 'sound' and/or legally compliant. The [Main Modifications](#) have been subject to a Sustainability Appraisal by the Council and an [Addendum report to the Sustainability Appraisal](#) has been produced.

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM table intro	
Respondent: Mr Terence Fearn (33667297)	
Organisation:	
Response ID: 13017653 (CO/12)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>There is insufficient consideration of the impact of developments in the centre of Staines on flood risk. In particular, the impact on groundwater flood risk. Recent, peer-reviewed research by Dr Jonathan Paul, Senior Lecturer in Earth Science, Department of Earth Sciences, Royal Holloway University demonstrates the risk of groundwater flooding in the centre of Staines. Further information is available in his paper in the Journal of Flood Risk Management (attached) or from Dr. Paul (jonathan.paul@rhul.ac.uk).</p> <p>Until very recently, little was known about flood risk from groundwater in Staines (and elsewhere in the borough). It appears there is no statutory consultee in the planning system with responsibility to monitor and advise on this source. This risk will be increased by the developments which are planned in Staines and the surrounding area. Consequently, it must be properly assessed before the remaining developments are approved.</p>	
Question 4: Please use this text box to provide any other comments.	
No Response	
Attachments	
Attachment Name: Copy of flooding_2025_ppt.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1189803/PDF/-/Copy%20of%20flooding_2025_ppt.pdf
Attachment Name: FLOOD RISK MANAGEMENT PAUL_RHUL - 2025 - Paul - Groundwater Flooding of Superficial Gravels in an Urbanized Catchment.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1189804/PDF/-/FLOOD%20RISK%20MANAGEMENT%20PAUL_RHUL%20-%202025%20-%20Paul%20-%20Groundwater%20Flooding%20of%20Superficial%20Gravels%20in%20a.pdf
Link to comment:	
https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13017653&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15946356%26repIDstyle%3Dstarts%26repSta	

Representations Received in Response to Main Modifications Consultation (in MM number order)

[tus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3D%26%26sort%3DsubmitDate%26dir%3Ddesc%26startRow%3D1](#)

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM table intro
Respondent: Mr Ian Swinglehurst (25691265)
Organisation:
Response ID: 13017685 (CO/13)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>The plan elevates the ground water levels which in turn bathes an ancient foul water system. The ground water drains back through the many fractures in the 150 years old pipes and overwhelms the Sewage Treatment Works. This is why Thames Water routinely discharge untreated sewage into the Thames, even when there has been no rainfall within 48 hours.</p> <p>This local plan merely creates more risk and does nothing to reduce risk.</p>
Question 4: Please use this text box to provide any other comments.
<p>The plan dramatically increases the risks associated with the ground water systems which are at least 10 times greater in volume than the water seen in the main river channel. The installatioin of deep foundations WILL accelerate the rate and severity of flood events independent of 'Climate Change', which will merelt amplify the effects further.</p> <p>I think is blindingly obvious, that this Staines Town Centre developments with have a huge impact in a vast number of ways, however they also pose a huge threat to more than 5,000 households in The Hythe and Pooley Green, which are extremely sensative to the hydrological impact of filling Staines full of concrete.</p> <p>Thus far Spelthorne's Officers have refused to take this threat seriously, hence we are examining is that has any criminal implications and how they may be applied.</p>
Attachments
<p>Link to comment:</p> <p>https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13017685&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15946356%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3D%26%26sort%3DsubmitDate%26dir%3Ddesc%26startRow%3D1</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM table intro	
Respondent: Mrs Judith Orr [Runnymede Borough Council] (58986305)	
Organisation: Runnymede Borough Council	
Response ID: 13016565 (CO/10)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No Response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No Response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
Having carefully looked through the Proposed Main Modifications to the Spelthorne Borough Council Local Plan, I am writing to let you that we have no comments to make on the proposed modifications to the Plan.	
Question 4: Please use this text box to provide any other comments.	
No Response	
Attachments	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13016565&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15946356%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3D%26%26sort%3DsubmitDate%26dir%3Ddesc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM table intro	
Respondent: Janet Ashton (19546433)	
Organisation: Charles Morris Management Ltd	
Response ID: 13024021 (CO/166)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No Response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No Response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No Response	
Question 4: Please use this text box to provide any other comments.	
RESPONSE ON BEHALF OF CHARLES MORRIS MANAGEMENT LIMITED TO THE ATLAS OF PROPOSED CHANGES – PM001 OAKLEAF FARM RECYCLING FACILITY	
Attachments	
Attachment Name: Response on Behalf of Charles Morris Management Ltd. to the Atlas of proposed Changes PM001.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1207847/PDF/-/Response
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13024021&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D%26repIDstyle%3Dstarts%26repStatus%3DP%252CM%252CR%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DmodifyDate%26dir%3Ddesc%26startRow%3D11	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM01	
Respondent: Mr Darren Oakley [RPS Consulting] (59328481)	
Organisation: Bewley Homes	
Response ID: 13020245 (CO/79)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No Response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No Response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>Please find attached the responses to the main modifications consultation. Any queries with the details submitted, please let us know by return.</p> <p>MM01 – Plan Period</p> <p>MM01 proposes a modification to the plan period to cover the timeframe 2024-2039. The justification is to make the Plan consistent with national policy and positively prepared and to reflect latest housing trajectory and supply period.</p> <p>Paragraph 22 of the NPPF 2021 states that strategic policies should look ahead over a minimum 15 year period from adoption. In order that the Plan is consistent with national policy, the plan period should run until at least 2040, which is 15 years from the adoption date which we assume will be during 2025.</p> <p>Furthermore, the proposed end date of 2039 does not align with the latest housing trajectory, which covers the period up to 2040 (Appendix D2).</p> <p>MM01 is not consistent with national policy and does not reflect the housing trajectory and so is not positively prepared. It is also not explained why this would be justified. Taken together, MM01 is not soundly-based.</p> <p>To make the Plan sound, it should be explicitly stated in the Plan that the plan period is 2024 to 2040.</p>	
Question 4: Please use this text box to provide any other comments.	
No Response	
Attachments	
Attachment Name: Cover letter - PMM response obo Bewley Homes May 2025.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198490/PDF/-/Cover%20letter%20-%20PMM%20response%20obo%20Bewley%20Homes%20May%202025.pdf
Attachment Name: PMMs - Spelthorne Local plan obo Bewley Homes.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198491/PDF/-/PMMs%20-%20Spelthorne%20Local%20plan%20obo%20Bewley%20Homes.pdf
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020245&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partID%3D15918516%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3D%26%26sort%3DsubmitDate%26dir%3Ddesc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM01	
Respondent: Mrs Kath Sanders (19813377)	
Organisation:	
Response ID: 13021077 (CO/105)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No Response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No Response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No Response	
Question 4: Please use this text box to provide any other comments.	
<p>1. THROUGHOUT</p> <p>MM01 - Amend Plan period to 2024 - 2039</p> <p>Other: Inconsistency in text. Plan period in latest housing trajectory has been extended to 16 years which would suggest plan period would be 2024 - 2040.</p> <p>Rationale: This will lead to confusion down the road if left as is, as Years 1-5 are currently being stated in revised Local Plan as 2024-2028, when actually in the housing trajectory it relates to figures for 2024/25-2028/29.</p> <p>Recommendation: It would be better to adopt the approach of the original plan and state the total plan period as 2024 - 2040, with Years 1-5 as being 2025-2029, Years 6-10 as being 2030-2034, and Years 11-16 as being 2035-2040.</p> <p>Dear Sir,</p> <p>Many of the Main Modifications are welcome and justify the work that the Council, the Environment Agency and yourself have put in over two years in trying to make the Plan sound. The changes go a long way to explain “the horns of the dilemma” upon which you found yourself.</p> <p>The following Main Modifications are particularly welcome:</p> <ul style="list-style-type: none"> • the removal of 5 strategic site allocations due to flood risk • the imposition of a requirement to delay 11 further strategic site allocations until a safe route for access and egress can be provided - 8 in Staines and 3 in Shepperton • the imposition of a constraint to some strategic site allocations restricting development to the built footprint • a completely revised policy E3 on managing flood risk and significantly updated evidence base for flooding <p>However, a couple of sticking points remain, principally on groundwater flood risk, and I hope that the detailed comments below might prove useful.</p>	
Attachments	
Attachment Name:	
Attachment Name:	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021077&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15918516%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3D%26%26sort%3DsubmitDate%26dir%3Ddesc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM10	
Respondent: Craig Hatton [Network Rail] (59464353)	
Organisation: Network Rail	
Response ID: 13018869 (CO/36)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No Response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No Response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>Policy ST2 Planning for the Borough (MM10 and MM11)</p> <p>NR supports the proposed main modifications (MM10 and MM11) to update the annual housing requirement to reflect the most up-to-date need. This reflects the importance of planning positively to ensure that needs are clearly updated and set out to allow infrastructure providers, such as NR, to plan for infrastructure improvements over the Plan period.</p>	
Question 4: Please use this text box to provide any other comments.	
Please see attached NR representations to the consultation, ending 15 May 2025.	
Attachments	
Attachment Name: Network Rail response to Spelthorne Local Plan Main Modifications April 2025 (1).pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197619/PDF/-/Network%20Rail%20response%20to%20Spelthorne%20Local%20Plan%20Main%20Modifications%20April%202025%20_1_.pdf
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13018869&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15919508%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM10	
Respondent: Flora Macleod [Savills] (41643681)	
Organisation: Wates Developments	
Response ID: 13020469 (CO/86)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No Response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No Response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
SBC is already very marginal on its projected housing delivery, and we consider that greater certainty could be achieved through an increased number of housing allocations or a change to Green Belt boundary in this location, which would directly facilitate the Reserved Matters of the permission. See sections (A) – (C) below.	
Question 4: Please use this text box to provide any other comments.	
In response to the main modifications to the Local Plan, please see attached our representations of Wates Developments.	
Attachments	
Attachment Name: SBC - Wates Main Mods Reps-submission.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198543/PDF/-/SBC%20-%20Wates%20Main%20Mods%20Reps-%20submission.pdf
Attachment Name: Appendix 1- draft site allocation policy.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198544/PDF/-/Appendix%201-%20draft%20site%20allocation%20policy.pdf
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020469&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15919508%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3D%26%26sort%3DsubmitDate%26dir%3Ddesc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM10	
Respondent: Lauren Cadore [Iceni] (59392577)	
Organisation: Diocese of London	
Response ID: 13024181 (CO/171)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No Response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No Response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>c. MM10 and MM11 Policy ST2: Planning for the borough</p> <p>In addition to the Proposed Main Modifications relating to site allocations, there are several other proposed Main Modifications that these representations seek to comment on, explored in the following sections of these representations.</p> <p>Proposed Main Modifications MM10 and MM11 are alterations to Policy ST2: Planning for the borough. This policy sets out the housing requirement for the borough. As part of MM10 the housing requirement for the borough has increased from 618 units per annum to 631 units per annum, the previous standard method figure. This change is considered to make the Local Plan sound in relation to the effectiveness, national policy and positively prepared tests of soundness.</p>	
Question 4: Please use this text box to provide any other comments.	
No Response	
Attachments	
Attachment Name: 250508 Main Modifications Representations May 2025 Final.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1207864/PDF/-/250508%20Main%20Modifications%20Representations%20May%202025%20Final.pdf
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13024181&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D%26repIDstyle%3Dstarts%26repStatus%3DP%252CM%252CR%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DmodifyDate%26dir%3Ddesc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM11	
Respondent: Lauren Cadore [Iceni] (59392577)	
Organisation: Diocese of London	
Response ID: 13024213 (CO/172)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No Response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No Response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>c. MM10 and MM11 Policy ST2: Planning for the borough</p> <p>In addition to the Proposed Main Modifications relating to site allocations, there are several other proposed Main Modifications that these representations seek to comment on, explored in the following sections of these representations.</p> <p>Proposed Main Modifications MM10 and MM11 are alterations to Policy ST2: Planning for the borough. This policy sets out the housing requirement for the borough. As part of MM10 the housing requirement for the borough has increased from 618 units per annum to 631 units per annum, the previous standard method figure. This change is considered to make the Local Plan sound in relation to the effectiveness, national policy and positively prepared tests of soundness.</p>	
Question 4: Please use this text box to provide any other comments.	
No Response	
Attachments	
Attachment Name: 250508 Main Modifications Representations May 2025 Final.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1207868/PDF/-/250508%20Main%20Modifications%20Representations%20May%202025%20Final.pdf
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13024213&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D%26repIDstyle%3Dstarts%26repStatus%3DP%252CM%252CR%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DmodifyDate%26dir%3Ddesc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM11	
Respondent: Craig Hatton [Network Rail] (59464353)	
Organisation: Network Rail	
Response ID: 13018901 (CO/37)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No Response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No Response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>Policy ST2 Planning for the Borough (MM10 and MM11)</p> <p>NR supports the proposed main modifications (MM10 and MM11) to update the annual housing requirement to reflect the most up-to-date need. This reflects the importance of planning positively to ensure that needs are clearly updated and set out to allow infrastructure providers, such as NR, to plan for infrastructure improvements over the Plan period.</p>	
Question 4: Please use this text box to provide any other comments.	
Please see attached NR representations to the consultation, ending 15 May 2025.	
Attachments	
Attachment Name: Network Rail response to Spelthorne Local Plan Main Modifications April 2025 (1).pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197622/PDF/-/Network%20Rail%20response%20to%20Spelthorne%20Local%20Plan%20Main%20Modifications%20April%202025%20_1_.pdf
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13018901&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15919508%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM11	
Respondent: Mr darren oakley [RPS Consulting] (59328481)	
Organisation: Bewley Homes	
Response ID: 13020277 (CO/80)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No Response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No Response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>MM11 – Policy ST2 (housing requirement)</p> <p>Response:</p> <p>MM11 proposes changes to the per annum housing requirement and housing land provision to reflect the latest housing trajectory and objectively assessed need since submission.</p> <p>Through this modification, the housing requirement is 10,096 dwellings, versus a total supply of 9,911. Paragraph 11a of the NPPF 2021 makes clear that Plans should meet the development needs of their area. In addition, strategic policies should provide, as a minimum, for the objectively assessed need for housing, unless the first or second limb of paragraph 11b is triggered.</p> <p>On the basis of MM11, far from there being any allowance for non-implementation or flexibility in sources of supply, there will be a plan period shortfall of 185 dwellings on adoption. MM11 is not consistent with national policy and so is not soundly-based. We contend that new Policy E3 (Appendix C) provides an opportunity to address this shortfall, as well as build in an element of flexibility and contingency into the overall provision for housing, through the allocation of additional housing sites in the Plan.</p>	
Question 4: Please use this text box to provide any other comments.	
Please find attached the responses to the main modifications consultation. Any queries with the details submitted, please let us know by return.	
Attachments	
Attachment Name: Cover letter - PMM response obo Bewley Homes May 2025.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198572/PDF/-/Cover%20letter%20-%20PMM%20response%20obo%20Bewley%20Homes%20May%202025.pdf
Attachment Name: PMMs - Spelthorne Local plan obo Bewley Homes.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198573/PDF/-/PMMs%20-%20Spelthorne%20Local%20plan%20obo%20Bewley%20Homes.pdf
Attachment Name:	
Attachment Name:	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Link to comment:

<https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020277&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15919508%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM11	
Respondent: Flora Macleod [Savills] (41643681)	
Organisation: Wates Developments	
Response ID: 13020501 (CO/87)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No Response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No Response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
SBC is already very marginal on its projected housing delivery, and we consider that greater certainty could be achieved through an increased number of housing allocations or a change to Green Belt boundary in this location, which would directly facilitate the Reserved Matters of the permission. See sections (A) – (C) below.	
Question 4: Please use this text box to provide any other comments.	
In response to the main modifications to the Local Plan, please see attached our representations of Wates Developments.	
Attachments	
Attachment Name: SBC - Wates Main Mods Reps-submission.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198545/PDF/-/SBC%20-%20Wates%20Main%20Mods%20Reps-%20submission.pdf
Attachment Name: Appendix 1- draft site allocation policy.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198546/PDF/-/Appendix%201-%20draft%20site%20allocation%20policy.pdf
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020501&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15919508%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM11	
Respondent: Mrs Kath Sanders (19813377)	
Organisation:	
Response ID: 13021109 (CO/106)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No Response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No Response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No Response	
Question 4: Please use this text box to provide any other comments.	
<p>3. STRATEGY AND STRATEGIC POLICIES</p> <p>MM11 - Amend total and new home housing numbers in Policy ST2</p> <p>Other: Similar to comment on MM01. Inconsistency in text where it states plan period of 2024-2039. Plan period is stated elsewhere to be 16 years to 2040 (and is shown as such in the housing trajectory).</p> <p>Rationale: It's not clear when it states 9,911 new homes that that relates to 16 years so could lead to confusion.</p> <p>Recommendation: Either change plan period to 2024 - 2040 or add "of 16 years" after "During the plan period".</p> <p>Dear Sir,</p> <p>Many of the Main Modifications are welcome and justify the work that the Council, the Environment Agency and yourself have put in over two years in trying to make the Plan sound. The changes go a long way to explain "the horns of the dilemma" upon which you found yourself.</p> <p>The following Main Modifications are particularly welcome:</p> <ul style="list-style-type: none"> • the removal of 5 strategic site allocations due to flood risk • the imposition of a requirement to delay 11 further strategic site allocations until a safe route for access and egress can be provided - 8 in Staines and 3 in Shepperton • the imposition of a constraint to some strategic site allocations restricting development to the built footprint • a completely revised policy E3 on managing flood risk and significantly updated evidence base for flooding <p>However, a couple of sticking points remain, principally on groundwater flood risk, and I hope that the detailed comments below might prove useful.</p>	
Attachments	
Attachment Name:	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Link to comment:

<https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021109&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15919508%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM12	
Respondent: Flora Macleod [Savills] (41643681)	
Organisation: Wates Developments	
Response ID: 13020533 (CO/88)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No Response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No Response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
SBC is already very marginal on its projected housing delivery, and we consider that greater certainty could be achieved through an increased number of housing allocations or a change to Green Belt boundary in this location, which would directly facilitate the Reserved Matters of the permission. See sections (A) – (C) below.	
Question 4: Please use this text box to provide any other comments.	
In response to the main modifications to the Local Plan, please see attached our representations of Wates Developments.	
Attachments	
Attachment Name: SBC - Wates Main Mods Reps-submission.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198547/PDF/-/SBC%20-%20Wates%20Main%20Mods%20Reps-%20submission.pdf
Attachment Name: Appendix 1- draft site allocation policy.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198548/PDF/-/Appendix%201-%20draft%20site%20allocation%20policy.pdf
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020533&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15919508%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3Dobjector%5F%5FcommonName%26dir%3Dasc%26startRow%3D11	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM12	
Respondent: Mrs Kath Sanders (19813377)	
Organisation:	
Response ID: 13021525 (CO/119)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
Yes	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>9. INFRASTRUCTURE AND DELIVERY</p> <p>Rationale: I do not believe that the Policies on Infrastructure and Delivery (ID1 and ID2), together with their Main Modifications, are yet sound. I don't believe they are positively prepared, justified by the supporting evidence, or that they will be effective over the plan period. The latest Infrastructure Delivery Plan is not up-to-date, it still has many gaps and provides no overview or gap analysis. It therefore makes it difficult for any applicant to know what is expected of them.</p> <p>Recommendation: A full overhaul is required as part of the "immediate review" and a schedule provided with an overall summary of costs and funding, along with a gap analysis.</p>	
Question 4: Please use this text box to provide any other comments.	
<p>Dear Sir,</p> <p>Many of the Main Modifications are welcome and justify the work that the Council, the Environment Agency and yourself have put in over two years in trying to make the Plan sound. The changes go a long way to explain "the horns of the dilemma" upon which you found yourself.</p> <p>The following Main Modifications are particularly welcome:</p> <ul style="list-style-type: none"> • the removal of 5 strategic site allocations due to flood risk • the imposition of a requirement to delay 11 further strategic site allocations until a safe route for access and egress can be provided - 8 in Staines and 3 in Shepperton • the imposition of a constraint to some strategic site allocations restricting development to the built footprint • a completely revised policy E3 on managing flood risk and significantly updated evidence base for flooding <p>However, a couple of sticking points remain, principally on groundwater flood risk, and I hope that the detailed comments below might prove useful.</p>	
Attachments	
Attachment Name:	
Attachment Name:	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Attachment Name:	
Attachment Name:	
Link to comment:	https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021525&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15919508%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3Dobjector%5F%5FcommonName%26dir%3Dasc%26startRow%3D1

Main Modifications number: MM13																
Respondent: Mr darren oakley [RPS Consulting] (59328481)																
Organisation: Bewley Homes																
Response ID: 13020309 (CO/81)																
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?																
No Response																
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?																
No Response																
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.																
MM13 – Policy ST2 (housing land provision sources) Response: MM13 presents an updated table covering the sources of supply over the plan period. The modification shown above the table refers to the 2024-2039 period. Consistent with our other responses, this modification should be amended to read ‘2024-2040’ to ensure the Plan is soundly-based. The modified table confirms the projected supply over the plan period is expected to be 9,911 dwellings, and so confirms there is a plan period shortfall. We also see that the amount of housing expected from committed sources (sites ‘under construction’ for example) is significantly greater than previous estimates, whilst the expected supply from future allocations and brownfield sites is reduced. The change is summarised in the table below, for the reader’s benefit. Change in mix of supply sources based on the April 2025 MMs (Table 1) <table><tr><td>Source</td><td>April 2025 MM</td><td>Previous MM (10a, 25)</td><td>Change</td></tr><tr><td>Supply from future permissions on allocated sites</td><td>5,964</td><td>6,073</td><td>-109</td></tr><tr><td>Future supply (Brownfield Tier 2 sites, >5 units)</td><td>1,007</td><td>1,729</td><td>-722</td></tr><tr><td>Windfalls (total)</td><td>1,174</td><td>845</td><td>+329</td></tr></table>	Source	April 2025 MM	Previous MM (10a, 25)	Change	Supply from future permissions on allocated sites	5,964	6,073	-109	Future supply (Brownfield Tier 2 sites, >5 units)	1,007	1,729	-722	Windfalls (total)	1,174	845	+329
Source	April 2025 MM	Previous MM (10a, 25)	Change													
Supply from future permissions on allocated sites	5,964	6,073	-109													
Future supply (Brownfield Tier 2 sites, >5 units)	1,007	1,729	-722													
Windfalls (total)	1,174	845	+329													

Representations Received in Response to Main Modifications Consultation (in MM number order)

Committed sources (extant PPs, u/c) 2,036 792 +1,244	
The wider implication from the change in mix of supply sources, under MM13, will result in a reduction in forward supply on sites yet to be granted consent, and an increase in 'committed' sources. This reduces the ability of the Council to influence the design and quality of future housing because a significant proportion of the supply already has consent, which undermines the delivery of the other housing-related benefits to be secured through the site allocations policies of the new Plan. This does not represent a positively prepared approach. It is not soundly-based.	
Question 4: Please use this text box to provide any other comments.	
Please find attached the responses to the main modifications consultation. Any queries with the details submitted, please let us know by return.	
Attachments	
Attachment Name: Cover letter - PMM response obo Bewley Homes May 2025.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198498/PDF/-/Cover%20letter%20-%20PMM%20response%20obo%20Bewley%20Homes%20May%202025.pdf
Attachment Name: PMMs - Spelthorne Local plan obo Bewley Homes.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198499/PDF/-/PMMs%20-%20Spelthorne%20Local%20plan%20obo%20Bewley%20Homes.pdf
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020309&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15919508%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM13	
Respondent: Flora Macleod [Savills] (41643681)	
Organisation: Wates Developments	
Response ID: 13020565 (CO/89)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No Response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No Response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
It is considered that sites with the benefit of planning permission should be afforded greater weight in the Local Plan, and should have the benefit of an allocation or a change to the Green Belt boundary. This is particularly pertinent for outline permissions in the Green Belt. See sections (A) – (C) below.	
Question 4: Please use this text box to provide any other comments.	
In response to the main modifications to the Local Plan, please see attached our representations of Wates Developments.	
Attachments	
Attachment Name: SBC - Wates Main Mods Reps-submission.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198550/PDF/-/SBC%20-%20Wates%20Main%20Mods%20Reps-%20submission.pdf
Attachment Name: Appendix 1- draft site allocation policy.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198551/PDF/-/Appendix%201-%20draft%20site%20allocation%20policy.pdf
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020565&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15919508%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM13
Respondent: Mrs Kath Sanders (19813377)
Organisation:
Response ID: 13021141 (CO/107)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No Response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No Response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
No Response
Question 4: Please use this text box to provide any other comments.
<p>MM13 - Updated Sources of Supply</p> <p>Other: Typo (transposition) - allocations figure should read 5,694 not 5,964.</p> <p>Recommendation: Correct the allocations figure to read 5,694.</p> <p>Dear Sir,</p> <p>Many of the Main Modifications are welcome and justify the work that the Council, the Environment Agency and yourself have put in over two years in trying to make the Plan sound. The changes go a long way to explain "the horns of the dilemma" upon which you found yourself.</p> <p>The following Main Modifications are particularly welcome:</p> <ul style="list-style-type: none"> • the removal of 5 strategic site allocations due to flood risk • the imposition of a requirement to delay 11 further strategic site allocations until a safe route for access and egress can be provided - 8 in Staines and 3 in Shepperton • the imposition of a constraint to some strategic site allocations restricting development to the built footprint • a completely revised policy E3 on managing flood risk and significantly updated evidence base for flooding <p>However, a couple of sticking points remain, principally on groundwater flood risk, and I hope that the detailed comments below might prove useful.</p>
Attachments
<p>Link to comment:</p> <p>https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021141&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15919508%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D11</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM14
Respondent: Mr darren oakley [RPS Consulting] (59328481)
Organisation: Bewley Homes
Response ID: 13020341 (CO/82)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No Response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No Response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>MM14 and MM15 (draft housing trajectory)</p> <p>Response:</p> <p>These modifications relate to the proposed housing trajectory, shown in Appendix D1 and D2 to the schedule of modifications. The modifications relate to the plan period trajectory.</p> <p>National policy makes clear that planning policies should identify a supply of:</p> <ul style="list-style-type: none"> a) specific, deliverable sites for years one to five of the plan period, and b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan (NPPF 2021, para 68) <p>In maintaining the supply of land, plans should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies; and provision should be made for a suitable buffer of 5%,10%, or 20% where there has been significant under-delivery of housing, moved forward from later in the plan period (NPPF 2021, para 74).</p> <p>Whilst there is some commentary provided on the expected rate of completions on a plan period basis, very little explanation is provided which demonstrates there is likely to exist a five-year supply of deliverable sites from the start of the plan (2024). It is unclear from the modifications, or the pre-submission version of the Plan, whether a sufficient number of sites has been identified to provide a minimum of five years' worth of housing land, contrary to national policy.</p> <p>Similarly, the housing trajectory summary graph (Appendix D2) identifies the standard method annual requirement, plus a 20% buffer (shown as a black line) for the years 2024-2029, the first five years of the modified plan period. The Council has, rightly, highlighted the 20% buffer in the requirement because there has been significant under-delivery of housing over the previous three years in Spelthorne, as evidenced in the latest Housing Delivery Test score (65%) 1 . The base standard method for the first five years is 3,155 dwellings (631 x 5). When adding the 20% buffer, that gives an annual requirement of 757 dpa; over the five years, the requirement is 3,786 dwellings.</p> <p>Against these requirements, the housing trajectory summary table (Appendix D1) identifies projected completions totalling 3,794 during the first five years of the plan. The supply is projected to exceed the 'base' requirement. However, when compared to the correct requirement for the first five years in line with national policy ('SM + 20% buffer'), the exceedance falls to just 8 dwellings. This represents a minimal measure of contingency in the supply against requirements in the early years of the Plan.</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

It is important to note that actual housing delivery in recent years in Spelthorne has also been notably deficient. This is evident in the outcome against the Government's Housing Delivery Test (for the period 2020-2023). Over the last three years (2020-2023), 992 net new dwellings have been built in the district, and average of 331 per year.

Given the tightness in the supply projections, the modified housing trajectory (Appendix D1 and D2) makes virtually no allowance for flexibility or potential non-implementation against the targets, which has been a characteristic of delivery performance in Spelthorne in recent years. In terms of effectiveness, the Plan also does not clearly set out what sources will comprise the deliverable supply in the first five years of delivery. We must conclude there can be little confidence that the Council will meet even the baseline requirement figure, 631 dpa, given recent performance, let alone the higher requirement the Council should be planning for in the early years. The housing trajectory and the approach to five-year supply is not soundly-based.

On this basis, we contend the modifications to the projected supply of housing, proposed through MM14, MM15 (and MM13) do not go far enough in providing the necessary leeway should delivery of allocated sites not come forward at the rate anticipated in the trajectory, resulting in a shortfall against planned targets. We respectfully request the Inspectors to consider allocating additional land in the Plan to reduce the risk of plan failure in the early years on deliverability grounds, and thus make the Plan soundly-based.

1 Housing Delivery Test: 2023 measurement

Question 4: Please use this text box to provide any other comments.

Please find attached the responses to the main modifications consultation. Any queries with the details submitted, please let us know by return.

Attachments

Attachment Name: Cover letter - PMM response obo Bewley Homes May 2025.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198508/PDF/-/Cover%20letter%20-%20PMM%20response%20obo%20Bewley%20Homes%20May%202025.pdf
Attachment Name: PMMs - Spelthorne Local plan obo Bewley Homes.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198509/PDF/-/PMMs%20-%20Spelthorne%20Local%20plan%20obo%20Bewley%20Homes.pdf
Attachment Name:	
Attachment Name:	

Link to comment:

<https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020341&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15919508%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D11>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM14	
Respondent: Flora Macleod [Savills] (41643681)	
Organisation: Wates Developments	
Response ID: 13020597 (CO/90)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No Response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No Response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
The site is included in the housing trajectory and therefore should become a site allocation or excluded from the Green Belt.	
Question 4: Please use this text box to provide any other comments.	
In response to the main modifications to the Local Plan, please see attached our representations of Wates Developments.	
Attachments	
Attachment Name: SBC - Wates Main Mods Reps-submission.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198552/PDF/-/SBC%20-%20Wates%20Main%20Mods%20Reps-%20submission.pdf
Attachment Name: Appendix 1- draft site allocation policy.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198553/PDF/-/Appendix%201-%20draft%20site%20allocation%20policy.pdf
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020597&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15919508%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D11	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM14
Respondent: Mrs Kath Sanders (19813377)
Organisation:
Response ID: 13021173 (CO/108)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No Response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No Response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
No Response
Question 4: Please use this text box to provide any other comments.
<p>3. STRATEGY AND STRATEGIC POLICIES</p> <p>MM14</p> <p>Other: Inconsistency in “justification” text. Appendix D1 shows 16 years (to 2039/40) not 15 years.</p> <p>Dear Sir,</p> <p>Many of the Main Modifications are welcome and justify the work that the Council, the Environment Agency and yourself have put in over two years in trying to make the Plan sound. The changes go a long way to explain “the horns of the dilemma” upon which you found yourself.</p> <p>The following Main Modifications are particularly welcome:</p> <ul style="list-style-type: none"> • the removal of 5 strategic site allocations due to flood risk • the imposition of a requirement to delay 11 further strategic site allocations until a safe route for access and egress can be provided - 8 in Staines and 3 in Shepperton • the imposition of a constraint to some strategic site allocations restricting development to the built footprint • a completely revised policy E3 on managing flood risk and significantly updated evidence base for flooding <p>However, a couple of sticking points remain, principally on groundwater flood risk, and I hope that the detailed comments below might prove useful.</p>
Attachments
<p>Link to comment:</p> <p>https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021173&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15919508%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D11</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM15
Respondent: Mr Darren Oakley [RPS Consulting] (59328481)
Organisation: Bewley Homes
Response ID: 13020373 (CO/83)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No Response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No Response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>MM14 and MM15 (draft housing trajectory)</p> <p>Response:</p> <p>These modifications relate to the proposed housing trajectory, shown in Appendix D1 and D2 to the schedule of modifications. The modifications relate to the plan period trajectory.</p> <p>National policy makes clear that planning policies should identify a supply of:</p> <ul style="list-style-type: none"> a) specific, deliverable sites for years one to five of the plan period, and b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan (NPPF 2021, para 68) <p>In maintaining the supply of land, plans should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies; and provision should be made for a suitable buffer of 5%,10%, or 20% where there has been significant under-delivery of housing, moved forward from later in the plan period (NPPF 2021, para 74).</p> <p>Whilst there is some commentary provided on the expected rate of completions on a plan period basis, very little explanation is provided which demonstrates there is likely to exist a five-year supply of deliverable sites from the start of the plan (2024). It is unclear from the modifications, or the pre-submission version of the Plan, whether a sufficient number of sites has been identified to provide a minimum of five years' worth of housing land, contrary to national policy.</p> <p>Similarly, the housing trajectory summary graph (Appendix D2) identifies the standard method annual requirement, plus a 20% buffer (shown as a black line) for the years 2024-2029, the first five years of the modified plan period. The Council has, rightly, highlighted the 20% buffer in the requirement because there has been significant under-delivery of housing over the previous three years in Spelthorne, as evidenced in the latest Housing Delivery Test score (65%) 1 . The base standard method for the first five years is 3,155 dwellings (631 x 5). When adding the 20% buffer, that gives an annual requirement of 757 dpa; over the five years, the requirement is 3,786 dwellings.</p> <p>Against these requirements, the housing trajectory summary table (Appendix D1) identifies projected completions totalling 3,794 during the first five years of the plan. The supply is projected to exceed the 'base' requirement. However, when compared to the correct requirement for the first five years in line with national policy ('SM + 20% buffer'), the exceedance falls to just 8 dwellings. This represents a minimal measure of contingency in the supply against requirements in the early years of the Plan.</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

It is important to note that actual housing delivery in recent years in Spelthorne has also been notably deficient. This is evident in the outcome against the Government's Housing Delivery Test (for the period 2020-2023). Over the last three years (2020-2023), 992 net new dwellings have been built in the district, and average of 331 per year.

Given the tightness in the supply projections, the modified housing trajectory (Appendix D1 and D2) makes virtually no allowance for flexibility or potential non-implementation against the targets, which has been a characteristic of delivery performance in Spelthorne in recent years. In terms of effectiveness, the Plan also does not clearly set out what sources will comprise the deliverable supply in the first five years of delivery. We must conclude there can be little confidence that the Council will meet even the baseline requirement figure, 631 dpa, given recent performance, let alone the higher requirement the Council should be planning for in the early years. The housing trajectory and the approach to five-year supply is not soundly-based.

On this basis, we contend the modifications to the projected supply of housing, proposed through MM14, MM15 (and MM13) do not go far enough in providing the necessary leeway should delivery of allocated sites not come forward at the rate anticipated in the trajectory, resulting in a shortfall against planned targets. We respectfully request the Inspectors to consider allocating additional land in the Plan to reduce the risk of plan failure in the early years on deliverability grounds, and thus make the Plan soundly-based.

1 Housing Delivery Test: 2023 measurement

Question 4: Please use this text box to provide any other comments.

Please find attached the responses to the main modifications consultation. Any queries with the details submitted, please let us know by return.

Attachments

Attachment Name: Cover letter - PMM response obo Bewley Homes May 2025.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198513/PDF/-/Cover%20letter%20-%20PMM%20response%20obo%20Bewley%20Homes%20May%202025.pdf
Attachment Name: PMMs - Spelthorne Local plan obo Bewley Homes.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198514/PDF/-/PMMs%20-%20Spelthorne%20Local%20plan%20obo%20Bewley%20Homes.pdf
Attachment Name:	
Attachment Name:	

Link to comment:

<https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020373&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15919508%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D11>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM15	
Respondent: Flora Macleod [Savills] (41643681)	
Organisation: Wates Developments	
Response ID: 13020661 (CO/92)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No Response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No Response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
See Sections (A) – (C) below	
Question 4: Please use this text box to provide any other comments.	
In response to the main modifications to the Local Plan, please see attached our representations of Wates Developments.	
Attachments	
Attachment Name: SBC - Wates Main Mods Reps-submission.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198557/PDF/-/SBC%20-%20Wates%20Main%20Mods%20Reps-%20submission.pdf
Attachment Name: Appendix 1- draft site allocation policy.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198558/PDF/-/Appendix%201-%20draft%20site%20allocation%20policy.pdf
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020661&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15919508%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D11	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM15
Respondent: Mrs Kath Sanders (19813377)
Organisation:
Response ID: 13021205 (CO/109)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No Response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No Response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
No Response
Question 4: Please use this text box to provide any other comments.
<p>3. STRATEGY AND STRATEGIC POLICIES</p> <p>MM15</p> <p>Other: Inconsistency in “justification” text. Appendix D2 shows 16 years (to 2039/40) not 15 years.</p> <p>Dear Sir,</p> <p>Many of the Main Modifications are welcome and justify the work that the Council, the Environment Agency and yourself have put in over two years in trying to make the Plan sound. The changes go a long way to explain “the horns of the dilemma” upon which you found yourself.</p> <p>The following Main Modifications are particularly welcome:</p> <ul style="list-style-type: none"> • the removal of 5 strategic site allocations due to flood risk • the imposition of a requirement to delay 11 further strategic site allocations until a safe route for access and egress can be provided - 8 in Staines and 3 in Shepperton • the imposition of a constraint to some strategic site allocations restricting development to the built footprint • a completely revised policy E3 on managing flood risk and significantly updated evidence base for flooding <p>However, a couple of sticking points remain, principally on groundwater flood risk, and I hope that the detailed comments below might prove useful.</p>
Attachments
<p>Link to comment:</p> <p>https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021205&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partID%3D15919508%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3D%26%26sort%3DsubmitDate%26dir%3Ddesc%26startRow%3D1</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM16	
Respondent: Flora Macleod [Savills] (41643681)	
Organisation: Wates Developments	
Response ID: 13020629 (CO/91)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No Response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No Response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
We consider Land East of Vicarage Road should fall within the specific sites that are allocated or excluded from the Green Belt, for reasons set out below See Sections (A) – (C)	
Question 4: Please use this text box to provide any other comments.	
In response to the main modifications to the Local Plan, please see attached our representations of Wates Developments.	
Attachments	
Attachment Name: SBC - Wates Main Mods Reps-submission.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198554/PDF/-/SBC%20-%20Wates%20Main%20Mods%20Reps-%20submission.pdf
Attachment Name: Appendix 1- draft site allocation policy.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198555/PDF/-/Appendix%201-%20draft%20site%20allocation%20policy.pdf
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020629&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15919508%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D11	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM17	
Respondent: mr Ian Beardsmore (41415905)	
Organisation:	
Response ID: 13017941 (CO/15)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>MM17 'Local Plan Review'</p> <p>Since this review is likely to reveal a need for further housing (Ref: rolling requirement identified in MM17). It will also need to be assessed whether some of this new requiremnt needs to be front loaded. This could be challenging. One option for this should be the ability to bring forward mid-term requirement already established in the (by then) agreed plan.</p> <p>When new developments are created any community space within them should be considered to see whether they qualiy as Local Green Space</p>	
Question 4: Please use this text box to provide any other comments.	
Enjoy !	
Attachments	
Attachment Name: LP IB 01 MM17 Local Plan Review.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197150/PDF/-/LP%20IB%2001%20MM17%20Local%20Plan%20Review.pdf
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13017941&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15920212%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM17
Respondent: Mr Nigel Rowe (33516193)
Organisation: Riverside Residents (Staines) Coalition
Response ID: 13018485 (CO/24)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
No response
Question 4: Please use this text box to provide any other comments.
<p>I attach herewith our response to the Council's consultation for your consideration.</p> <p>2 Flood risk</p> <p>2.1 Three sources of flood risk impact on Staines: From the river (fluvial), surface water run-off (pluvial), and groundwater. A good deal of solid data is available on flood risk from the river, for which the Environment Agency is the statutory consultee. The same is broadly true for surface water run-off, for which Surrey County Council is the statutory consultee. Until very recently, incredibly little was known about flood risk from groundwater in Staines (and elsewhere in the borough), perhaps not least because there is, remarkably, no statutory consultee in the planning system with responsibility to monitor and advise on this source.</p> <p>2.2 Groundwater flood risk is particularly acute in Staines because the town is built on a thin layer of gravel, varying in thickness from 1 to 5 metres, sitting on impermeable London clay. The gravel is particularly clean (ie lacking in clay) in the Staines area, facilitating more rapid transit of water through it and thus exacerbating the problem. Putting to one side whether it is necessary or sensible to build tower blocks of flats on sites that will flood, particular community concerns relate to the consequences of such developments. These include both their potential to increase flood risk for others in the area and the cost, even availability, of property insurance.</p> <p>2.3 Research last year by Royal Holloway, University of London, determined that groundwater was a source of flood risk in Staines at least equal to that from the river and surface water run-off (with the latter in fact adding to the problem with groundwater). When initial results of the research were first outlined in May 2024, Spelthorne Borough Council chose publicly to discount its findings because they had not been peer reviewed. Perhaps an added motivation for taking this position was the realisation that, if validated, the research would bring into serious question the Council's development plans for Staines.</p> <p>2.4 The research, with its findings unaltered, achieved independent scientific peer review validation in March 2025 (after completion of the Inspector's public</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

examination of the Plan) in the prestigious Journal of Flood Risk Management.
The full report is attached ([click here](#)).

2.5 In summary: The research shows how powerful, wildly variable and critically important groundwater flows are through the thin gravel substrate on which Staines is built; how they act independently of, but add materially to, flood-risk from the river and surface water run-off; how and where they produce discrete zones of significantly heightened flood risk. Barriers in the gravel substrate from the foundations and basements of existing buildings have significantly increased flood risks in Staines. New barriers, however shallow or deep, from new developments will add to the problem ... and the problem will therefore be further exacerbated a) the more there are of these new barriers both individually and as disturbed water-flows from them interact with each other, and b) from climate change.

2.6 As noted earlier, 5 sites for major developments have been removed from the Plan because of flood risk, and the Council originally said others had been delayed to later in the Plan period to take advantage of the proposed River Thames Scheme. However, and putting aside the questions now being raised publicly about whether the Scheme will go ahead within the timeline of the Local Plan, the Royal Holloway research also shows that this Scheme will have no material impact on the significant flood risk from groundwater.

2.7 The 5 sites of the original 19 proposed for development in Staines were completely withdrawn because the Environment Agency had identified them as being suitable only for water compatible development (as defined in the National Planning Policy Framework). It is now clear from the Royal Holloway research that, in addition to these sites, others are equally vulnerable to flood risk because of what is now known about groundwater impact and should be reconsidered in the proposed 'immediate review' of the Plan. The need for this also became very evident to those attending the presentation of the research by its lead author Dr Jonathan Paul at a public meeting on 6 May ([click here](#) for presentation slides). One of the community's concerns about the Plan's implementation in Staines is the Council's apparently ambiguous and casual attitude to flood risk. For example, the Council removed the massive riverside Bridge Street car park site (ST4/002) from the Plan explicitly "for residential and hotel purposes" (at the Environment Agency's insistence because of flood risk). Within days of seeking the Planning Inspector's approval to withdraw the site from the Plan, the Council signed a 250-year lease agreement with a developer for a large hotel (which would become the biggest building by far in Staines) on the site.

2.8 Recommended imperatives: Given the extreme importance and critically unpredictable impact of flood risk from groundwater in Staines, and the demonstrated potential for the foundations of new developments (however shallow or deep) to increase flood risk in the area around them:

- * Major developments proposed for Staines in years 1 – 5 of the Plan should be subject to reconsideration as part of the agreed 'immediate review' of the Plan.
- * Also as part of the 'immediate review', consideration should be given to strengthening and clarifying policies to ensure there is no risk of flooding from new developments to others in the area (not just that the risk should be mitigated).
- * Any and all proposed new developments in Staines must (not should as in the proposed revision to the Level 1 SFRA referred to in policy E3 on managing flood

Representations Received in Response to Main Modifications Consultation (in MM number order)

risk) be subject to a) an independent hydrogeological risk assessment and b) a contractual undertaking by the developer that they accept full legal responsibility for any increased flood risk created for others in the area.

5 Conclusion

5.1 The overwhelming and now independently validated evidence on flood risk (post the conclusion of the Planning Inspector's public examination of the Local Plan and proposed Main Modifications), and the continuing lack of evidence of a credible Infrastructure Delivery Plan, means: 1) the Local Plan's intentions for Staines for years 1-5 should be reconsidered as part of the 'immediate review' demanded by the Planning Inspector, and 2) this review must accommodate the recommended imperatives in this submission paper and the attachment referenced in 1.3.

Attachments

Attachment Name: LOCAL PLAN- RRSC PUBLIC CONSULTATION SUBMISSION 7 MAY pdf.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197294/PDF/-/LOCAL%20PLAN-%20RRSC%20PUBLIC%20CONSULTATION%20SUBMISSION%207%20MAY%20pdf.pdf
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13018485&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15920212%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM17	
Respondent: Craig Hatton [Network Rail] (59464353)	
Organisation: Network Rail	
Response ID: 13018933 (CO/38)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>Strategy and Strategic Policies (MM17)</p> <p>NR supports the inclusion of the new Policy ST3 Local Plan Immediate Review as provided through MM17. NR notes the detail of the new Policy within Appendix A as part of this consultation. To ensue effectiveness of the new Policy, it is essential that SBC engages with infrastructure providers such as NR, as well as adjoining and nearby authorities. In assessing all policies, this should also include all infrastructure-related policies alongside the necessary engagement to ensure these policies are up-to-date and clearly identify all infrastructure needs. To facilitate this, there should be a commitment to review and update at least annually the Infrastructure Delivery Plan (IDP), as this is an iterative document that supports the review of the Local Plan and its policies through setting out infrastructure requirements to facilitate growth and where any funding or improvements could be required.</p> <p>As a statutory consultee, NR engages both on Local Plan policies and planning applications that are considered to have an impact on the railway.</p>	
Question 4: Please use this text box to provide any other comments.	
Please see attached NR representations to the consultation, ending 15 May 2025.	
Attachments	
Attachment Name: Network Rail response to Spelthorne Local Plan Main Modifications April 2025 (1).pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197627/PDF/-/Network%20Rail%20response%20to%20Spelthorne%20Local%20Plan%20Main%20Modifications%20April%202025%20_1_.pdf
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13018933&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15920212%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM17
Respondent: Miss Lanica Agnew [Stantec] (58908417)
Organisation: SEGRO
Response ID: 13019637 (CO/60)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>4 Policy ST3 – Local Plan Immediate Review</p> <p>4.1 Main Modification Reference Number: MM 17</p> <p>4.1.1 SEGRO welcome the inclusion of the revised policy, which was the subject discussion at the recent Examination hearings. We welcome Policy ST3: Local Plan Early Review, which is included to ensure it remains compliant with national policy. Spelthorne Council have confirmed their commitment to an immediate Local Plan review to ensure the Plan is positively prepared and meets their objectively assessed housing and employment needs.</p> <p>4.1.2 The proposed wording reads as follows:</p> <p>“The Local Planning Authority will undertake a review of the Local Plan 2024-2039 immediately following the adoption of this Plan. An updated or replacement plan will be submitted for examination no later than two years from the date of adoption of this Plan. The updated or replacement Local Plan will cover all policies (save for matters of development management) but will focus on the following matters that have been specifically identified during the preparation and examination of this plan:</p> <ul style="list-style-type: none"> • Housing requirement for the whole Borough based on the most up-to-date national guidance (as at the date of submission). • Monitoring housing delivery including the progress and implementation of sites allocated in this plan to inform the Local Plan review. • Employment requirement for the whole Borough based on the most up-to-date Housing and Employment Development Needs Assessment, and addressing any resultant need to allocate employment floorspace. • Updating the Gypsy Traveller and Travelling Show People Needs Assessment, in light of the update to Planning Policy for Traveller Sites (2024). • Assessment of each policy and its conformity to the NPPF.” <p>4.1.3 The replacement Plan will secure levels of growth that accord with Government policy.</p> <p>4.1.4 The review will also serve to build upon existing strong, working relationships with adjoining and nearby authorities and may result authorities and may result in the preparation of a joint evidence or policies based upon wider functional geographies.</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

4.1.5 SEGRO agree that the policy will allow flexibility in the Local Plan and as set out in the supporting text, the Council appreciates that there may be a change in circumstances that we cannot currently foresee or are yet to understand the full implications of (i.e. Covid-19 and Brexit) but which have a substantial impact upon the Borough. This might be changes to the way in which the planning system operates, structural changes to the population or the way we live, work or spend our leisure time in response to for example climate change or any other future event. 4.1.6 The Employment requirement for the whole Borough based on the most up-to-date Housing and Employment Development Needs Assessment is needed, to include market signals given this current Plan fails to do this. We invite the Inspector to include this in their list of areas to be addressed in the future in their Report on the Local Plan to the Council.

4.1.7 Based on the above, SEGRO support the proposed new wording.

4.1.8 In line with PPG, SEGRO requests participation and engagement on the future work related to the Local Plan review considering the employment requirements for the Borough, and its neighbours.

Question 4: Please use this text box to provide any other comments.

Please see attached Main Modifications Representations on behalf of SEGRO for Land at Sunbury. I also attach three Appendices.

Attachments

Attachment Name: 333101940 250508 A3 Land at Sunbury Main Modification Representations (FINAL).pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198156/PDF/-/333101940%20250508%20A3%20Land%20at%20Sunbury%20Main%20Modification%20Representations%20_FINAL_.pdf
Attachment Name:	

Link to comment:
<https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019637&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15920212%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM17
Respondent: Mr darren oakley [RPS Consulting] (59328481)
Organisation: Bewley Homes
Response ID: 13020405 (CO/84)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>MM17 Policy ST3 (new policy)</p> <p>Response:</p> <p>MM17 introduces a new policy (ST3) relating to an immediate review of the Plan once it is adopted. The Council confirms they are committed to meeting this policy. Appendix A provides the full policy text in draft.</p> <p>We agree with MM17 in principle. Nonetheless, the draft policy sets out a commitment to ‘assess each policy and its conformity to the NPPF 2021’. It is very likely that the National Development Management Policies (NDMPs) system will be in place or towards being put in place at some point in the next two years or so, which is likely to coincide with the preparation of the updated Local Plan which will be progressed through the new plan-making system under the Levelling Up and Regeneration Act 2023 (LURA). This will also coincide with a planned overhaul of the NPPF so that it focuses solely on matters relating to plan-making. Plans prepared under the new system must also have regard to the NDMP 2 and must not be inconsistent with or duplicate any policies in the NDMP 3 .</p> <p>The considerations at the national level highlighted here, amongst others, will inevitably impact on the scope and content of the updated Local Plan. However, the draft policy does not reflect on the likely direction of the planning system at a national level, which includes the likely narrowing of the range of policies that will be allowed to form part of Local Plans.</p> <p>Furthermore, the draft policy states that the replacement plan will secure levels of growth that accord with Government policy. However, this does not reflect on the requirement under paragraph 78c of the current NPPF 2021, in particular the 1 July 2026 deadline whereby a 20% buffer should be applied to the supply of specific deliverable sites in circumstances (such as Spelthorne) where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of this Framework (in this case the 2021 version) and whose annual average housing requirement is 80% or less of the most up to date local housing need figure calculated using the standard method.</p> <p>The draft policy ST3 should be modified in order to align with national policy and the relevant legislative changes underpinning them, as highlighted in this response.</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

<p>Furthermore, the policy does include any sanctions should be Council fail to meet the two-year deadline for submission. The policy is not clear and unambiguous, contrary to national policy (NPPF 2021, para 16) and so is not soundly-based. The policy should be modified to explain that should be Council miss the two-year deadline for submission, then the policies in the Local Plan should be deemed out of date.</p> <p>2 section 15CA(5)© of the 2004 Act</p> <p>3 section 15C(7)(b) of the 2004 Act</p>	
<p>Question 4: Please use this text box to provide any other comments.</p>	
<p>Please find attached the responses to the main modifications consultation. Any queries with the details submitted, please let us know by return.</p>	
<p>Attachments</p>	
Attachment Name: Cover letter - PMM response obo Bewley Homes May 2025.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198516/PDF/-/Cover%20letter%20-%20PMM%20response%20obo%20Bewley%20Homes%20May%202025.pdf
Attachment Name: PMMs - Spelthorne Local plan obo Bewley Homes.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198517/PDF/-/PMMs%20-%20Spelthorne%20Local%20plan%20obo%20Bewley%20Homes.pdf
Attachment Name:	
Attachment Name:	
<p>Link to comment:</p> <p>https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020405&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15920212%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1</p>	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM17	
Respondent: Flora Macleod [Savills] (41643681)	
Organisation: Wates Developments	
Response ID: 13020693 (CO/93)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
We support this Amendment	
Question 4: Please use this text box to provide any other comments.	
In response to the main modifications to the Local Plan, please see attached our representations of Wates Developments.	
Attachments	
Attachment Name: SBC - Wates Main Mods Reps-submission.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198559/PDF/-/SBC%20-%20Wates%20Main%20Mods%20Reps-%20submission.pdf
Attachment Name: Appendix 1- draft site allocation policy.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198560/PDF/-/Appendix%201-%20draft%20site%20allocation%20policy.pdf
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020693&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15920212%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM17
Respondent: Mrs Kath Sanders (19813377)
Organisation:
Response ID: 13021269 (CO/111)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
Yes
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>3. STRATEGY AND STRATEGIC POLICIES</p> <p>MM17 - Addition of new policy ST3: Local Plan Immediate Review (Appendix A)</p> <p>Rationale:</p> <p>Two points on the given text:</p> <p>1) Exclusion of “development management” matters - The text of CD037a (previous MM12(24)a) was revised during examination to say: “The replacement plan will cover all policies (save for matters of development management) ...”. NB This sentence was further revised in Appendix A to say: “The updated or replacement Local Plan will cover all policies (save for matters of development management)”. It is unclear what has been taken off the table for consideration by the exclusion of “development management” matters, and no rationale for this change has been given.</p> <p>Recommendation: ALL policies in the Local Plan should be capable of review. As such, and given that no rationale is offered for the change, the text in brackets (“save for matters of development management”) should be removed.</p> <p>2) Exclusion of bullet point linked to EA Statement of Common Ground - The text of CD037a (previous MM12(24)a) included the extra bullet point: “Developing policy and site allocations in accordance with the Statement of Common Ground dated October 2024 agreed with the Environment Agency”. The SoCG with the EA dealt primarily with flood risk but this bullet point has been removed from the main modification at Appendix A (MM17) without explanation, and there is no direct reference to the need to consider flood risk in Policy ST3 (just oblique references in the supporting text to the environment, changes in circumstances and climate change). Flood risk has therefore seemingly been downgraded in policy ST3 since it was drafted.</p> <p>In fact, there is growing irrefutable evidence that proper consideration of flood risk is imperative for the borough, and indeed quite central to the deliverability of any plan where development is concentrated on flood plain.</p> <p>Recommendations: As such, at a minimum, the missing bullet point should be reinstated.</p> <p>The policy ST3 should, however, now be strengthened to reflect the now peer-reviewed evidence on groundwater flood risk in an urbanised catchment. NB The evidence was presented to the Council last year before being peer-reviewed so was generally known about in 2024. To be specific, a new bullet point should be added to the policy as follows:</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

“- Developing policy and site allocations in light of the latest evidence on groundwater flood risk in an urbanised catchment”

Furthermore, although beyond the remit of this Local Plan, the government must now recognise the need for urgent guidance in the planning system with regard to groundwater flood risk and assign the responsibility to a statutory consultee, consistent with fluvial and pluvial flood risk. See also commentary on Policy E3 below (MM81), and the replies from MHCLG and DEFRA in response to my FOIs regarding statutory consultees for groundwater flood risk forwarded under separate cover.

Question 4: Please use this text box to provide any other comments.

Dear Sir,

Many of the Main Modifications are welcome and justify the work that the Council, the Environment Agency and yourself have put in over two years in trying to make the Plan sound. The changes go a long way to explain “the horns of the dilemma” upon which you found yourself.

The following Main Modifications are particularly welcome:

- the removal of 5 strategic site allocations due to flood risk
- the imposition of a requirement to delay 11 further strategic site allocations until a safe route for access and egress can be provided - 8 in Staines and 3 in Shepperton
- the imposition of a constraint to some strategic site allocations restricting development to the built footprint
- a completely revised policy E3 on managing flood risk and significantly updated evidence base for flooding

However, a couple of sticking points remain, principally on groundwater flood risk, and I hope that the detailed comments below might prove useful.

Attachments

Attachment Name: IR Response IR2025 04982.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198856/PDF/-/IR%20Response%20IR2025%2004982.pdf
Attachment Name: IR2025 04256 response DEFRA FOI EIR response - stat consultees flood risk April 2025.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198857/PDF/-/IR2025%2004256%20response%20DEFRA%20FOI%20EIR%20response%20-%20stat%20consultees%20flood%20risk%20April%202025.pdf
Attachment Name: New response to your FOI request - Statutory consultees for flood risk (MHCLG).pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198858/PDF/-/New%20response%20to%20your%20FOI%20request%20-%20Statutory%20consultees%20for%20flood%20risk%20 MHCLG .pdf
Attachment Name: New response to your FOI request - Statutory consultees for flood risk (DEFRA).pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198859/PDF/-/New%20response%20to%20your%20FOI%20request%20-%20Statutory%20consultees%20for%20flood%20risk%20 DEFRA .pdf

Link to comment:

<https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021269&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partID%3D15920212%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartID%26dir%3Dasc%26startRow%3D1>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM17
Respondent: Ciaran Gunning [CBRE] (59327201)
Organisation: Tarmac Trading Ltd
Response ID: 13023957 (CO/164)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>MM17- Local Plan Immediate Review</p> <p>We welcome the introduction of Policy ST3 which is required for soundness. Below we have added some further revisions to ensure soundness with our full justification for this followed afterwards.</p> <p>The Local Planning Authority will undertake a review of the Local Plan 2024-2039 immediately following the adoption of this Plan. An updated or replacement plan will be submitted for examination no later than two years from the date of adoption of this Plan. The updated or replacement Local Plan will cover all policies (save for matters of development management) but will focus on the following matters that have been specifically identified during the preparation and examination of this plan:</p> <ul style="list-style-type: none"> - Housing requirement for the whole Borough based on the most up-to-date national guidance (as at the date of submission). - Monitoring housing delivery including the progress and implementation of sites allocated in this plan to inform the Local Plan review. - Employment requirement for the whole Borough based on the most up-to-date Housing and Employment Development Needs Assessment, and addressing any resultant need to allocate employment floorspace. - Updating the Gypsy Traveller and Travelling Show People Needs Assessment, in light of the update to Planning Policy for Traveller Sites (2024). - Assessment of each policy and its conformity to the NPPF. <p>The replacement plan will secure levels of growth that accord with Government policy. The review will also serve to build upon existing strong, working relationships with adjoining and nearby authorities and may result in the preparation of a joint evidence or policies based upon wider functional geographies.</p> <p>We have suggested that “save for matters of development management” is deleted to ensure consistency with the NPPF and, principally, the need for policies to be clearly written and unambiguous. By definition we would argue that all policies in the Local Plan to be adopted constitute Development Management Policies. We would argue that it is unclear what policies are being referenced in this exclusion and in this regard the caveat provides more hinderance than help in understanding the requirement of the policy. There also may need to be Development Management Policies that need to be updated to reflect the latest provision of the NPPF (2024) and/or any subsequent revisions to the PPG.</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

We would argue that the caveat would also run counter to the supporting text which states “The review will also need to take account of relevant national and local guidance and/or policies relating to design including matters such as character and heritage.” We would assume that design matters would be captured in the development management policies which would conflict with the suggestion that they matters do not need to be considered as set out in the policy text itself.	
Question 4: Please use this text box to provide any other comments.	
No response	
Attachments	
Attachment Name: Spelthorne Main Modifications Consultation Response - CBRE Ltd OBO Tarmac Trading Ltd.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1207831/PDF/-/Spelthorne
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13023957&nextURL=%2FMMconsultation%2FuserResponseSummary%3Fuid%3D59327201	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM17	
Respondent: Lauren Cadore [Iceni] (59392577)	
Organisation: Diocese of London	
Response ID: 13024245 (CO/173)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>d. MM17 Policy ST3 Local Plan Immediate Review</p> <p>Proposed Main Modification MM17 includes the addition of new Policy ST3: Local Plan Immediate Review. This policy sets out the provisions for the LPA to conduct a review of the Local Plan 2024-2039 immediately following the adoption of the Plan with an updated plan submitted not later than two years from the date of adoption.</p> <p>Given the context of the emerging Local Plan in regards to Policy ST2 (MM10 and MM11) which states that the new housing requirement for the borough is 631 units per annum, below the revised standard method requirement of 788 units per annum. We consider the inclusion of MM17 critical as part of the emerging Local Plan. We support the Councils proposals to enact an immediate review of the Local Plan to ensure that the Local Plan housing requirement is based on the most up to date national guidance and the revised standard methodology. The inclusion of this policy will enable the housing requirement to be updated where necessary. This change is considered to make the Local Plan sound in relation to the effectiveness, national policy and positively prepared tests of soundness.</p>	
Question 4: Please use this text box to provide any other comments.	
No response	
Attachments	
Attachment Name: 250508 Main Modifications Representations May 2025 Final.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1207869/PDF/-/250508%20Main%20Modifications%20Representations%20May%202025%20Final.pdf
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13024245&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D%26repIDstyle%3Dstarts%26repStatus%3DP%252CM%252CR%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Foffice%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DmodifyDate%26dir%3Ddesc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM22	
Respondent: Angela Brooks [Fisher German LLP] (59472033)	
Organisation: National Grid Energy Transmission (NGET)	
Response ID: 13019477 (CO/55)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
National Grid Electricity Transmission (NGET) has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the attached representation with regard to the current consultation on the above document.	
Attachments	
Attachment Name: Spelthorpe NGET Response Letter.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198114/PDF/-/Spelthorpe%20NGET%20Response%20Letter.pdf
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019477&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15920468%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3D%26%26sort%3DsubmitDate%26dir%3Ddesc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM25
Respondent: Miss Lanica Agnew [Stantec] (58908417)
Organisation: SEGRO
Response ID: 13019669 (CO/61)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>5 Policy PS2: Designing Places and Spaces</p> <p>5.1 Main Modifications Reference Number: MM 25</p> <p>5.1.1 Policy PS2 refers to the National Model Design Code rather than the Spelthorne Design Code SPD explicitly. It is explained that this is to have regard to future supplementary documents ahead of the publication of the forthcoming Local Plan.</p> <p>5.1.2 The Council has proposed the following wording for Policy PS2 as:</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:</p> <ul style="list-style-type: none"> • Will create buildings and places that are attractive with their own district 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; • Have been developed in accordance with the principles set out in the National Model Design Code and have regard to any design policies and codes which are produced.” <p>5.1.3 SEGRO objects to the proposed modified wording to Policy PS2 and consider that the inclusion of the word “will” undermines the requirement and does not give developers assurance of this requirement.</p> <p>5.1.4 Stantec, on behalf of SEGRO, submitted comments to a recent consultation on the Spelthorne Design Code SPD (please see Appendix 2). Planning Policy Officers have formally confirmed that at this stage, the Design Code SPD has not coded for Employment uses. We include the Council’s confirmation at Appendix 3.</p> <p>5.1.5 If any future review of this is undertaken, SEGRO would welcome the opportunity to participate in any consultation session. It is considered that working with stakeholders and developers to consider market demand, including the scale, height, proportions, building lines, layout, materials and other characteristics for employment uses in order these considerations are included in a future SPD and such buildings can be delivered in construction stage and occupied.</p> <p>Requested Changes</p> <p>5.1.6 We ask the main modification includes the Council’s confirmation that the Design Code SPD does not apply to employment uses.</p>
Question 4: Please use this text box to provide any other comments.

Representations Received in Response to Main Modifications Consultation (in MM number order)

Please see attached Main Modifications Representations on behalf of SEGRO for Land at Sunbury. I also attach three Appendices.	
Attachments	
Attachment Name: 333101940 250508 A3 Land at Sunbury Main Modification Representations (FINAL).pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198158/PDF/-/333101940%20250508%20A3%20Land%20at%20Sunbury%20Main%20Modification%20Representations%20 FINAL .pdf
Attachment Name: RE Design Code SPD consultation.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198176/PDF/-/RE%20Design%20Code%20SPD%20consultation.pdf
Attachment Name: Appendix 2 - Spelthorne Design Code SPD Letter.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198177/PDF/-/Appendix%202%20-%20Spelthorne%20Design%20Code%20SPD%20Letter.pdf
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019669&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15921076%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM25	
Respondent: Mrs Nikki Nicholson [Surrey County Council] (49092289)	
Organisation: Surrey County Council	
Response ID: 13019797 (CO/65)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>Policy PS2: Designing Places and Spaces</p> <p>In MM25 we would suggest the inclusion of “Healthy Streets for Surrey” in text. Suggest the policy is amended as follows:</p> <p>“have been developed in accordance with the principles set out in the National Model Design Code, Healthy Streets for Surrey, and have regard to any design policies and codes which are produced.</p>	
Question 4: Please use this text box to provide any other comments.	
Please find attached the SCC response to the above consultation,	
Attachments	
Attachment Name:	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198310/PDF/-/SCC_Response_Spelthorne_Main_Modifications_Consultation_May_2025.pdf
Attachment Name:	
Link to comment:	
https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019797&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15921076%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM27	
Respondent: Mr Alan Byrne [Historic England] (19549377)	
Organisation: Historic England	
Response ID: 13018805 (CO/34)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
MM27- support the new paragraph 4.24 relating to the requirement to consider detailed design and the need for a Design Review Panel that 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.	
Question 4: Please use this text box to provide any other comments.	
I attach Historic England's response to the above consultation.	
Attachments	
Attachment Name: Spelthorne Local Plan Main Modifications Consultation (HE response)- 12.05.25.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197555/PDF/-/Spelthorne%20Local%20Plan%20Main%20Modifications%20Consultation%20HE%20response-12.05.25.pdf
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment:	
https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13018805&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15921076%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM28	
Respondent: Mr Nigel Rowe (33516193)	
Organisation: Riverside Residents (Staines) Coalition	
Response ID: 13018741 (CO/32)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>4 Protecting heritage assets and sensitive areas</p> <p>4.1 Although perhaps of limited concern in relation to whether the developments envisaged for Staines can be delivered physically, they certainly cannot be delivered and at the same time be consistent with the Council's existing policies on the protection of heritage assets, the Conservation Area and riverfront. This is due principally to the removal from the Plan of the Staines Development Framework and all its provisions for 'zoning' (not least to limit the height of new developments in sensitive areas/sites).</p> <p>4.2 It seems that these aspects are now expected to be included in a Design Code (currently under development) which may or may not have equal force with the Local Plan. However, they can only be given equal force if the demands of the Design Code and the Local Plan are compatible. As things currently stand, the demands of the Local Plan trump whatever aspirations may be enshrined in a Design Code.</p> <p>4.3 Recommended imperative: Delivery of new major developments on sensitive sites in Staines should be subject to the demands of the Design Code (due for completion and approval before the autumn of 2025).</p>	
Question 4: Please use this text box to provide any other comments.	
I attach herewith our response to the Council's consultation for your consideration.	
Attachments	
Attachment Name: LOCAL PLAN- RRSC PUBLIC CONSULTATION SUBMISSION 7 MAY pdf.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197324/PDF/-/LOCAL%20PLAN-%20RRSC%20PUBLIC%20CONSULTATION%20SUBMISSION%207%20MAY%20pdf.pdf
Attachment Name:	
Link to comment:	
https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13018741&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15921396%26repIDstyle%3Dstarts%26repSta	

Representations Received in Response to Main Modifications Consultation (in MM number order)

[tus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1](#)

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM28	
Respondent: Mrs Nikki Nicholson [Surrey County Council] (49092289)	
Organisation: Surrey County Council	
Response ID: 13019893 (CO/68)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>Policy PS3: Heritage, Conservation and Landscape</p> <p>The two modifications proposed to policy PS3 (MM28 and MM29) are welcome. These will recognise the value of Locally Listed structures and seek to protect them through the mechanism of the Local Plan. Locally Listed structures have little statutory protection unlike nationally designated heritage assets, so this provision will be useful clarification for applicants on the council's intentions towards its undesigned, but nevertheless locally significant, heritage assets.</p>	
Question 4: Please use this text box to provide any other comments.	
Please find attached the SCC response to the above consultation,	
Attachments	
Attachment Name:	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198319/PDF/-/SCC_Response_Spelthorne_Main_Modifications_Consultation_May_2025.pdf
Attachment Name:	
Link to comment:	
https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019893&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15921396%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM29	
Respondent: Mr Alan Byrne [Historic England] (19549377)	
Organisation: Historic England	
Response ID: 13018837 (CO/35)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
MM29 - support the insertion of a paragraph to Policy PS3 that states 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.	
Question 4: Please use this text box to provide any other comments.	
I attach Historic England's response to the above consultation.	
Attachments	
Attachment Name: Spelthorne Local Plan Main Modifications Consultation (HE response)-12.05.25.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197560/PDF/-/Spelthorne%20Local%20Plan%20Main%20Modifications%20Consultation%20 HE%20response -12.05.25.pdf
Attachment Name:	
Link to comment:	
https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13018837&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15921396%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM29	
Respondent: Mrs Nikki Nicholson [Surrey County Council] (49092289)	
Organisation: Surrey County Council	
Response ID: 13019925 (CO/69)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>Policy PS3: Heritage, Conservation and Landscape</p> <p>The two modifications proposed to policy PS3 (MM28 and MM29) are welcome. These will recognise the value of Locally Listed structures and seek to protect them through the mechanism of the Local Plan. Locally Listed structures have little statutory protection unlike nationally designated heritage assets, so this provision will be useful clarification for applicants on the council's intentions towards its undesigned, but nevertheless locally significant, heritage assets.</p>	
Question 4: Please use this text box to provide any other comments.	
Please find attached the SCC response to the above consultation,	
Attachments	
Attachment Name:	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198321/PDF/-/SCC_Response_Spelthorne_Main_Modifications_Consultation_May_2025.pdf
Attachment Name:	
Attachment Name:	
Link to comment:	
https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019925&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15921396%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM31	
Respondent: mr Ian Beardsmore (41415905)	
Organisation:	
Response ID: 13017973 (CO/16)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>MM31 'Staines'</p> <p>Clarity is needed between points 2&3, where the Staines Conservation Area appears to be seperate to the area covered by design code proposals. The implication here is that possible future legislation on design codes will give them the power to override or at least influence policy in key areas such as height and density. This potentially could have very serious ramifications for housing provison projections especially in Staines. As such it has to be a matter of great concern.</p> <p>More generally why is the issue of a design code being included as part of Staines? Surely any design code should be Borough wide. It may be quite legitimate for Staines to have a section to itself, but a design code provision for Staines should only ever be as a sub-set of a Borough wide design code.</p>	
Question 4: Please use this text box to provide any other comments.	
Enjoy !	
Attachments	
Attachment Name: LP IB 02 MM31 Staines.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197165/PDF/-/LP%20IB%2002%20MM31%20Staines.pdf
Attachment Name:	
Attachment Name:	
Link to comment:	
https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13017973&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15921748%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM31	
Respondent: Craig Hatton [Network Rail] (59464353)	
Organisation: Network Rail	
Response ID: 13018965 (CO/39)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>Policy SP1: Staines upon Thames (MM31)</p> <p>NR welcome the clarity provided by the amendment to the Policy to reflect SBC's approach to the Borough's main town centre. The clear identification of the importance of rail links from Staines station to London, Reading and Windsor within the Policy is also supported. Additionally, the opportunity around rail access to Heathrow Airport is also noted. At present, NR has no immediate plans or available funding for any new infrastructure or facilities that may be required to facilitate direct rail access to Heathrow. Further discussion on how this could be achieved is welcome and this should also form a key part of the IDP and any other relevant evidence base documents.</p> <p>SBC should also ensure that any existing rail infrastructure and chords as well as additional land that may be used to facilitate future rail connections are safeguarded as part of a future Local Plan Review. NR welcomes discussion and engagement with SBC and other stakeholders on this at an early stage.</p>	
Question 4: Please use this text box to provide any other comments.	
Please see attached NR representations to the consultation, ending 15 May 2025.	
Attachments	
Attachment Name: Network Rail response to Spelthorne Local Plan Main Modifications April 2025 (1).pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197628/PDF/-/Network%20Rail%20response%20to%20Spelthorne%20Local%20Plan%20Main%20Modifications%20April%202025%20_1_.pdf
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment:	
https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13018965&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3Fagent	

Representations Received in Response to Main Modifications Consultation (in MM number order)

[UID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15921748%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1](#)

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM31
Respondent: Mrs Kath Sanders (19813377)
Organisation:
Response ID: 13021301 (CO/112)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
Yes
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>5. SPATIAL POLICIES</p> <p>MM031 - Amend wording to whole policy SP1: Staines-upon-Thames (Appendix B)</p> <p>Rationale:</p> <p>Two points on the given text:</p> <p>1) Weakened protection for the conservation area and sensitive sites by the removal of zoning proposals</p> <p>Rationale: The “zoning approach” sought to limit the impact of new development on sensitive areas but fell away as a consequence of the agreement by the Council to remove the Staines Development Framework from the Local Plan evidence base. The Council thereafter chose not to include any zoning directly in the Local Plan itself, promoting in its place the delivery of a Design Code, developed in accordance with the principles set out in the National Model Design Code. The Design Code has yet to be properly consulted on and may be approved later this year. It is, however, unclear at this stage a) what protection it will offer sensitive areas in terms of limiting heights and densities of new major developments, and b) which document will prevail where there are inconsistencies between the Local Plan and any Design Code.</p> <p>Recommendation: Major developments in Staines proposed for Years 1-5 with a potential impact on sensitive areas should be delayed until the Design Code has been approved.</p> <p>2) Continued inclusion of reference to the Council’s “preferred approach” regarding Southern Light Rail (over Heathrow Southern Rail) reflects officers’ “optimism bias” which is inconsistent with members’ views expressed in the extraordinary Business, Infrastructure & Growth meeting of 16th September 2024 - see https://democracy.spelthorne.gov.uk/ieListDocuments.aspx?CId=329&MeetingId=4634.</p> <p>Rationale: Notwithstanding the explanation already provided by officers (that the existing decision from September 2019 holds, given that there is no decision otherwise), there is a paucity of information on the Council’s own Southern Light Rail proposal compared to Heathrow Southern Rail proposal. The information in the public domain for Southern Light Rail still appears to be at the “concept” stage after 7 years of first being raised in 2018. Furthermore, the working group to determine the Council’s current position has been strung out for what will be a year this autumn, despite the fact that all other stakeholders on the Heathrow Area Transport Forum (HATF) agreed in the summer of 2024 to support the alternative Heathrow Southern Rail proposal and wrote accordingly to the Secretary of State for Transport in August 2024 - https://www.hatf.org.uk/wp-content/uploads/2024/08/Heathrow-Southern-Rail-HATF-letter-to-SoS.pdf.</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

<p>In any event, no land has been safeguarded for either proposal and neither is likely to be built during the lifetime of this Local Plan. As such, and similar to the EA insisting that the Plan can't rely on the River Thames Scheme (for which land is being safeguarded), inclusion of any preference as regards Southern Rail Access to Heathrow, and any benefit accruing therefrom, is premature.</p> <p>Recommendation: Given that the working group is likely to report by the end of 2025, around the suggested time of adoption of this Local Plan and the launch of the "immediate review", the fact that no other stakeholders have indicated support, the lack of safeguarded land, and the unlikelihood of any scheme being built during the plan period, it would be prudent to exclude the preference for the Southern Light Rail scheme and leave this matter more properly for the "immediate review".</p>	
<p>Question 4: Please use this text box to provide any other comments.</p>	
<p>Other: Typo (x2) - The last line of part 2) and the first line of part 3) should read "policies" not "polices".</p> <p>Dear Sir,</p> <p>Many of the Main Modifications are welcome and justify the work that the Council, the Environment Agency and yourself have put in over two years in trying to make the Plan sound. The changes go a long way to explain "the horns of the dilemma" upon which you found yourself.</p> <p>The following Main Modifications are particularly welcome:</p> <ul style="list-style-type: none"> • the removal of 5 strategic site allocations due to flood risk • the imposition of a requirement to delay 11 further strategic site allocations until a safe route for access and egress can be provided - 8 in Staines and 3 in Shepperton • the imposition of a constraint to some strategic site allocations restricting development to the built footprint • a completely revised policy E3 on managing flood risk and significantly updated evidence base for flooding <p>However, a couple of sticking points remain, principally on groundwater flood risk, and I hope that the detailed comments below might prove useful.</p>	
<p>Attachments</p>	
Attachment Name:	
Attachment Name:	
<p>Link to comment:</p> <p>https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021301&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15921748%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1</p>	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM32	
Respondent: CARLO CARUSO (41938753)	
Organisation:	
Response ID: 13008789 (CO/1)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
This modification should be reverted back please.	
Question 4: Please use this text box to provide any other comments.	
It need to be more future proof and not use of "should" wording.	
Attachments	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13008789&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15921876%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM32	
Respondent: Surinder Bains (48030817)	
Organisation:	
Response ID: 13016501 (CO/8)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>Dear Sir/Madam,</p> <p>WE have received your SLP-MM plan proposed modifications.</p> <p>After long searching the planned areas, we have found that so many green belt areas have been considered but our 3 acres land in Croysdale ave TW16 6QN has not been in your list for development plans. Whereas next door to us ref. no HS1/002 in your proposed plan have been considered.</p> <p>Therefore it is requested that our land can be considered in your plans.</p> <p>Many thanks & Regards</p>	
Question 4: Please use this text box to provide any other comments.	
No response	
Attachments	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13016501&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15921876%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM32	
Respondent: Flora Macleod [Savills] (41643681)	
Organisation: Wates Developments	
Response ID: 13020725 (CO/94)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
We consider that sites that already have the benefit of planning permission in the Green Belt should be removed from the Green Belt. This is explained in Sections (A) – © below	
Question 4: Please use this text box to provide any other comments.	
In response to the main modifications to the Local Plan, please see attached our representations of Wates Developments.	
Attachments	
Attachment Name: SBC - Wates Main Mods Reps-submission.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198561/PDF/-/SBC%20-%20Wates%20Main%20Mods%20Reps-%20submission.pdf
Attachment Name: Appendix 1- draft site allocation policy.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198562/PDF/-/Appendix%201-%20draft%20site%20allocation%20policy.pdf
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020725&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15921876%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM32	
Respondent: Simon Cripps (33561057)	
Organisation:	
Response ID: 13024277 (CO/174)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>1. Loss of Green Belt Land</p> <p>The proposed release of Green Belt sites for housing development is highly concerning. These areas provide vital green space for wellbeing, biodiversity, and flood resilience. I appreciate that national housing targets must be met, but it seems that Green Belt land is being sacrificed before all possible brownfield options have been fully exhausted. I question whether sufficient emphasis has been placed on urban regeneration or reusing underutilised land within existing settlements.</p>	
Question 4: Please use this text box to provide any other comments.	
No response	
Attachments	
Attachment Name: Spelthorne Borough Council Local Plan Main Modifications Consultation.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1207888/PDF/-/Spelthorne%20Borough%20Council%20Local%20Plan%20Main%20Modifications%20Consultation.pdf
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13024277&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D%26repIDstyle%3Dstarts%26repStatus%3DP%252CM%252CR%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DmodifyDate%26dir%3Ddesc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM32	
Respondent: Ciaran Gunning [CBRE] (59327201)	
Organisation: Tarmac Trading Ltd	
Response ID: 13023989 (CO/165)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>Whilst appreciating that the Spelthorne Local Plan is being considered under the NPPF (December 2023), as proposed, MM32 risk being out of date as soon as it is adopted. Given the changes introduced by the NPPF (December 2024) we suggest that it would be more effective for the wording to say that it should not be approved except for in very special circumstances or other exemptions as set out in National Planning Policy.</p> <p>This change should be added for consistency.</p>	
Question 4: Please use this text box to provide any other comments.	
No response	
Attachments	
Attachment Name: Spelthorne Main Modifications Consultation Response - CBRE Ltd OBO Tarmac Trading Ltd.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1207832/PDF/-/Spelthorne
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment:	
https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13023989&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D%26repIDstyle%3Dstarts%26repStatus%3DP%252CM%252CR%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DmodifyDate%26dir%3Ddesc%26startRow%3D11	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM33	
Respondent: Flora Macleod [Savills] (41643681)	
Organisation: Wates Developments	
Response ID: 13020757 (CO/95)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
We consider that sites that already have the benefit of planning permission in the Green Belt should be removed from the Green Belt. This is explained in Sections (A) – © below	
Question 4: Please use this text box to provide any other comments.	
In response to the main modifications to the Local Plan, please see attached our representations of Wates Developments.	
Attachments	
Attachment Name: SBC - Wates Main Mods Reps-submission.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198563/PDF/-/SBC%20-%20Wates%20Main%20Mods%20Reps-%20submission.pdf
Attachment Name: Appendix 1- draft site allocation policy.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198564/PDF/-/Appendix%201-%20draft%20site%20allocation%20policy.pdf
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020757&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15921876%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM33	
Respondent: Judith Montford (19771841)	
Organisation: Environment Agency	
Response ID: 13022005 (CO/134)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Thank you for consulting the Environment Agency on the Spelthorne Local Plan - Main Modifications document.</p> <p>We have reviewed the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025 and Appendix C: Proposed Main Modification MM81: Policy E3: Managing Flood Risk and in summary we are happy with the modifications listed below to the local plan.</p> <p>PS – please check the site allocation modification numbers in the Sustainability Appraisal of Modification (Post Examination Addendum – Main Modifications April 2025). They do not all appear to tally with the numbers of the main modifications for the allocations in the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025.</p> <p>We thank you for these modifications that are proposed to be made to the plan.</p>	
Attachments	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022005&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15921876%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM34	
Respondent: Stewart Pomeroy [Colne Valley Park Community Interest Co] (19545217)	
Organisation: Colne Valley Park Community Interest Company	
Response ID: 13019285 (CO/49)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>Policy SP5:</p> <p>At the hearing on Policy SP5 (CVRP) agreement was reached on adjustments to the Policy and we support MMs 34, 35 and 36 to Policy SP5 which makes this policy more sound.</p>	
Question 4: Please use this text box to provide any other comments.	
Please see the attached response to the above named consultation. Submitted for and on behalf of the Colne Valley Regional Park.	
Attachments	
Attachment Name: Spelthorne LP Major Modifications CVRP May 25.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197763/PDF/-/Spelthorne
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019285&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15922100%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM35	
Respondent: Stewart Pomeroy [Colne Valley Park Community Interest Co] (19545217)	
Organisation: Colne Valley Park Community Interest Company	
Response ID: 13019317 (CO/50)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
Policy SP5: At the hearing on Policy SP5 (CVRP) agreement was reached on adjustments to the Policy and we support MMs 34, 35 and 36 to Policy SP5 which makes this policy more sound.	
Question 4: Please use this text box to provide any other comments.	
Please see the attached response to the above named consultation. Submitted for and on behalf of the Colne Valley Regional Park.	
Attachments	
Attachment Name: Spelthorne LP Major Modifications CVRP May 25.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197767/PDF/-/Spelthorne
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019317&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15922100%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM36	
Respondent: Stewart Pomeroy [Colne Valley Park Community Interest Co] (19545217)	
Organisation: Colne Valley Park Community Interest Company	
Response ID: 13019349 (CO/51)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>Policy SP5:</p> <p>At the hearing on Policy SP5 (CVRP) agreement was reached on adjustments to the Policy and we support MMs 34, 35 and 36 to Policy SP5 which makes this policy more sound.</p>	
Question 4: Please use this text box to provide any other comments.	
Please see the attached response to the above named consultation. Submitted for and on behalf of the Colne Valley Regional Park.	
Attachments	
Attachment Name: Spelthorne LP Major Modifications CVRP May 25.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197768/PDF/-/Spelthorne
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019349&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15922100%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM37	
Respondent: Judith Montford (19771841)	
Organisation: Environment Agency	
Response ID: 13022037 (CO/135)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Thank you for consulting the Environment Agency on the Spelthorne Local Plan - Main Modifications document.</p> <p>We have reviewed the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025 and Appendix C: Proposed Main Modification MM81: Policy E3: Managing Flood Risk and in summary we are happy with the modifications listed below to the local plan.</p> <p>PS – please check the site allocation modification numbers in the Sustainability Appraisal of Modification (Post Examination Addendum – Main Modifications April 2025). They do not all appear to tally with the numbers of the main modifications for the allocations in the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025.</p> <p>We thank you for these modifications that are proposed to be made to the plan.</p>	
Attachments	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022037&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15922420%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM38	
Respondent: Judith Montford (19771841)	
Organisation: Environment Agency	
Response ID: 13022069 (CO/136)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Thank you for consulting the Environment Agency on the Spelthorne Local Plan - Main Modifications document.</p> <p>We have reviewed the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025 and Appendix C: Proposed Main Modification MM81: Policy E3: Managing Flood Risk and in summary we are happy with the modifications listed below to the local plan.</p> <p>PS – please check the site allocation modification numbers in the Sustainability Appraisal of Modification (Post Examination Addendum – Main Modifications April 2025). They do not all appear to tally with the numbers of the main modifications for the allocations in the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025.</p> <p>We thank you for these modifications that are proposed to be made to the plan.</p>	
Attachments	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022069&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15922420%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM39	
Respondent: Judith Montford (19771841)	
Organisation: Environment Agency	
Response ID: 13022101 (CO/137)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Thank you for consulting the Environment Agency on the Spelthorne Local Plan - Main Modifications document.</p> <p>We have reviewed the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025 and Appendix C: Proposed Main Modification MM81: Policy E3: Managing Flood Risk and in summary we are happy with the modifications listed below to the local plan.</p> <p>PS – please check the site allocation modification numbers in the Sustainability Appraisal of Modification (Post Examination Addendum – Main Modifications April 2025). They do not all appear to tally with the numbers of the main modifications for the allocations in the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025.</p> <p>We thank you for these modifications that are proposed to be made to the plan.</p>	
Attachments	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022101&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15922420%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM43	
Respondent: Stewart Pomeroy [Colne Valley Park Community Interest Co] (19545217)	
Organisation: Colne Valley Park Community Interest Company	
Response ID: 13019381 (CO/52)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
Policy SP7: We support MM 43 which makes this policy clearer, more sound and more effective.	
Question 4: Please use this text box to provide any other comments.	
Please see the attached response to the above named consultation. Submitted for and on behalf of the Colne Valley Regional Park.	
Attachments	
Attachment Name: Spelthorne LP Major Modifications CVRP May 25.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197769/PDF/-/Spelthorne
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019381&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15923028%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM44	
Respondent: CARLO CARUSO (41938753)	
Organisation:	
Response ID: 13008821 (CO/2)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
10% should be justified based on data points. Why for example can't be 13% or 18% or 2%. Unless there is an explanation on the wording itself I would recommend the value to be doubled.	
Attachments	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13008821&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15923028%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM46	
Respondent: Flora Macleod [Savills] (41643681)	
Organisation: Wates Developments	
Response ID: 13020789 (CO/96)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
SBC is already very marginal on its housing delivery, and we consider that greater certainty could be achieved through an increased number of housing allocations or a change to the Green Belt boundary in this location, which would directly facilitate the Reserved Matters of the permission. See sections (A) – (C) below	
Question 4: Please use this text box to provide any other comments.	
In response to the main modifications to the Local Plan, please see attached our representations of Wates Developments.	
Attachments	
Attachment Name: SBC - Wates Main Mods Reps-submission.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198565/PDF/-/SBC
Attachment Name: Appendix 1- draft site allocation policy.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198566/PDF/-/Appendix
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020789&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15923348%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM47	
Respondent: Craig Hatton [Network Rail] (59464353)	
Organisation: Network Rail	
Response ID: 13018997 (CO/40)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
Policy H1: Homes for All (MM47 and MM54) NR supports the updating of the annual housing requirement for Spelthorne to reflect the most-up-to-date need.	
Question 4: Please use this text box to provide any other comments.	
Please see attached NR representations to the consultation, ending 15 May 2025.	
Attachments	
Attachment Name: Network Rail response to Spelthorne Local Plan Main Modifications April 2025 (1).pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197629/PDF/-/Network Rail response to Spelthorne Local Plan Main Modifications April 2025 1.pdf
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13018997&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15923348%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM47	
Respondent: Flora Macleod [Savills] (41643681)	
Organisation: Wates Developments	
Response ID: 13020821 (CO/97)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
SBC is already very marginal on its housing delivery, and we consider that greater certainty could be achieved through an increased number of housing allocations or a change to the Green Belt boundary in this location, which would directly facilitate the Reserved Matters of the permission. See sections (A) – (C) below	
Question 4: Please use this text box to provide any other comments.	
In response to the main modifications to the Local Plan, please see attached our representations of Wates Developments.	
Attachments	
Attachment Name: SBC - Wates Main Mods Reps-submission.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198567/PDF/-/SBC
Attachment Name: Appendix 1- draft site allocation policy.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198568/PDF/-/Appendix
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020821&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15923348%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM48
Respondent: Steve Curley [DP9] (59484321)
Organisation: Elysian Residences
Response ID: 13020917 (CO/100)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>Draft Main Modifications 48, 55 & 61 – Draft new Paragraph 6.16 and Draft Policies H1 & H2</p> <p>Elysian Residences support the Main Modifications proposed in relation to build to rent accommodation. Similarly to IRC, build to rent accommodation is associated with additional costs for providers, however, the Main Modifications in this instance offer a reduced requirement for affordable housing provision in line with national planning policy, to ensure the viability of these projects within the borough.</p> <p>Elysian Residences supports the provision of affordable private rent within build to rent schemes but note that this could be amended within a subsequent planning SPD. Additionally, the draft Main Modifications set out a requirement for 20% provision of affordable housing for build to rent schemes which is in accordance with national planning policy. Elysian Residences would encourage SBC to retain a reduced percentage of affordable housing provision for build to rent schemes in the event the council later set an alternative benchmark figure.</p> <p>Additional clarity is required in relation to the requirement for affordable housing for build to rent on greenfield sites. The draft wording of policy H2(e) is set out below: “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>The draft wording suggests that 20% affordable housing provision will be applied to all built to rent schemes within the borough. In lieu of any reference to an amended affordable housing provision for build to rent schemes that are developed on greenfield sites, Elysian Residences propose that the same 20% benchmark is applied to these schemes, rather than a blanket 50% affordable housing requirement for all development (set out under the Pre-Submission Local Plan, draft Policy H2), which would create significant viability issues for mixed tenure build to rent sites in these locations. The suggested approach would maintain consistency with national policy and would be positively prepared against SBC objectively assessed needs.</p>
Question 4: Please use this text box to provide any other comments.
On behalf of Elysian Residences, please find attached written representations on the Main Modifications to the Pre-Submission Local Plan as part of the live public consultation.
Attachments

Representations Received in Response to Main Modifications Consultation (in MM number order)

Attachment Name: Spelthorne Main Mods Reps 15052025.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198750/PDF/-/Spelthorne Main Mods Reps 15052025.pdf
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020917&row=1&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15923348%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM52
Respondent: Steve Curley [DP9] (59484321)
Organisation: Elysian Residences
Response ID: 13020853 (CO/98)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>Draft Main Modifications 52 & 62 – Draft Policies H1 & H2</p> <p>Draft Policy H1 addresses the requirements relating to proposals for the provision of homes for all within SBC, with the inclusion of Main Modification 52, which removes reference to Class C3 dwellings and instead references “a relevant use class”. The relevant use classes are later defined under Draft Policy H2(g) within Main Modification 62 as residential development falling under Classes C2, C3 and C4.</p> <p>Whilst Elysian Residences are supportive of the further clarity provided within the Main Modifications document from the Pre-Submission Local Plan (2022), it should be recognised that the provision of on-site affordable housing as part of an extra care accommodation scheme is incredibly challenging due to the long-term operational costs that fall to the developer.</p> <p>The proposed requirement for all Class C2 schemes to meet the minimum 30% affordable housing provision proposed under the emerging Local Plan or the 50% provision for greenfield sites would have significant financial and viability impacts for Integrated Retirement Community (‘IRC’) proposals and have the unintended consequence of limiting the delivery of much needed homes for older people. Housing for older people should be considered on their own merits having regard to the viability of the scheme, thus enabling a viability assessment to be submitted and considered. This approach is necessary as the scheme economics for Integrated Retirement Communities is different to standard C3 market housing. They provide substantial shared spaces such as care office, activities room, restaurant, library, gym etc. which is necessary to provide health and wellbeing benefits to its occupiers. As already noted above, this provides wider benefits to society such as a reduction in the burden of the NHS but also means viability is different to standard C3 market housing.</p> <p>It is the position of Elysian Residences that this draft policy wording does not acknowledge the additional costs associated with providing IRC accommodation as well as the significant benefit of this type of accommodation to elderly communities (which are expected to grow, within the borough, over the plan period).</p> <p>As such, Elysian Residences do not consider these Main Modifications to be positively prepared against identified “major local issues” as defined in the Pre-Submission Local Plan, which includes the recognised need for housing for the elderly. The objectively assessed need for housing is set out within the SHMA 2015 report (as referenced under draft Policy ST2) which identifies a growth in need for specialist accommodation within the borough. Therefore, Elysian Residences would request that</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

the council consider an affordable housing provision for Class C2 which is reflective of the additional financial implications on extra care providers, as is the case under the policy for build to rent schemes, as identified below.	
Question 4: Please use this text box to provide any other comments.	
On behalf of Elysian Residences, please find attached written representations on the Main Modifications to the Pre-Submission Local Plan as part of the live public consultation.	
Attachments	
Attachment Name: Spelthorne Main Mods Reps 15052025.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198741/PDF/-/Spelthorne Main Mods Reps 15052025.pdf
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020853&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15923348%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM54	
Respondent: Craig Hatton [Network Rail] (59464353)	
Organisation: Network Rail	
Response ID: 13019029 (CO/41)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
Policy H1: Homes for All (MM47 and MM54) NR supports the updating of the annual housing requirement for Spelthorne to reflect the most-up-to-date need.	
Question 4: Please use this text box to provide any other comments.	
Please see attached NR representations to the consultation, ending 15 May 2025.	
Attachments	
Attachment Name: Network Rail response to Spelthorne Local Plan Main Modifications April 2025 (1).pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197631/PDF/-/Network
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019029&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15923348%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM55
Respondent: Steve Curley [DP9] (59484321)
Organisation: Elysian Residences
Response ID: 13020949 (CO/101)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>Draft Main Modifications 48, 55 & 61 – Draft new Paragraph 6.16 and Draft Policies H1 & H2</p> <p>Elysian Residences support the Main Modifications proposed in relation to build to rent accommodation. Similarly to IRC, build to rent accommodation is associated with additional costs for providers, however, the Main Modifications in this instance offer a reduced requirement for affordable housing provision in line with national planning policy, to ensure the viability of these projects within the borough.</p> <p>Elysian Residences supports the provision of affordable private rent within build to rent schemes but note that this could be amended within a subsequent planning SPD. Additionally, the draft Main Modifications set out a requirement for 20% provision of affordable housing for build to rent schemes which is in accordance with national planning policy. Elysian Residences would encourage SBC to retain a reduced percentage of affordable housing provision for build to rent schemes in the event the council later set an alternative benchmark figure.</p> <p>Additional clarity is required in relation to the requirement for affordable housing for build to rent on greenfield sites. The draft wording of policy H2(e) is set out below: “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>The draft wording suggests that 20% affordable housing provision will be applied to all built to rent schemes within the borough. In lieu of any reference to an amended affordable housing provision for build to rent schemes that are developed on greenfield sites, Elysian Residences propose that the same 20% benchmark is applied to these schemes, rather than a blanket 50% affordable housing requirement for all development (set out under the Pre-Submission Local Plan, draft Policy H2), which would create significant viability issues for mixed tenure build to rent sites in these locations. The suggested approach would maintain consistency with national policy and would be positively prepared against SBC objectively assessed needs.</p>
Question 4: Please use this text box to provide any other comments.
On behalf of Elysian Residences, please find attached written representations on the Main Modifications to the Pre-Submission Local Plan as part of the live public consultation.
Attachments

Representations Received in Response to Main Modifications Consultation (in MM number order)

Attachment Name: Spelthorne Main Mods Reps 15052025.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198752/PDF/-/Spelthorne Main Mods Reps 15052025.pdf
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020949&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15923348%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM58	
Respondent: CARLO CARUSO (41938753)	
Organisation:	
Response ID: 13008853 (CO/3)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
This number could have been valid in the past - as of today and recent changes post Brexit and legislations modification this is not fair anymore and the number of benefits being cut and reduced meaning the amount of affordable homes need to decrease accordingly instead of 30%	
Question 4: Please use this text box to provide any other comments.	
I would kindly request to consider a value that is in line with changes the government has been putting in place in the last few years and move this target down to 18%.	
Attachments	
Attachment Name:	
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment:	
https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13008853&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15924532%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM59	
Respondent: CARLO CARUSO (41938753)	
Organisation:	
Response ID: 13008917 (CO/5)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
Yes	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
There is a clear impact on the private housing market - percentages should be reconsidered if we want the area to move toward a growth direction instead of affecting private freeholder housing.	
Attachments	
Attachment Name:	
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment:	
https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13008917&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15924532%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM59	
Respondent: Grace Cox (58961025)	
Organisation:	
Response ID: 13009141 (CO/7)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
Yes	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
Paragraph 2(d) of policy H2 makes reference to First Homes however this requirement has now been removed from the updated NPPF. As such this element of the policy is no longer justified .This and all references to First Homes within the supporting text should be removed from the policy.	
Question 4: Please use this text box to provide any other comments.	
No response	
Attachments	
Attachment Name:	
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment:	
https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13009141&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15924532%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM61
Respondent: Steve Curley [DP9] (59484321)
Organisation: Elysian Residences
Response ID: 13020981 (CO/102)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>Draft Main Modifications 48, 55 & 61 – Draft new Paragraph 6.16 and Draft Policies H1 & H2</p> <p>Elysian Residences support the Main Modifications proposed in relation to build to rent accommodation. Similarly to IRC, build to rent accommodation is associated with additional costs for providers, however, the Main Modifications in this instance offer a reduced requirement for affordable housing provision in line with national planning policy, to ensure the viability of these projects within the borough.</p> <p>Elysian Residences supports the provision of affordable private rent within build to rent schemes but note that this could be amended within a subsequent planning SPD. Additionally, the draft Main Modifications set out a requirement for 20% provision of affordable housing for build to rent schemes which is in accordance with national planning policy. Elysian Residences would encourage SBC to retain a reduced percentage of affordable housing provision for build to rent schemes in the event the council later set an alternative benchmark figure.</p> <p>Additional clarity is required in relation to the requirement for affordable housing for build to rent on greenfield sites. The draft wording of policy H2(e) is set out below: “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>The draft wording suggests that 20% affordable housing provision will be applied to all built to rent schemes within the borough. In lieu of any reference to an amended affordable housing provision for build to rent schemes that are developed on greenfield sites, Elysian Residences propose that the same 20% benchmark is applied to these schemes, rather than a blanket 50% affordable housing requirement for all development (set out under the Pre-Submission Local Plan, draft Policy H2), which would create significant viability issues for mixed tenure build to rent sites in these locations. The suggested approach would maintain consistency with national policy and would be positively prepared against SBC objectively assessed needs.</p>
Question 4: Please use this text box to provide any other comments.
On behalf of Elysian Residences, please find attached written representations on the Main Modifications to the Pre-Submission Local Plan as part of the live public consultation.
Attachments

Representations Received in Response to Main Modifications Consultation (in MM number order)

Attachment Name: Spelthorne Main Mods Reps 15052025.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198754/PDF/-/Spelthorne Main Mods Reps 15052025.pdf
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020981&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15924532%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM62
Respondent: Steve Curley [DP9] (59484321)
Organisation: Elysian Residences
Response ID: 13020885 (CO/99)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>Draft Main Modifications 52 & 62 – Draft Policies H1 & H2</p> <p>Draft Policy H1 addresses the requirements relating to proposals for the provision of homes for all within SBC, with the inclusion of Main Modification 52, which removes reference to Class C3 dwellings and instead references “a relevant use class”. The relevant use classes are later defined under Draft Policy H2(g) within Main Modification 62 as residential development falling under Classes C2, C3 and C4.</p> <p>Whilst Elysian Residences are supportive of the further clarity provided within the Main Modifications document from the Pre-Submission Local Plan (2022), it should be recognised that the provision of on-site affordable housing as part of an extra care accommodation scheme is incredibly challenging due to the long-term operational costs that fall to the developer.</p> <p>The proposed requirement for all Class C2 schemes to meet the minimum 30% affordable housing provision proposed under the emerging Local Plan or the 50% provision for greenfield sites would have significant financial and viability impacts for Integrated Retirement Community (‘IRC’) proposals and have the unintended consequence of limiting the delivery of much needed homes for older people. Housing for older people should be considered on their own merits having regard to the viability of the scheme, thus enabling a viability assessment to be submitted and considered. This approach is necessary as the scheme economics for Integrated Retirement Communities is different to standard C3 market housing. They provide substantial shared spaces such as care office, activities room, restaurant, library, gym etc. which is necessary to provide health and wellbeing benefits to its occupiers. As already noted above, this provides wider benefits to society such as a reduction in the burden of the NHS but also means viability is different to standard C3 market housing.</p> <p>It is the position of Elysian Residences that this draft policy wording does not acknowledge the additional costs associated with providing IRC accommodation as well as the significant benefit of this type of accommodation to elderly communities (which are expected to grow, within the borough, over the plan period).</p> <p>As such, Elysian Residences do not consider these Main Modifications to be positively prepared against identified “major local issues” as defined in the Pre-Submission Local Plan, which includes the recognised need for housing for the elderly. The objectively assessed need for housing is set out within the SHMA 2015 report (as referenced under draft Policy ST2) which identifies a growth in need for specialist accommodation within the borough. Therefore, Elysian Residences would request that</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

the council consider an affordable housing provision for Class C2 which is reflective of the additional financial implications on extra care providers, as is the case under the policy for build to rent schemes, as identified below.	
Question 4: Please use this text box to provide any other comments.	
On behalf of Elysian Residences, please find attached written representations on the Main Modifications to the Pre-Submission Local Plan as part of the live public consultation.	
Attachments	
Attachment Name: Spelthorne Main Mods Reps 15052025.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198743/PDF/-/Spelthorne Main Mods Reps 15052025.pdf
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020885&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15924532%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM64	
Respondent: Judith Montford (19771841)	
Organisation: Environment Agency	
Response ID: 13022133 (CO/138)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Thank you for consulting the Environment Agency on the Spelthorne Local Plan - Main Modifications document.</p> <p>We have reviewed the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025 and Appendix C: Proposed Main Modification MM81: Policy E3: Managing Flood Risk and in summary we are happy with the modifications listed below to the local plan.</p> <p>PS – please check the site allocation modification numbers in the Sustainability Appraisal of Modification (Post Examination Addendum – Main Modifications April 2025). They do not all appear to tally with the numbers of the main modifications for the allocations in the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025.</p> <p>We thank you for these modifications that are proposed to be made to the plan.</p>	
Attachments	
Attachment Name:	
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022133&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15925140%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3D%26%26sort%3DsubmitDate%26dir%3Ddesc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM77	
Respondent: Judith Montford (19771841)	
Organisation: Environment Agency	
Response ID: 13022165 (CO/139)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Thank you for consulting the Environment Agency on the Spelthorne Local Plan - Main Modifications document.</p> <p>We have reviewed the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025 and Appendix C: Proposed Main Modification MM81: Policy E3: Managing Flood Risk and in summary we are happy with the modifications listed below to the local plan.</p> <p>PS – please check the site allocation modification numbers in the Sustainability Appraisal of Modification (Post Examination Addendum – Main Modifications April 2025). They do not all appear to tally with the numbers of the main modifications for the allocations in the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025.</p> <p>We thank you for these modifications that are proposed to be made to the plan.</p>	
Attachments	
Attachment Name:	
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022165&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15925972%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3D%26%26sort%3DsubmitDate%26dir%3Ddesc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM79	
Respondent: Mrs Kath Sanders (19813377)	
Organisation:	
Response ID: 13021333 (CO/113)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>7. ENVIRONMENT</p> <p>MM79 - Amend paragraph 7.25</p> <p>Other: Typo - it should read "three" rather than "two". Where it states that there are two significant areas identified in Spelthorne, it goes on to list three Biodiversity Opportunity Areas.</p> <p>Recommendation: Amend "two" to "three".</p> <p>Dear Sir,</p> <p>Many of the Main Modifications are welcome and justify the work that the Council, the Environment Agency and yourself have put in over two years in trying to make the Plan sound. The changes go a long way to explain "the horns of the dilemma" upon which you found yourself.</p> <p>The following Main Modifications are particularly welcome:</p> <ul style="list-style-type: none"> • the removal of 5 strategic site allocations due to flood risk • the imposition of a requirement to delay 11 further strategic site allocations until a safe route for access and egress can be provided - 8 in Staines and 3 in Shepperton • the imposition of a constraint to some strategic site allocations restricting development to the built footprint • a completely revised policy E3 on managing flood risk and significantly updated evidence base for flooding <p>However, a couple of sticking points remain, principally on groundwater flood risk, and I hope that the detailed comments below might prove useful.</p>	
Attachments	
Attachment Name:	
Attachment Name:	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021333&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15925972%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3D%26%26sort%3DsubmitDate%26dir%3Ddesc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM81	
Respondent: mr Ian Beardsmore (41415905)	
Organisation:	
Response ID: 13018005 (CO/17)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
MM81 'Flooding' An observation. Perhaps unwittingly does 7c preclude the provision of undercrofts that can be used normally for parking but also as flood storage.	
Question 4: Please use this text box to provide any other comments.	
Enjoy !	
Attachments	
Attachment Name: LP IB 03 MM81 Flooding.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197181/PDF/-/LP IB 03 MM81 Flooding.pdf
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13018005&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15926868%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM81	
Respondent: Patricia Maclagan (59377953)	
Organisation:	
Response ID: 13018101 (CO/20)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
I am very concerned about the local plan and the flooding risk . Very tall buildings are not a good idea as the experts confirm.Also the ambiance of the riverside is at risk as is the sensitive and the historical area.	
Attachments	
Attachment Name:	
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment:	
https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13018101&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15926868%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM81
Respondent: Mr Nigel Rowe (33516193)
Organisation: Riverside Residents (Staines) Coalition
Response ID: 13018613 (CO/28)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>2 Flood risk</p> <p>2.1 Three sources of flood risk impact on Staines: From the river (fluvial), surface water run-off (pluvial), and groundwater. A good deal of solid data is available on flood risk from the river, for which the Environment Agency is the statutory consultee. The same is broadly true for surface water run-off, for which Surrey County Council is the statutory consultee. Until very recently, incredibly little was known about flood risk from groundwater in Staines (and elsewhere in the borough), perhaps not least because there is, remarkably, no statutory consultee in the planning system with responsibility to monitor and advise on this source.</p> <p>2.2 Groundwater flood risk is particularly acute in Staines because the town is built on a thin layer of gravel, varying in thickness from 1 to 5 metres, sitting on impermeable London clay. The gravel is particularly clean (ie lacking in clay) in the Staines area, facilitating more rapid transit of water through it and thus exacerbating the problem. Putting to one side whether it is necessary or sensible to build tower blocks of flats on sites that will flood, particular community concerns relate to the consequences of such developments. These include both their potential to increase flood risk for others in the area and the cost, even availability, of property insurance.</p> <p>2.3 Research last year by Royal Holloway, University of London, determined that groundwater was a source of flood risk in Staines at least equal to that from the river and surface water run-off (with the latter in fact adding to the problem with groundwater). When initial results of the research were first outlined in May 2024, Spelthorne Borough Council chose publicly to discount its findings because they had not been peer reviewed. Perhaps an added motivation for taking this position was the realisation that, if validated, the research would bring into serious question the Council's development plans for Staines.</p> <p>2.4 The research, with its findings unaltered, achieved independent scientific peer review validation in March 2025 (after completion of the Inspector's public examination of the Plan) in the prestigious Journal of Flood Risk Management. The full report is attached (click here).</p> <p>2.5 In summary: The research shows how powerful, wildly variable and critically important groundwater flows are through the thin gravel substrate on which</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Staines is built; how they act independently of, but add materially to, flood-risk from the river and surface water run-off; how and where they produce discrete zones of significantly heightened flood risk. Barriers in the gravel substrate from the foundations and basements of existing buildings have significantly increased flood risks in Staines. New barriers, however shallow or deep, from new developments will add to the problem ... and the problem will therefore be further exacerbated a) the more there are of these new barriers both individually and as disturbed water-flows from them interact with each other, and b) from climate change.

2.6 As noted earlier, 5 sites for major developments have been removed from the Plan because of flood risk, and the Council originally said others had been delayed to later in the Plan period to take advantage of the proposed River Thames Scheme. However, and putting aside the questions now being raised publicly about whether the Scheme will go ahead within the timeline of the Local Plan, the Royal Holloway research also shows that this Scheme will have no material impact on the significant flood risk from groundwater.

2.7 The 5 sites of the original 19 proposed for development in Staines were completely withdrawn because the Environment Agency had identified them as being suitable only for water compatible development (as defined in the National Planning Policy Framework). It is now clear from the Royal Holloway research that, in addition to these sites, others are equally vulnerable to flood risk because of what is now known about groundwater impact and should be reconsidered in the proposed 'immediate review' of the Plan. The need for this also became very evident to those attending the presentation of the research by its lead author Dr Jonathan Paul at a public meeting on 6 May ([click here for presentation slides](#)). One of the community's concerns about the Plan's implementation in Staines is the Council's apparently ambiguous and casual attitude to flood risk. For example, the Council removed the massive riverside Bridge Street car park site (ST4/002) from the Plan explicitly "for residential and hotel purposes" (at the Environment Agency's insistence because of flood risk). Within days of seeking the Planning Inspector's approval to withdraw the site from the Plan, the Council signed a 250-year lease agreement with a developer for a large hotel (which would become the biggest building by far in Staines) on the site.

2.8 Recommended imperatives: Given the extreme importance and critically unpredictable impact of flood risk from groundwater in Staines, and the demonstrated potential for the foundations of new developments (however shallow or deep) to increase flood risk in the area around them:

- * Major developments proposed for Staines in years 1 – 5 of the Plan should be subject to reconsideration as part of the agreed 'immediate review' of the Plan.
- * Also as part of the 'immediate review', consideration should be given to strengthening and clarifying policies to ensure there is no risk of flooding from new developments to others in the area (not just that the risk should be mitigated).
- * Any and all proposed new developments in Staines must (not should as in the proposed revision to the Level 1 SFRA referred to in policy E3 on managing flood risk) be subject to
 - a) an independent hydrogeological risk assessment and
 - b) a contractual undertaking by the developer that they accept full legal responsibility for any increased flood risk created for others in the area.

Question 4: Please use this text box to provide any other comments.

Representations Received in Response to Main Modifications Consultation (in MM number order)

I attach herewith our response to the Council's consultation for your consideration.	
Attachments	
Attachment Name: LOCAL PLAN- RRSC PUBLIC CONSULTATION SUBMISSION 7 MAY pdf.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197314/PDF/-/LOCAL
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13018613&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15926868%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM81	
Respondent: Mrs Nikki Nicholson [Surrey County Council] (49092289)	
Organisation: Surrey County Council	
Response ID: 13019829 (CO/66)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Policy E3: Managing Flood Risk</p> <p>1) Remove: ' elsewhere) appears to be a 'typo'</p> <p>Key Evidence:</p> <p>Flood Risk Management Strategy link should be updated: Surrey Local Flood Risk Management Strategy - Surrey County Council current link takes to a page not found</p> <p>The final 2 links can be replaced with one: Sustainable Drainage Systems (SuDS) planning advice - Surrey County Council</p> <p>The other modifications are as previously discussed and agreed.</p> <p>Please find attached the SCC response to the above consultation,</p>	
Attachments	
Attachment Name:	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198316/PDF/-/SCC_Response_Spelthorne_Main_Modifications_Consultation_May_2025.pdf
Link to comment:	https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019829&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15926868%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM81
Respondent: Mr Gary Clements (59412737)
Organisation:
Response ID: 13020053 (CO/73)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
No response
Question 4: Please use this text box to provide any other comments.
<p>I, and my wife, have been residents of Spelthorne since the 1960s in my case, and the 1940s for my wife.</p> <p>We still live in this borough, and cannot believe what you wish to do to this borough with your Local Plan.</p> <p>You have not considered the feelings of the “quiet majority” of council tax-paying residents who DO NOT want, or need, the excessive increase in residents proposed, or the buildings to house them.</p> <p>You have not fully considered the infrastructure required to deal with the following:</p> <p>1). Drainage; 2). Domestic Waste; 3). Utilities (Electricity, Gas, Water; 4). Health Services; 5). Education Services; 6). Policing; 7). Roads and Highways; 8). Public Transport.</p> <p>With an attitude that any problems will be sorted out in the future, your guidance for the future of Staines looks extremely bleak.</p> <p>With the financial losses that have already been made by Spelthorne Council, (and yet more influence from Central Government), no doubt yet even more council tax will be wasted on this Local Plan.</p> <p>And now, apart from flooding Staines with more people, and more flats, and more cars, perhaps you will flood Staines literally with the latest findings of the local groundwater flooding issues.</p> <p>Perhaps you should all resign and find proper professionals to take your positions.</p>
Attachments
<p>Link to comment:</p> <p>https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020053&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15926868%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM81
Respondent: Mr darren oakley [RPS Consulting] (59328481)
Organisation: Bewley Homes
Response ID: 13020437 (CO/85)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>MM81 - Policy E3 (Managing Flood Risk)</p> <p>Response:</p> <p>The consultation presents a draft policy on ‘managing flood risk’. The wording is set out in Appendix C of the consultation material. We support the inclusion of Policy E3 presented in MM81, in principle. Nonetheless, we raise a number of soundness concerns with some of the detailed draft criteria, set out below.</p> <p>For clarification, the response set out here in regard MM81 has been informed by advice provided by the Hydrology Team at RPS. Whilst there is some overlap, their technical note is appended to this submission to ensure that the Inspector has our full response (Appendix 1).</p> <p>Criteria 1</p> <p>Criteria 1 of the policy implies that a particular site will have to be protected against a 1 in 1000 year event and also compensate for losses in flood plain storage up to a 1 in 1000 year event. As we show in our response to criteria 4, a significant proportion of the borough would likely be already impacted by flooding from a 1 in 1000-year flood event, based on EA flood mapping. This is impractical because this inevitably means the areas that could potentially be used as compensation land are severely limited, and so we question the effectiveness of the criteria in respect to development proposals in the borough. Furthermore, national policy makes clear that all policies should be underpinned by relevant and up-to-date evidence, they should be adequate and proportionate in order to be soundly-based. Criteria 1 is not locally-specific and does not reflect the evidence on flood risk. The criteria is not justified or effective and so is not soundly-based.</p> <p>Criteria 2</p> <p>Criteria 2 makes reference to the sequential test and its application to new development, as well as the exception test. However, the wording is generic in nature and merely repeats elements of national policy (NPPF 2021, para 161 and 167a). Furthermore, the reference to the exception test provides applicants with no additional guidance beyond that set out in the NPPF 2021. The wording does not serve a clear purpose or avoid unnecessary duplication of policies that apply to a particular area and so is unnecessary, contrary to paragraph 16 of the NPPF 2021. The criteria is not soundly-based and so should be deleted.</p> <p>If the criteria is to be retained, we recommend it should be modified to ensure it is practical and helpful to applicants, and thus effective, by adding the following text:</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

“The sequential risk-based approach for development sites within the flood plain in Spelthorne would follow the broad flood principles of associated risk, in accordance with the sequential test. Development in Flood Zone 2 with safe access should be afforded the lowest level of risk, followed by development in Flood Zone 2 with access and egress in Flood Zone 2, then followed but ‘dry island’ development in Flood Zone 3 which would have the highest risk rating

Criteria 3

We have no objection to criteria 3 as drafted.

Criteria 4

Criteria 4 supports development in Flood Zones 2 and 3a and on a dry island provided certain sub-criteria are met. Whilst we support this approach in principle, there are matters of soundness which need to be addressed prior to its adoption in the Plan.

Firstly, the criteria as a whole relates specifically to development in Flood Zone 2 areas and Flood Zone 3a on a ‘dry island’. This is stated in the first sentence.

Nonetheless, Flood Zones 2 and 3a are considered to be separate in terms of their risk profile, where Flood Zone 2 represents a lower risk to development compared to areas in Flood Zone 3a. This is confirmed in the flood zone table at paragraph 13.2 of Appendix C, which differentiates between the four flood zones (1 to 3b) in terms of the ‘probability’ of flooding by zone. We agree.

However, the criteria as drafted does not distinguish between these different zones (FZ2 and 3a); they are essentially treated as if they were the same in the application of the policy. This is unjustified on the available evidence and inconsistent with the ‘risk-based’ approach to the location of development defined in national policy (NPPF 2021, para 161). The criteria as a whole is not soundly-based.

Secondly, criteria 4c requires the preparation of a site-specific flood risk assessment (FRA) which demonstrates that the [new] development, including the access and egress, will be safe for its lifetime (taking into account the appropriate climate change allowance) without increasing flooding elsewhere, and will, where possible, reduce flood risk overall. In respect to ensuring flooding does not increase elsewhere, footnote 5 to the criteria advises where flood storage from any source of flooding is to be lost as a result of development, on-site level-for-level compensatory storage, accounting for the predicted impacts of climate change over the lifetime of the development, should be provided.

Criteria 4c lacks sufficient clarity regarding in which circumstances footnote 5 would be applicable. Specifically, in relation to preventing an increase in flood risk elsewhere, this is only possible if footnote 5 is subject to the condition identified in criteria 4f, as this relates to areas in Flood Zone 3a (1 in 100 event). It is therefore suggested that a clarification is made in paragraph 4c:

“...without increasing flooding elsewhere for events as defined in paragraph 4f...”

In addition, to implement footnote 5 what this means in practise is that to remove flood risk from one site another equivalent site must be made into floodplain. As we have highlighted in our response to criteria 1, a significant proportion of the borough would likely be already impacted by flooding from a 1 in 1000-year (Flood Zone 2) event, based on EA flood mapping. This inevitably means the areas that could potentially be used as compensation storage land in Flood Zone 2 is severely limited. This is impractical. As a result, unless the requirements in footnote 5 are modified to only require compensation for losses in Flood Zone 3 areas, this requirement is not deliverable.

Furthermore, and consistent with our recommended modification to criteria 4c, criteria 4f is not effective as it does not refer to the provision of flood storage compensation, which will be needed to address the loss of storage capacity in areas of Flood Zone 3a.

On this basis, criteria 4f is not effective.

We recommend that the following wording is added to criteria 4f:

“4 (f) applications include appropriate flood warning and evacuation9 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, and flood storage compensation”

In light of these responses, the Land at Charlton Village, Spelthorne represents an appropriate site for residential development, were the Inspector to be minded that more sites are needed to make the Plan sound.

Question 4: Please use this text box to provide any other comments.

Please find attached the responses to the main modifications consultation. Any queries with the details submitted, please let us know by return.

Attachments

Attachment Name: Appendix 1 Spelthorne Policy hydrology comments - MM81 - May 2025.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198520/PDF/-/Appendix 1 Spelthorne Policy hydrology comments - MM81 - May 2025.pdf
Attachment Name: Cover letter - PMM response obo Bewley Homes May 2025.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198521/PDF/-/Cover letter - PMM response obo Bewley Homes May 2025.pdf
Attachment Name: PMMs - Spelthorne Local plan obo Bewley Homes.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198522/PDF/-/PMMs - Spelthorne Local plan obo Bewley Homes.pdf
Attachment Name:	

Link to comment:

<https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020437&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15926868%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM81
Respondent: Mrs Kath Sanders (19813377)
Organisation: 7. ENVIRONMENT MM79 - Amend paragraph 7.25 Other: Typo - it should read “three” rather than “two”. Where it states that there are two significant areas identified in Spelthorne, it goes on to list three Biodiversity Opportunity Areas. Recommendation: A
Response ID: 13021365 (CO/114)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
Yes
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>MM81 - Amend wording to whole Policy E3</p> <p>Rationale: The text is much improved by the changes agreed with the Environment Agency and, as previously stated, are very welcome. However, as indicated in the hearings, I don’t believe the policy is sound in relation to groundwater flood risk. It doesn’t take up the policy recommendation from the Strategic Flood Risk Assessment Level 1 (October 2024), para 5.7, which states that all sites should undergo a preliminary Hydrogeological Risk Assessment (HRA), further identified as a “requirement for groundwater management” in the SFRA Level 2 (October 2024), para 3.3.9, and in the Strategic Sequential and Exception Test (Revision 5), para 3.18 as part of “Part 2: Safe Development without increasing flood risk elsewhere”.</p> <p>In addition, it has been identified over the course of the hearings and subsequently confirmed by FOIs to both MHCLG and DEFRA, that there is no statutory consultee in the planning system with responsibility for groundwater flood risk. Neither SSC as Lead Local Flood Authority, nor the EA representatives who attended the hearings, wanted to assume responsibility for advising on groundwater.</p> <p>Recommendation: Given the latest now peer-reviewed evidence on groundwater flood risk in Staines presented by Dr Paul, and the current lack of a statutory consultee for groundwater flood risk in the planning system, I respectfully ask the Planning Inspector to reconsider including safeguards in the Local Plan which require all sites to undertake a preliminary HRA as advised by the Council’s consultants in the SFRA. For clarity, this should be taken up as a requirement in Policy E3 so that applicants know what is expected of them, and groundwater flood risk given similar consideration as fluvial and pluvial flood risk.</p>
Question 4: Please use this text box to provide any other comments.
<p>Dear Sir,</p> <p>Many of the Main Modifications are welcome and justify the work that the Council, the Environment Agency and yourself have put in over two years in trying to make the Plan sound. The changes go a long way to explain “the horns of the dilemma” upon which you found yourself.</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

<p>The following Main Modifications are particularly welcome:</p> <ul style="list-style-type: none"> the removal of 5 strategic site allocations due to flood risk the imposition of a requirement to delay 11 further strategic site allocations until a safe route for access and egress can be provided - 8 in Staines and 3 in Shepperton the imposition of a constraint to some strategic site allocations restricting development to the built footprint a completely revised policy E3 on managing flood risk and significantly updated evidence base for flooding <p>However, a couple of sticking points remain, principally on groundwater flood risk, and I hope that the detailed comments below might prove useful.</p>	
Attachments	
Attachment Name: IR Response IR2025 04982.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198874/PDF/-/IR Response IR2025 04982.pdf
Attachment Name: IR2025 04256 response DEFRA FOI EIR response - stat consultees flood risk April 2025.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198875/PDF/-/IR2025 04256
Attachment Name: New response to your FOI request - Statutory consultees for flood risk (MHCLG).pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198876/PDF/-/New
Attachment Name: New response to your FOI request - Statutory consultees for flood risk (DEFRA).pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198877/PDF/-/New
<p>Link to comment:</p> <p>https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021365&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15926868%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1</p>	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM81	
Respondent: Judith Montford (19771841)	
Organisation: Environment Agency	
Response ID: 13022197 (CO/140)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Thank you for consulting the Environment Agency on the Spelthorne Local Plan - Main Modifications document.</p> <p>We have reviewed the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025 and Appendix C: Proposed Main Modification MM81: Policy E3: Managing Flood Risk and in summary we are happy with the modifications listed below to the local plan.</p> <p>PS – please check the site allocation modification numbers in the Sustainability Appraisal of Modification (Post Examination Addendum – Main Modifications April 2025). They do not all appear to tally with the numbers of the main modifications for the allocations in the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025.</p> <p>We thank you for these modifications that are proposed to be made to the plan.</p>	
Attachments	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022197&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15926868%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM81	
Respondent: Bernadette Garbutt (19819361)	
Organisation:	
Response ID: 13022901 (CO/162)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Dear Local Plan Team</p> <p>My concerns are about flooding in Staines due to water flows under a Staines are considerable and contribute more to flood risk than the river or surface water run-off. In fact surface water run off seeps into the ground and adds to the problem. Please see research on this matter by Dr Jonathan Paul from Royal Holloway University of London.</p>	
Attachments	
Attachment Name:	
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022901&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15926868%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM81	
Respondent: Simon Cripps (33561057)	
Organisation:	
Response ID: 13024405 (CO/178)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>4. Climate and Flood Risk Concerns</p> <p>Parts of Spelthorne are at serious risk of flooding, and although the Plan includes climate and flood mitigation policies, I am not convinced they go far enough to guarantee the safety of future developments or to align with broader climate action goals.</p>	
Question 4: Please use this text box to provide any other comments.	
No response	
Attachments	
Attachment Name: Spelthorne Borough Council Local Plan Main Modifications Consultation.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1207902/PDF/-/Spelthorne%20Borough%20Council%20Local%20Plan%20Main%20Modifications%20Consultation.pdf
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13024405&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D%26repIDstyle%3Dstarts%26repStatus%3DP%252CM%252CR%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DmodifyDate%26dir%3Ddesc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM82	
Respondent: Judith Montford (19771841)	
Organisation: Environment Agency	
Response ID: 13022229 (CO/141)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Thank you for consulting the Environment Agency on the Spelthorne Local Plan - Main Modifications document.</p> <p>We have reviewed the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025 and Appendix C: Proposed Main Modification MM81: Policy E3: Managing Flood Risk and in summary we are happy with the modifications listed below to the local plan.</p> <p>PS – please check the site allocation modification numbers in the Sustainability Appraisal of Modification (Post Examination Addendum – Main Modifications April 2025). They do not all appear to tally with the numbers of the main modifications for the allocations in the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025.</p> <p>We thank you for these modifications that are proposed to be made to the plan.</p>	
Attachments	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022229&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15926868%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM83	
Respondent: Anne Damerell [Staines Town Society] (19552033)	
Organisation: Staines Town Society	
Response ID: 13017909 (CO/14)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
Yes	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
Yes	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
Staines Town Society supports the flooding section and suggests that the paper by Dr Jonathan Paul of Royal Holloway College Univ of London in the Journal of Flood Risk Management, March 2025, be added to the list of background information. This is a study of ground water flooding in Staines, with particular reference to the floods of 2014 and 2013. It establishes that in places the permeable gravel layer above the impermeable London Clay is unusually thin, so that relatively small rises in the water table will cause ground water flooding, and provides maps of the areas most at risk. This info should be used in assessing flood risk in development sites.	
Question 4: Please use this text box to provide any other comments.	
No response	
Attachments	
Attachment Name:	
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13017909&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15926868%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D11	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM83	
Respondent: Anne Damerell [Staines Town Society] (19552033)	
Organisation: Staines Town Society	
Response ID: 13018197 (CO/21)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
Yes	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
Yes	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
Correction to previous comment: The reference to the Journal of Flood Risk Management is to the June 25 volume: 2025;18:e70050.	
Question 4: Please use this text box to provide any other comments.	
No response	
Attachments	
Attachment Name:	
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13018197&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15926868%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D11	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM83
Respondent: Judith Montford (19771841)
Organisation: Environment Agency
Response ID: 13022261 (CO/142)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
No response
Question 4: Please use this text box to provide any other comments.
<p>Thank you for consulting the Environment Agency on the Spelthorne Local Plan - Main Modifications document.</p> <p>We have reviewed the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025 and Appendix C: Proposed Main Modification MM81: Policy E3: Managing Flood Risk and in summary we are happy with the modifications listed below to the local plan.</p> <p>PS – please check the site allocation modification numbers in the Sustainability Appraisal of Modification (Post Examination Addendum – Main Modifications April 2025). They do not all appear to tally with the numbers of the main modifications for the allocations in the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025.</p> <p>We thank you for these modifications that are proposed to be made to the plan.</p>
Attachments
<p>Link to comment:</p> <p>https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022261&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15926868%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D11</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM84	
Respondent: Judith Montford (19771841)	
Organisation: Environment Agency	
Response ID: 13022293 (CO/143)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Thank you for consulting the Environment Agency on the Spelthorne Local Plan - Main Modifications document.</p> <p>We have reviewed the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025 and Appendix C: Proposed Main Modification MM81: Policy E3: Managing Flood Risk and in summary we are happy with the modifications listed below to the local plan.</p> <p>PS – please check the site allocation modification numbers in the Sustainability Appraisal of Modification (Post Examination Addendum – Main Modifications April 2025). They do not all appear to tally with the numbers of the main modifications for the allocations in the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025.</p> <p>We thank you for these modifications that are proposed to be made to the plan.</p>	
Attachments	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022293&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15926868%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D11	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM85
Respondent: Judith Montford (19771841)
Organisation: Environment Agency
Response ID: 13022325 (CO/144)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
No response
Question 4: Please use this text box to provide any other comments.
<p>Thank you for consulting the Environment Agency on the Spelthorne Local Plan - Main Modifications document.</p> <p>We have reviewed the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025 and Appendix C: Proposed Main Modification MM81: Policy E3: Managing Flood Risk and in summary we are happy with the modifications listed below to the local plan.</p> <p>PS – please check the site allocation modification numbers in the Sustainability Appraisal of Modification (Post Examination Addendum – Main Modifications April 2025). They do not all appear to tally with the numbers of the main modifications for the allocations in the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025.</p> <p>We thank you for these modifications that are proposed to be made to the plan.</p>
Attachments
<p>Link to comment:</p> <p>https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022325&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15926868%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D11</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM87
Respondent: Mr Ian Swinglehurst (25691265)
Organisation:
Response ID: 13016597 (CO/11)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>The research carried out on the risks of flooding associated with Ground Water has now been peer reviewed and published in the “Journal of Flood Risk Management”. See below:</p> <p>https://drive.google.com/file/d/1beHZIJ3Omwf34vjwTJwEbHremc91dUr/view?usp=sharing</p> <p>There is now a widely held view that Spelthorne’s Plan to develop the ‘aquifer’ is now a ‘basket case’ as the effect of submerging large foundations and substructures will have an existential impact on everything around, Egham Hythe and Pooley Green in particular, which falls within Runnymede Borough Council. As such, the impact fails the sequential test and will result in the destruction of existing dwellings in the area.</p> <p>Spelthorne quite stupidly used PWLB loans to purchase this land around 2018, which had they done their homework, was found and considered to be entirely unsuitable for development as a consequence of the events in 2012/13 and then the big flood in 2014.</p> <p>We’ve known for 11 years, that there exists a substantial ground water ‘issue’ which was further highlighted by the permanent changes seen on Staines Moor a SSSI. The installation of the two towers and deep foundations at Elmleigh Road approved by the Planning Inspectorate now coincide with the all year round flooding of Staines Moor. Whilst London Road continues unabated.</p> <p>We have know for 23 years about the impact on the down stream reaches caused by the Jubilee River and the loss of flood plain associated with its construction. In effect, the Jubilee River now floods Datchet, Wraysbury, Egham, Staines and Chertsey, in preference to flooding the RBWM. There are no flood relief channels now proposed to link the outflow of the Jubilee River to the misleading named Runnymede Channel, which is more than 2 miles away from Runnymede. This means that pressure on the Ground Water Flows and the Channel flows between Datchet and Thorpe Park will merely increase, whilst the Staines Local Plan will add an unquantified additional risk to an already known to be undersized and un-maintained system.</p> <p>As I understand it, the decision to ‘invest’ in this land was largely down to one man, who as far as I know also held interests (possibly through marriage) in a Mortgage Brokerage. This needs to be looked at more closely to determine the correctness of my understanding.</p> <p>I would be grateful if you would appraise the Inspector of the published work in “Journal of Flood Risk Management”.</p> <p>Thank you for your help.</p> <p>Yours sincerely,</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Ian Swinglehurst.	
Question 4: Please use this text box to provide any other comments.	
No response	
Attachments	
Attachment Name: FLOOD RISK MANAGEMENT PAUL_RHUL - 2025 - Paul - Groundwater Flooding of Superficial Gravels in an Urbanized Catchment.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1182956/PDF/-/FLOOD
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13016597&row=1&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15927380%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1&done=OBJChangesSaved	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM87
Respondent: Mr Nigel Rowe (33516193)
Organisation: Riverside Residents (Staines) Coalition
Response ID: 13018453 (CO/23)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>2 Flood risk</p> <p>2.1 Three sources of flood risk impact on Staines: From the river (fluvial), surface water run-off (pluvial), and groundwater. A good deal of solid data is available on flood risk from the river, for which the Environment Agency is the statutory consultee. The same is broadly true for surface water run-off, for which Surrey County Council is the statutory consultee. Until very recently, incredibly little was known about flood risk from groundwater in Staines (and elsewhere in the borough), perhaps not least because there is, remarkably, no statutory consultee in the planning system with responsibility to monitor and advise on this source.</p> <p>2.2 Groundwater flood risk is particularly acute in Staines because the town is built on a thin layer of gravel, varying in thickness from 1 to 5 metres, sitting on impermeable London clay. The gravel is particularly clean (ie lacking in clay) in the Staines area, facilitating more rapid transit of water through it and thus exacerbating the problem. Putting to one side whether it is necessary or sensible to build tower blocks of flats on sites that will flood, particular community concerns relate to the consequences of such developments. These include both their potential to increase flood risk for others in the area and the cost, even availability, of property insurance.</p> <p>2.3 Research last year by Royal Holloway, University of London, determined that groundwater was a source of flood risk in Staines at least equal to that from the river and surface water run-off (with the latter in fact adding to the problem with groundwater). When initial results of the research were first outlined in May 2024, Spelthorne Borough Council chose publicly to discount its findings because they had not been peer reviewed. Perhaps an added motivation for taking this position was the realisation that, if validated, the research would bring into serious question the Council's development plans for Staines.</p> <p>2.4 The research, with its findings unaltered, achieved independent scientific peer review validation in March 2025 (after completion of the Inspector's public examination of the Plan) in the prestigious Journal of Flood Risk Management.</p> <p>The full report is attached (click here).</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

2.5 In summary: The research shows how powerful, wildly variable and critically important groundwater flows are through the thin gravel substrate on which Staines is built; how they act independently of, but add materially to, flood-risk from the river and surface water run-off; how and where they produce discrete zones of significantly heightened flood risk. Barriers in the gravel substrate from the foundations and basements of existing buildings have significantly increased flood risks in Staines. New barriers, however shallow or deep, from new developments will add to the problem ... and the problem will therefore be further exacerbated a) the more there are of these new barriers both individually and as disturbed water-flows from them interact with each other, and b) from climate change.

2.6 As noted earlier, 5 sites for major developments have been removed from the Plan because of flood risk, and the Council originally said others had been delayed to later in the Plan period to take advantage of the proposed River Thames Scheme. However, and putting aside the questions now being raised publicly about whether the Scheme will go ahead within the timeline of the Local Plan, the Royal Holloway research also shows that this Scheme will have no material impact on the significant flood risk from groundwater.

2.7 The 5 sites of the original 19 proposed for development in Staines were completely withdrawn because the Environment Agency had identified them as being suitable only for water compatible development (as defined in the National Planning Policy Framework). It is now clear from the Royal Holloway research that, in addition to these sites, others are equally vulnerable to flood risk because of what is now known about groundwater impact and should be reconsidered in the proposed 'immediate review' of the Plan. The need for this also became very evident to those attending the presentation of the research by its lead author Dr Jonathan Paul at a public meeting on 6 May ([click here for presentation slides](#)). One of the community's concerns about the Plan's implementation in Staines is the Council's apparently ambiguous and casual attitude to flood risk. For example, the Council removed the massive riverside Bridge Street car park site (ST4/002) from the Plan explicitly "for residential and hotel purposes" (at the Environment Agency's insistence because of flood risk). Within days of seeking the Planning Inspector's approval to withdraw the site from the Plan, the Council signed a 250-year lease agreement with a developer for a large hotel (which would become the biggest building by far in Staines) on the site.

2.8 Recommended imperatives: Given the extreme importance and critically unpredictable impact of flood risk from groundwater in Staines, and the demonstrated potential for the foundations of new developments (however shallow or deep) to increase flood risk in the area around them:

- * Major developments proposed for Staines in years 1 – 5 of the Plan should be subject to reconsideration as part of the agreed 'immediate review' of the Plan.
- * Also as part of the 'immediate review', consideration should be given to strengthening and clarifying policies to ensure there is no risk of flooding from new developments to others in the area (not just that the risk should be mitigated).*
- * Any and all proposed new developments in Staines must (not should as in the proposed revision to the Level 1 SFRA referred to in policy E3 on managing flood risk) be subject to a) an independent hydrogeological risk assessment and b) a contractual undertaking by the developer that they accept full legal responsibility for any increased flood risk created for others in the area.

Question 4: Please use this text box to provide any other comments.

I attach herewith our response to the Council's consultation for your consideration.

Representations Received in Response to Main Modifications Consultation (in MM number order)

Attachments	
Attachment Name: LOCAL PLAN- RRSC PUBLIC CONSULTATION SUBMISSION 7 MAY pdf.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197293/PDF/-/LOCAL
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13018453&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15927380%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM87
Respondent: Mr Gary Clements (59412737)
Organisation:
Response ID: 13020085 (CO/74)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
No response
Question 4: Please use this text box to provide any other comments.
<p>I, and my wife, have been residents of Spelthorne since the 1960s in my case, and the 1940s for my wife. We still live in this borough, and cannot believe what you wish to do to this borough with your Local Plan.</p> <p>You have not considered the feelings of the “quiet majority” of council tax-paying residents who DO NOT want, or need, the excessive increase in residents proposed, or the buildings to house them.</p> <p>You have not fully considered the infrastructure required to deal with the following:</p> <p>1). Drainage; 2). Domestic Waste; 3). Utilities (Electricity, Gas, Water; 4). Health Services; 5). Education Services; 6). Policing; 7). Roads and Highways; 8). Public Transport.</p> <p>With an attitude that any problems will be sorted out in the future, your guidance for the future of Staines looks extremely bleak.</p> <p>With the financial losses that have already been made by Spelthorne Council, (and yet more influence from Central Government), no doubt yet even more council tax will be wasted on this Local Plan.</p> <p>And now, apart from flooding Staines with more people, and more flats, and more cars, perhaps you will flood Staines literally with the latest findings of the local groundwater flooding issues.</p> <p>Perhaps you should all resign and find proper professionals to take your positions.</p>
Attachments
<p>Link to comment:</p> <p>https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020085&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15927380%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM87	
Respondent: Judith Montford (19771841)	
Organisation: Environment Agency	
Response ID: 13022357 (CO/145)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Thank you for consulting the Environment Agency on the Spelthorne Local Plan - Main Modifications document.</p> <p>We have reviewed the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025 and Appendix C: Proposed Main Modification MM81: Policy E3: Managing Flood Risk and in summary we are happy with the modifications listed below to the local plan.</p> <p>PS – please check the site allocation modification numbers in the Sustainability Appraisal of Modification (Post Examination Addendum – Main Modifications April 2025). They do not all appear to tally with the numbers of the main modifications for the allocations in the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025.</p> <p>We thank you for these modifications that are proposed to be made to the plan.</p>	
Attachments	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022357&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15927380%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM87	
Respondent: Bernadette Garbutt (19819361)	
Organisation:	
Response ID: 13022933 (CO/163)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Dear Local Plan Team</p> <p>My concerns are about flooding in Staines due to water flows under a Staines are considerable and contribute more to flood risk than the river or surface water run-off. In fact surface water run off seeps into the ground and adds to the problem. Please see research on this matter by Dr Jonathan Paul from Royal Holloway University of London.</p>	
Attachments	
Attachment Name:	
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022933&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15927380%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM91
Respondent: Judith Montford (19771841)
Organisation: Environment Agency
Response ID: 13022389 (CO/146)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
No response
Question 4: Please use this text box to provide any other comments.
<p>Thank you for consulting the Environment Agency on the Spelthorne Local Plan - Main Modifications document.</p> <p>We have reviewed the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025 and Appendix C: Proposed Main Modification MM81: Policy E3: Managing Flood Risk and in summary we are happy with the modifications listed below to the local plan.</p> <p>PS – please check the site allocation modification numbers in the Sustainability Appraisal of Modification (Post Examination Addendum – Main Modifications April 2025). They do not all appear to tally with the numbers of the main modifications for the allocations in the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025.</p> <p>We thank you for these modifications that are proposed to be made to the plan.</p>
Attachments
<p>Link to comment:</p> <p>https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022389&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15927380%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM92
Respondent: Judith Montford (19771841)
Organisation: Environment Agency
Response ID: 13022421 (CO/147)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
No response
Question 4: Please use this text box to provide any other comments.
<p>Thank you for consulting the Environment Agency on the Spelthorne Local Plan - Main Modifications document.</p> <p>We have reviewed the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025 and Appendix C: Proposed Main Modification MM81: Policy E3: Managing Flood Risk and in summary we are happy with the modifications listed below to the local plan.</p> <p>PS – please check the site allocation modification numbers in the Sustainability Appraisal of Modification (Post Examination Addendum – Main Modifications April 2025). They do not all appear to tally with the numbers of the main modifications for the allocations in the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025.</p> <p>We thank you for these modifications that are proposed to be made to the plan.</p>
Attachments
<p>Link to comment:</p> <p>https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022421&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15927380%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM98	
Respondent: Steve Curley [DP9] (59484321)	
Organisation: Elysian Residences	
Response ID: 13021013 (CO/103)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>Draft Main Modifications 98 & 100 – Draft Policy E5</p> <p>In relation to the draft Policy E5, Elysian Residences are supportive of the proposed changes to this policy regarding the inclusion of sports and recreational facilities within the policy title. It is noted that this correlates with amendments to the emerging Local Plan Policies Map which removes sports and recreation facilities from the 'Urban Open Space' designations, which in turn has been amended to a 'Local Green Space' designation under draft Policy E5.</p> <p>Elysian Residences note that draft Policy E5 has been amended to be fully consistent with the National Planning Policy Framework (NPPF) and is therefore a justified approach which is consistent with national policy and therefore meets the criteria for 'soundness'.</p>	
Question 4: Please use this text box to provide any other comments.	
On behalf of Elysian Residences, please find attached written representations on the Main Modifications to the Pre-Submission Local Plan as part of the live public consultation.	
Attachments	
Attachment Name: Spelthorne Main Mods Reps 15052025.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198759/PDF/-/Spelthorne Main Mods Reps 15052025.pdf
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021013&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15928564%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM99	
Respondent: CARLO CARUSO (41938753)	
Organisation:	
Response ID: 13008885 (CO/4)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
Yes	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
I would invite to reword to also add "restore" and "enhance" sports facilities. Most of the playground and basketball courts in the area are not practically sound or viable. With this opportunity we want our Children to be able to have sports facilities like proper Basketballs courts so this wording should be amended correctly	
Attachments	
Attachment Name:	
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment:	
https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13008885&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15928564%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM100	
Respondent: Steve Curley [DP9] (59484321)	
Organisation: Elysian Residences	
Response ID: 13021045 (CO/104)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>Draft Main Modifications 98 & 100 – Draft Policy E5</p> <p>In relation to the draft Policy E5, Elysian Residences are supportive of the proposed changes to this policy regarding the inclusion of sports and recreational facilities within the policy title. It is noted that this correlates with amendments to the emerging Local Plan Policies Map which removes sports and recreation facilities from the 'Urban Open Space' designations, which in turn has been amended to a 'Local Green Space' designation under draft Policy E5.</p> <p>Elysian Residences note that draft Policy E5 has been amended to be fully consistent with the National Planning Policy Framework (NPPF) and is therefore a justified approach which is consistent with national policy and therefore meets the criteria for 'soundness'.</p>	
Question 4: Please use this text box to provide any other comments.	
On behalf of Elysian Residences, please find attached written representations on the Main Modifications to the Pre-Submission Local Plan as part of the live public consultation.	
Attachments	
Attachment Name: Spelthorne Main Mods Reps 15052025.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198764/PDF/-/Spelthorne Main Mods Reps 15052025.pdf
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021045&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15928564%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM101	
Respondent: Miss Lanica Agnew [Stantec] (58908417)	
Organisation: SEGRO	
Response ID: 13019701 (CO/62)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>6 Policy EC1: Meeting Employment Needs</p> <p>6.1 Main Modification Reference Number: MM 101</p> <p>6.1.1 SEGRO welcomes and supports the proposed main modifications to Policy EC1: Meeting Employment Needs.</p> <p>6.1.2 The modified wording is as follows:</p> <p>“The study was published prior to The COVID-19 pandemic 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>6.1.3 The reason for this modification is to ensure effectiveness of the policy and to demonstrate positive preparation of the Plan using up-to-date evidence (publication of the 2022 Employment Land Needs Assessment). SEGRO provided comments on the date of this evidence and exclusion of market signals in the Council’s Employment Land Needs Assessment. Notwithstanding this, we welcome this amendment as it recognises the ever-changing nature of the business environment, taking external factors into account. The inclusion of Policy ST3, further emphasises the importance of recognising that flexibility should be factored into this Plan.</p>	
Question 4: Please use this text box to provide any other comments.	
Please see attached Main Modifications Representations on behalf of SEGRO for Land at Sunbury. I also attach three Appendices.	
Attachments	
Attachment Name: 333101940 250508 A3 Land at Sunbury Main Modification Representations (FINAL).pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198161/PDF/-/333101940 250508 A3

Representations Received in Response to Main Modifications Consultation (in MM number order)

Attachment Name: Appendix 1 - Spelthorne Borough Council Local Plan Addendum Statement - Policy EC1 - SEGRO.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198182/PDF/-/Appendix 1
Attachment Name:	
Attachment Name:	
Link to comment:	https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019701&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15928884%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM102	
Respondent: Miss Lanica Agnew [Stantec] (58908417)	
Organisation: SEGRO	
Response ID: 13019733 (CO/63)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>6 Policy EC1: Meeting Employment Needs</p> <p>6.2 Main Modification Reference Number: MM 102</p> <p>6.2.1 Policy EC1 (1) reads 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> <p>Safeguarding employment land,</p> <p>Provision of new land floorspace in line with needs identified through the most up to date evidence and</p> <p>Encouraging its innovative re-use in ways that better meet the needs of the market whilst remaining within employment use.”</p> <p>6.2.2 Policy EC1 (1) seeks to ensure effectiveness of the policy and includes ‘floorspace’ rather than the word ‘land’. This reflects the position the Council have taken by not identifying or allocating new employment sites, rather rely on existing employment sites to meet a need.</p>	
Question 4: Please use this text box to provide any other comments.	
Please see attached Main Modifications Representations on behalf of SEGRO for Land at Sunbury. I also attach three Appendices.	
Attachments	
Attachment Name: 333101940 250508 A3 Land at Sunbury Main Modification Representations (FINAL).pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198163/PDF/-/333101940 250508 A3
Attachment Name: Appendix 1 - Spelthorne Borough Council Local Plan Addendum Statement - Policy EC1 - SEGRO.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198185/PDF/-/Appendix 1 -
Attachment Name:	
Attachment Name:	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Link to comment:

<https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019733&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15928884%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM103
Respondent: Miss Lanica Agnew [Stantec] (58908417)
Organisation: SEGRO
Response ID: 13019765 (CO/64)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>6 Policy EC1: Meeting Employment Needs</p> <p>6.3 Main Modification Reference Number: MM 103</p> <p>6.3.1 Policy EC1(4) reads as follows:</p> <p>“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)* • Windmill Road, Sunbury <p>*Shepperton Studios is not a preferred location for new office and R&D floorspace.”</p> <p>6.3.2 SEGRO support the Council’s recognition that the Shepperton Studios site’s preferred use is for film and television studio related use only. This gives assurance that employment use for B2/B8 use can only be considered on the other areas, which may not be able to accommodate future large-scale market driven development.</p> <p>Requested Change</p> <p>6.3.3 We would request the Policy recognises extensions to or land adjacent to these existing employment sites would be supported for employment purpose, subject to other policies in the Local Plan.</p>
Question 4: Please use this text box to provide any other comments.
Please see attached Main Modifications Representations on behalf of SEGRO for Land at Sunbury. I also attach three Appendices.

Representations Received in Response to Main Modifications Consultation (in MM number order)

Attachments	
Attachment Name: 333101940 250508 A3 Land at Sunbury Main Modification Representations (FINAL).pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198164/PDF/-/333101940 250508 A3
Attachment Name: Appendix 1 - Spelthorne Borough Council Local Plan Addendum Statement - Policy EC1 - SEGRO.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198186/PDF/-/Appendix 1 -
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019765&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15928884%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM108
Respondent: Mr Nigel Rowe (33516193)
Organisation: Riverside Residents (Staines) Coalition
Response ID: 13018677 (CO/30)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>3 Infrastructure</p> <p>3.1 As noted in the Introduction, the Local Plan calls for very significant growth in the population of Staines as well as a complete transformation of the town's appearance and character. The scale and scope of new infrastructure required to support this level of development and growth is massive. We define key infrastructure as disposal or domestic waste, drainage, water and power supply, health and education services, highways and public transport.</p> <p>3.2 Infrastructure delivery was subject to limited discussion in the Local Plan public examination. The Inspector asked the Council representative whether the Infrastructure Delivery Plan was up-to-date and that developers could find the information they needed in the current version. The Inspector was assured that it had been updated by consulting with delivery partners in 2024 (although it seems clear that some of them had not responded, and others had provided no new information in the latest round). Consequently, much of the information (on utilities for example) remains effectively out-of-date. Also, because of the way in which the Infrastructure Development Plan is structured and presented, it is nigh on impossible for developers to determine what type of contributions are expected of them and for which aspects.</p> <p>3.3 It therefore remains the case that the Local Plan offers 1) no clear understanding of the infrastructure required to support the significant number of new developments and population growth envisaged for Staines, and 2) no full assessment of the current shortfall in meeting these needs in critical areas such as domestic waste disposal, drainage, water and power supply, health and education services, highways and public transport. There is therefore also no clear view of the overall increased infrastructure costs needed to support the anticipated growth, or an effective 'gap analysis' in terms of the difference in costs vs. identified funding.</p> <p>3.4 Recommended imperative: The provision of key infrastructure cannot be left to an approach of "we'll work it out as we go along". Those things missing from the Plan in 3.3 above must be provided, examined and agreed as part of the 'immediate review' process, before any new major developments are approved for Staines.</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Question 4: Please use this text box to provide any other comments.	
I attach herewith our response to the Council's consultation for your consideration.	
Attachments	
Attachment Name: LOCAL PLAN- RRSC PUBLIC CONSULTATION SUBMISSION 7 MAY pdf.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197320/PDF/-/LOCAL
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13018677&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929652%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM108	
Respondent: Craig Hatton [Network Rail] (59464353)	
Organisation: Network Rail	
Response ID: 13019061 (CO/42)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>Policy ID1: Infrastructure and Delivery (MM108 and MM109)</p> <p>NR supports MM108 to update the period for which infrastructure needs are required to be identified.</p> <p>NR notes the amendment through MM109 and, whilst not in the Policy itself, still provides guidance for how SBC will deal with planning applications. NR supports the use of planning conditions to ensure the securing of necessary infrastructure and itself uses such conditions to secure necessary rail upgrades. Conditions are applied to phasing to ensure the necessary infrastructure to mitigate the impacts of development are in place, or at least funding is secured.</p> <p>At times, the infrastructure need is required prior to commencement of development due to its essential nature and flexibility should be provided to allow for this. Whilst the wording 'delivered ahead of the occupation of the relevant phase of development' could be interpreted as referring to prior to commencement of development, for clarity separate reference should be made. NR suggests the following amendment (in italics) to the proposed MM:</p> <p>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 prior to commencement or occupation of the relevant phase of development.</p> <p>Additionally, for clarity, the use of the conditions should not be restricted to the water network, which is how the proposed amendment through MM109 currently reads. NR suggests that the wording '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 prior to commencement or occupation of the relevant phase of development' be moved to a separate paragraph to make clear this can be applied by all infrastructure providers as necessary rather than wholly for the benefit of the water network.</p>	
Question 4: Please use this text box to provide any other comments.	
Please see attached NR representations to the consultation, ending 15 May 2025.	
Attachments	
Attachment Name: Network Rail response to Spelthorne Local Plan Main Modifications April 2025 (1).pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197634/PDF/-/Network
Attachment Name:	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Attachment Name:	
Attachment Name:	
Link to comment:	https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019061&row=1&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929652%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1&done=OBJChangesSaved

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM108
Respondent: Mr Gary Clements (59412737)
Organisation:
Response ID: 13020181 (CO/77)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
No response
Question 4: Please use this text box to provide any other comments.
<p>I, and my wife, have been residents of Spelthorne since the 1960s in my case, and the 1940s for my wife.</p> <p>We still live in this borough, and cannot believe what you wish to do to this borough with your Local Plan.</p> <p>You have not considered the feelings of the “quiet majority” of council tax-paying residents who DO NOT want, or need, the excessive increase in residents proposed, or the buildings to house them.</p> <p>You have not fully considered the infrastructure required to deal with the following:</p> <p>1). Drainage; 2). Domestic Waste; 3). Utilities (Electricity, Gas, Water; 4). Health Services; 5). Education Services; 6). Policing; 7). Roads and Highways; 8). Public Transport.</p> <p>With an attitude that any problems will be sorted out in the future, your guidance for the future of Staines looks extremely bleak.</p> <p>With the financial losses that have already been made by Spelthorne Council, (and yet more influence from Central Government), no doubt yet even more council tax will be wasted on this Local Plan.</p> <p>And now, apart from flooding Staines with more people, and more flats, and more cars, perhaps you will flood Staines literally with the latest findings of the local groundwater flooding issues.</p> <p>Perhaps you should all resign and find proper professionals to take your positions.</p>
Attachments
<p>Link to comment:</p> <p>https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020181&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929652%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM108
Respondent: Mrs Kath Sanders (19813377)
Organisation:
Response ID: 13021397 (CO/115)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
Yes
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>9. INFRASTRUCTURE AND DELIVERY</p> <p>Rationale: I do not believe that the Policies on Infrastructure and Delivery (ID1 and ID2), together with their Main Modifications, are yet sound. I don't believe they are positively prepared, justified by the supporting evidence, or that they will be effective over the plan period. The latest Infrastructure Delivery Plan is not up-to-date, it still has many gaps and provides no overview or gap analysis. It therefore makes it difficult for any applicant to know what is expected of them.</p> <p>Recommendation: A full overhaul is required as part of the "immediate review" and a schedule provided with an overall summary of costs and funding, along with a gap analysis.</p>
Question 4: Please use this text box to provide any other comments.
<p>Dear Sir,</p> <p>Many of the Main Modifications are welcome and justify the work that the Council, the Environment Agency and yourself have put in over two years in trying to make the Plan sound. The changes go a long way to explain "the horns of the dilemma" upon which you found yourself.</p> <p>The following Main Modifications are particularly welcome:</p> <ul style="list-style-type: none"> • the removal of 5 strategic site allocations due to flood risk • the imposition of a requirement to delay 11 further strategic site allocations until a safe route for access and egress can be provided - 8 in Staines and 3 in Shepperton • the imposition of a constraint to some strategic site allocations restricting development to the built footprint • a completely revised policy E3 on managing flood risk and significantly updated evidence base for flooding <p>However, a couple of sticking points remain, principally on groundwater flood risk, and I hope that the detailed comments below might prove useful.</p>
Attachments
<p>Link to comment:</p> <p>https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021397&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929652%26repIDstyle%3Dstarts%26repSta</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

[tus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1](#)

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM109	
Respondent: Mr Dan O'Sullivan (33720961)	
Organisation:	
Response ID: 13016533 (CO/9)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>Having read through most suggestions will improve Spelthorne measurably so should continue as suggested.</p> <p>We need to continue to factor in infrastructure enhancement when these go ahead such as an increase to social and welfare facilities as well as the additional parking needed.</p> <p>Finally I continue to champion the need for an increase in youth facilities in Ashford having a 2 and 8 year old. We should prioritise these as well as the support for the elderly to ensure we have a bright future in that part of the borough.</p> <p>Dan O'Sullivan Local Ashford Resident</p>	
Question 4: Please use this text box to provide any other comments.	
No response	
Attachments	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13016533&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929652%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM109
Respondent: Marc Hoenen (59377633)
Organisation:
Response ID: 13018069 (CO/19)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>We have reviewed the Local Plan that is currently out for consultation and were hoping to discuss a minor tweak to one of the policies.</p> <p>Proposed Modification to Draft Policy ID1:</p> <p>9) The Council will resist the loss or change of use of existing facilities unless it can be demonstrated that:</p> <p>(a) the facility is no longer needed for its existing purpose or viable for any other social or community use; or</p> <p>(b) the services can be re-provided in a facility of better quality on the same site or in an alternative location that is equally accessible to the community served; or</p> <p>© there is no requirement from any other public or voluntary service provider for an alternative community or social facility that could be met through a change of use or redevelopment.</p>
Question 4: Please use this text box to provide any other comments.
No response
Attachments
<p>Link to comment:</p> <p>https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13018069&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929652%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM109
Respondent: Mr Nigel Rowe (33516193)
Organisation: Riverside Residents (Staines) Coalition
Response ID: 13018709 (CO/31)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>3 Infrastructure</p> <p>3.1 As noted in the Introduction, the Local Plan calls for very significant growth in the population of Staines as well as a complete transformation of the town's appearance and character. The scale and scope of new infrastructure required to support this level of development and growth is massive. We define key infrastructure as disposal or domestic waste, drainage, water and power supply, health and education services, highways and public transport.</p> <p>3.2 Infrastructure delivery was subject to limited discussion in the Local Plan public examination. The Inspector asked the Council representative whether the Infrastructure Delivery Plan was up-to-date and that developers could find the information they needed in the current version. The Inspector was assured that it had been updated by consulting with delivery partners in 2024 (although it seems clear that some of them had not responded, and others had provided no new information in the latest round). Consequently, much of the information (on utilities for example) remains effectively out-of-date. Also, because of the way in which the Infrastructure Development Plan is structured and presented, it is nigh on impossible for developers to determine what type of contributions are expected of them and for which aspects.</p> <p>3.3 It therefore remains the case that the Local Plan offers 1) no clear understanding of the infrastructure required to support the significant number of new developments and population growth envisaged for Staines, and 2) no full assessment of the current shortfall in meeting these needs in critical areas such as domestic waste disposal, drainage, water and power supply, health and education services, highways and public transport. There is therefore also no clear view of the overall increased infrastructure costs needed to support the anticipated growth, or an effective 'gap analysis' in terms of the difference in costs vs. identified funding.</p> <p>3.4 Recommended imperative: The provision of key infrastructure cannot be left to an approach of "we'll work it out as we go along". Those things missing from the Plan in 3.3 above must be provided, examined and agreed as part of the 'immediate review' process, before any new major developments are approved for Staines.</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Question 4: Please use this text box to provide any other comments.	
I attach herewith our response to the Council's consultation for your consideration.	
Attachments	
Attachment Name: LOCAL PLAN- RRSC PUBLIC CONSULTATION SUBMISSION 7 MAY pdf.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197321/PDF/-/LOCAL
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13018709&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929652%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM109	
Respondent: Craig Hatton [Network Rail] (59464353)	
Organisation: Network Rail	
Response ID: 13019093 (CO/43)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>Policy ID1: Infrastructure and Delivery (MM108 and MM109)</p> <p>NR supports MM108 to update the period for which infrastructure needs are required to be identified.</p> <p>NR notes the amendment through MM109 and, whilst not in the Policy itself, still provides guidance for how SBC will deal with planning applications. NR supports the use of planning conditions to ensure the securing of necessary infrastructure and itself uses such conditions to secure necessary rail upgrades. Conditions are applied to phasing to ensure the necessary infrastructure to mitigate the impacts of development are in place, or at least funding is secured.</p> <p>At times, the infrastructure need is required prior to commencement of development due to its essential nature and flexibility should be provided to allow for this. Whilst the wording 'delivered ahead of the occupation of the relevant phase of development' could be interpreted as referring to prior to commencement of development, for clarity separate reference should be made. NR suggests the following amendment (in italics) to the proposed MM:</p> <p>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 prior to commencement or occupation of the relevant phase of development.</p> <p>Additionally, for clarity, the use of the conditions should not be restricted to the water network, which is how the proposed amendment through MM109 currently reads. NR suggests that the wording '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 prior to commencement or occupation of the relevant phase of development' be moved to a separate paragraph to make clear this can be applied by all infrastructure providers as necessary rather than wholly for the benefit of the water network.</p>	
Question 4: Please use this text box to provide any other comments.	
Please see attached NR representations to the consultation, ending 15 May 2025.	
Attachments	
Attachment Name: Network Rail response to Spelthorne Local Plan Main Modifications April 2025 (1).pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197637/PDF/-/Network
Attachment Name:	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Attachment Name:	
Attachment Name:	
Link to comment:	https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019093&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929652%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM109
Respondent: Mr Gary Clements (59412737)
Organisation:
Response ID: 13020117 (CO/75)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
No response
Question 4: Please use this text box to provide any other comments.
<p>Dear Spelthorne Councillors,</p> <p>I, and my wife, have been residents of Spelthorne since the 1960s in my case, and the 1940s for my wife. We still live in this borough, and cannot believe what you wish to do to this borough with your Local Plan.</p> <p>You have not considered the feelings of the “quiet majority” of council tax-paying residents who DO NOT want, or need, the excessive increase in residents proposed, or the buildings to house them.</p> <p>You have not fully considered the infrastructure required to deal with the following:</p> <p>1). Drainage; 2). Domestic Waste; 3). Utilities (Electricity, Gas, Water; 4). Health Services; 5). Education Services; 6). Policing; 7). Roads and Highways; 8). Public Transport.</p> <p>With an attitude that any problems will be sorted out in the future, your guidance for the future of Staines looks extremely bleak.</p> <p>With the financial losses that have already been made by Spelthorne Council, (and yet more influence from Central Government), no doubt yet even more council tax will be wasted on this Local Plan.</p> <p>And now, apart from flooding Staines with more people, and more flats, and more cars, perhaps you will flood Staines literally with the latest findings of the local groundwater flooding issues.</p> <p>Perhaps you should all resign and find proper professionals to take your positions.</p>
Attachments
<p>Link to comment:</p> <p>https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020117&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929652%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

[26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrep%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1](#)

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM109	
Respondent: Mrs Kath Sanders (19813377)	
Organisation:	
Response ID: 13021429 (CO/116)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>9. INFRASTRUCTURE AND DELIVERY</p> <p>Rationale: I do not believe that the Policies on Infrastructure and Delivery (ID1 and ID2), together with their Main Modifications, are yet sound. I don't believe they are positively prepared, justified by the supporting evidence, or that they will be effective over the plan period. The latest Infrastructure Delivery Plan is not up-to-date, it still has many gaps and provides no overview or gap analysis. It therefore makes it difficult for any applicant to know what is expected of them.</p> <p>Recommendation: A full overhaul is required as part of the "immediate review" and a schedule provided with an overall summary of costs and funding, along with a gap analysis.</p>	
Question 4: Please use this text box to provide any other comments.	
<p>Dear Sir,</p> <p>Many of the Main Modifications are welcome and justify the work that the Council, the Environment Agency and yourself have put in over two years in trying to make the Plan sound. The changes go a long way to explain "the horns of the dilemma" upon which you found yourself.</p> <p>The following Main Modifications are particularly welcome:</p> <ul style="list-style-type: none"> • the removal of 5 strategic site allocations due to flood risk • the imposition of a requirement to delay 11 further strategic site allocations until a safe route for access and egress can be provided - 8 in Staines and 3 in Shepperton • the imposition of a constraint to some strategic site allocations restricting development to the built footprint • a completely revised policy E3 on managing flood risk and significantly updated evidence base for flooding <p>However, a couple of sticking points remain, principally on groundwater flood risk, and I hope that the detailed comments below might prove useful.</p>	
Attachments	
Attachment Name:	
Attachment Name:	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Attachment Name:	
Attachment Name:	
Link to comment:	https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021429&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929652%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM109	
Respondent: Simon Cripps (33561057)	
Organisation:	
Response ID: 13024309 (CO/175)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>2. Strain on Local Infrastructure</p> <p>Delivering over 9,000 homes will have a significant impact on local infrastructure - schools, roads, healthcare, and public transport. Yet the Plan and its supporting documents appear to rely heavily on future infrastructure improvements, many of which remain unfunded or undefined. This puts current and future residents at risk of overstretched services and increased congestion, particularly in already densely populated areas.</p>	
Question 4: Please use this text box to provide any other comments.	
No response	
Attachments	
Attachment Name: Spelthorne Borough Council Local Plan Main Modifications Consultation.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1207893/PDF/-/Spelthorne
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13024309&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D%26repIDstyle%3Dstarts%26repStatus%3DP%252CM%252CR%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DmodifyDate%26dir%3Ddesc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM110	
Respondent: Mrs Kath Sanders (19813377)	
Organisation:	
Response ID: 13021461 (CO/117)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
Yes	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>9. INFRASTRUCTURE AND DELIVERY</p> <p>Rationale: I do not believe that the Policies on Infrastructure and Delivery (ID1 and ID2), together with their Main Modifications, are yet sound. I don't believe they are positively prepared, justified by the supporting evidence, or that they will be effective over the plan period. The latest Infrastructure Delivery Plan is not up-to-date, it still has many gaps and provides no overview or gap analysis. It therefore makes it difficult for any applicant to know what is expected of them.</p> <p>Recommendation: A full overhaul is required as part of the "immediate review" and a schedule provided with an overall summary of costs and funding, along with a gap analysis.</p>	
Question 4: Please use this text box to provide any other comments.	
<p>Dear Sir,</p> <p>Many of the Main Modifications are welcome and justify the work that the Council, the Environment Agency and yourself have put in over two years in trying to make the Plan sound. The changes go a long way to explain "the horns of the dilemma" upon which you found yourself.</p> <p>The following Main Modifications are particularly welcome:</p> <ul style="list-style-type: none"> • the removal of 5 strategic site allocations due to flood risk • the imposition of a requirement to delay 11 further strategic site allocations until a safe route for access and egress can be provided - 8 in Staines and 3 in Shepperton • the imposition of a constraint to some strategic site allocations restricting development to the built footprint • a completely revised policy E3 on managing flood risk and significantly updated evidence base for flooding <p>However, a couple of sticking points remain, principally on groundwater flood risk, and I hope that the detailed comments below might prove useful.</p>	
Attachments	
Attachment Name:	
Attachment Name:	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Attachment Name:	
Attachment Name:	
Link to comment:	https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021461&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929652%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D11

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM111	
Respondent: Craig Hatton [Network Rail] (59464353)	
Organisation: Network Rail	
Response ID: 13019125 (CO/44)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
Policy ID2: Sustainable Transport for New Developments (MM111, MM112, MM13, MM116 and MM118) NR supports the proposed main modifications MM111, MM112, MM113 and MM116 and MM118. For MM111, SBC should ensure that the IDP is updated at least annually as this is an iterative document which should provide for the most up-to-date infrastructure needs to support growth in the Borough.	
Question 4: Please use this text box to provide any other comments.	
Please see attached NR representations to the consultation, ending 15 May 2025.	
Attachments	
Attachment Name: Network Rail response to Spelthorne Local Plan Main Modifications April 2025 (1).pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197641/PDF/-/Network
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019125&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929972%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM111
Respondent: Nigel Walkden [National Highways] (59472961)
Organisation: National Highways
Response ID: 13019509 (CO/56)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
No response
Question 4: Please use this text box to provide any other comments.
<p>National Highways Ref: NH/25/11125</p> <p>Thank you for your email of 9 May inviting National Highways to comment on the above consultation and indicating that a response is required by 15 May 2025.</p> <p>National Highways was appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to this consultation, our principal interest is safeguarding the operation of the M25 at Junctions 13 and 14. M3 Junction 1 and A30.</p> <p>We have examined the main modifications including the revised allocations and estimated dates for delivery. While the changing allocations may affect the numbers of vehicular trips on the road network, we are content that the cumulative traffic changes from the plan at submission will be marginal and will not change our previous view as detailed in our Statement of Common Ground signed in January 2023. Therefore, we have no further comments to make through this consultation.</p>
Attachments
<p>Link to comment:</p> <p>https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019509&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929972%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM111
Respondent: Mr Gary Clements (59412737)
Organisation:
Response ID: 13020149 (CO/76)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
No response
Question 4: Please use this text box to provide any other comments.
<p>I, and my wife, have been residents of Spelthorne since the 1960s in my case, and the 1940s for my wife. We still live in this borough, and cannot believe what you wish to do to this borough with your Local Plan.</p> <p>You have not considered the feelings of the “quiet majority” of council tax-paying residents who DO NOT want, or need, the excessive increase in residents proposed, or the buildings to house them.</p> <p>You have not fully considered the infrastructure required to deal with the following:</p> <p>1). Drainage; 2). Domestic Waste; 3). Utilities (Electricity, Gas, Water; 4). Health Services; 5). Education Services; 6). Policing; 7). Roads and Highways; 8). Public Transport.</p> <p>With an attitude that any problems will be sorted out in the future, your guidance for the future of Staines looks extremely bleak.</p> <p>With the financial losses that have already been made by Spelthorne Council, (and yet more influence from Central Government), no doubt yet even more council tax will be wasted on this Local Plan.</p> <p>And now, apart from flooding Staines with more people, and more flats, and more cars, perhaps you will flood Staines literally with the latest findings of the local groundwater flooding issues.</p> <p>Perhaps you should all resign and find proper professionals to take your positions.</p>
Attachments
<p>Link to comment:</p> <p>https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020149&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929972%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM111
Respondent: Mrs Kath Sanders (19813377)
Organisation:
Response ID: 13021493 (CO/118)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
Yes
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>9. INFRASTRUCTURE AND DELIVERY</p> <p>Rationale: I do not believe that the Policies on Infrastructure and Delivery (ID1 and ID2), together with their Main Modifications, are yet sound. I don't believe they are positively prepared, justified by the supporting evidence, or that they will be effective over the plan period. The latest Infrastructure Delivery Plan is not up-to-date, it still has many gaps and provides no overview or gap analysis. It therefore makes it difficult for any applicant to know what is expected of them.</p> <p>Recommendation: A full overhaul is required as part of the "immediate review" and a schedule provided with an overall summary of costs and funding, along with a gap analysis.</p>
Question 4: Please use this text box to provide any other comments.
<p>Dear Sir,</p> <p>Many of the Main Modifications are welcome and justify the work that the Council, the Environment Agency and yourself have put in over two years in trying to make the Plan sound. The changes go a long way to explain "the horns of the dilemma" upon which you found yourself.</p> <p>The following Main Modifications are particularly welcome:</p> <ul style="list-style-type: none"> • the removal of 5 strategic site allocations due to flood risk • the imposition of a requirement to delay 11 further strategic site allocations until a safe route for access and egress can be provided - 8 in Staines and 3 in Shepperton • the imposition of a constraint to some strategic site allocations restricting development to the built footprint • a completely revised policy E3 on managing flood risk and significantly updated evidence base for flooding <p>However, a couple of sticking points remain, principally on groundwater flood risk, and I hope that the detailed comments below might prove useful.</p>
Attachments
<p>Link to comment:</p> <p>https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021493&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partID%3D15929972%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26last</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

[ModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1](#)

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM111	
Respondent: Simon Cripps (33561057)	
Organisation:	
Response ID: 13024341 (CO/176)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>2. Strain on Local Infrastructure</p> <p>Delivering over 9,000 homes will have a significant impact on local infrastructure - schools, roads, healthcare, and public transport. Yet the Plan and its supporting documents appear to rely heavily on future infrastructure improvements, many of which remain unfunded or undefined. This puts current and future residents at risk of overstretched services and increased congestion, particularly in already densely populated areas.</p>	
Question 4: Please use this text box to provide any other comments.	
No response	
Attachments	
Attachment Name: Spelthorne Borough Council Local Plan Main Modifications Consultation.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1207896/PDF/-/Spelthorne
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13024341&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D%26repIDstyle%3Dstarts%26repStatus%3DP%252CM%252CR%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DmodifyDate%26dir%3Ddesc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM112	
Respondent: CARLO CARUSO (41938753)	
Organisation:	
Response ID: 13008949 (CO/6)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
There is a continue and recurrent issue with public transport, reducing car parking without improving TFL services and private service (which are less favorable) it is not a sound decision.	
Question 4: Please use this text box to provide any other comments.	
We urge this Council to consider how to request more frequent and affordable public transport consider things like:	
1) Use of double deckers buses during schools times (which at the moment is little to none)	
2) Increase car parks near major stations or bus stations (which at the moment is the opposite)	
3) Define a plan to extend the TFL zone 6 to Ashford, Sunbury, Upper Haliford to increase the amount of public transport usage and then being able to reduce car parks	
Attachments	
Attachment Name:	
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment:	
https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13008949&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929972%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM112	
Respondent: Craig Hatton [Network Rail] (59464353)	
Organisation: Network Rail	
Response ID: 13019157 (CO/45)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>Policy ID2: Sustainable Transport for New Developments (MM111, MM112, MM13, MM116 and MM118)</p> <p>NR supports the proposed main modifications MM111, MM112, MM113 and MM116 and MM118.</p> <p>For MM112, to ensure that parts a) and b) can be assessed, NR should be consulted to provide comments on how accessibility to railway stations could be improved (for part a) and if there are any constraints on rail services that need to be considered which could impact on part b.</p>	
Question 4: Please use this text box to provide any other comments.	
Please see attached NR representations to the consultation, ending 15 May 2025.	
Attachments	
Attachment Name: Network Rail response to Spelthorne Local Plan Main Modifications April 2025 (1).pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197643/PDF/-/Network
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment:	
https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019157&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929972%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM112	
Respondent: Mrs Nikki Nicholson [Surrey County Council] (49092289)	
Organisation: Surrey County Council	
Response ID: 13019861 (CO/67)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
Policy ID2: Sustainable Transport for New Developments MM112: An additional criteria for assessing proposed parking reduction should be based on the accessibility to local services. Whilst this is mentioned in the text, it is not specifically referred to in the criteria. All other changes to ID2 are supported.	
Question 4: Please use this text box to provide any other comments.	
Please find attached the SCC response to the above consultation,	
Attachments	
Attachment Name:	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198318/PDF/-/SCC_Response_Spelthorne_Main_Modifications_Consultation_May_2025.pdf
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment:	
https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019861&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929972%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM112
Respondent: Mr Gary Clements (59412737)
Organisation:
Response ID: 13020213 (CO/78)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
No response
Question 4: Please use this text box to provide any other comments.
<p>I, and my wife, have been residents of Spelthorne since the 1960s in my case, and the 1940s for my wife. We still live in this borough, and cannot believe what you wish to do to this borough with your Local Plan.</p> <p>You have not considered the feelings of the “quiet majority” of council tax-paying residents who DO NOT want, or need, the excessive increase in residents proposed, or the buildings to house them.</p> <p>You have not fully considered the infrastructure required to deal with the following:</p> <p>1). Drainage; 2). Domestic Waste; 3). Utilities (Electricity, Gas, Water; 4). Health Services; 5). Education Services; 6). Policing; 7). Roads and Highways; 8). Public Transport.</p> <p>With an attitude that any problems will be sorted out in the future, your guidance for the future of Staines looks extremely bleak.</p> <p>With the financial losses that have already been made by Spelthorne Council, (and yet more influence from Central Government), no doubt yet even more council tax will be wasted on this Local Plan.</p> <p>And now, apart from flooding Staines with more people, and more flats, and more cars, perhaps you will flood Staines literally with the latest findings of the local groundwater flooding issues.</p> <p>Perhaps you should all resign and find proper professionals to take your positions.</p>
Attachments
<p>Link to comment:</p> <p>https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020213&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929972%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM112	
Respondent: Mrs Kath Sanders (19813377)	
Organisation:	
Response ID: 13021717 (CO/125)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
Yes	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>9. INFRASTRUCTURE AND DELIVERY</p> <p>Rationale: I do not believe that the Policies on Infrastructure and Delivery (ID1 and ID2), together with their Main Modifications, are yet sound. I don't believe they are positively prepared, justified by the supporting evidence, or that they will be effective over the plan period. The latest Infrastructure Delivery Plan is not up-to-date, it still has many gaps and provides no overview or gap analysis. It therefore makes it difficult for any applicant to know what is expected of them.</p> <p>Recommendation: A full overhaul is required as part of the "immediate review" and a schedule provided with an overall summary of costs and funding, along with a gap analysis.</p>	
Question 4: Please use this text box to provide any other comments.	
<p>Dear Sir,</p> <p>Many of the Main Modifications are welcome and justify the work that the Council, the Environment Agency and yourself have put in over two years in trying to make the Plan sound. The changes go a long way to explain "the horns of the dilemma" upon which you found yourself.</p> <p>The following Main Modifications are particularly welcome:</p> <ul style="list-style-type: none"> • the removal of 5 strategic site allocations due to flood risk • the imposition of a requirement to delay 11 further strategic site allocations until a safe route for access and egress can be provided - 8 in Staines and 3 in Shepperton • the imposition of a constraint to some strategic site allocations restricting development to the built footprint • a completely revised policy E3 on managing flood risk and significantly updated evidence base for flooding <p>However, a couple of sticking points remain, principally on groundwater flood risk, and I hope that the detailed comments below might prove useful.</p>	
Attachments	
Attachment Name:	
Attachment Name:	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Attachment Name:	
Attachment Name:	
Link to comment:	https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021717&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929972%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM113	
Respondent: Craig Hatton [Network Rail] (59464353)	
Organisation: Network Rail	
Response ID: 13019189 (CO/46)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
Policy ID2: Sustainable Transport for New Developments (MM111, MM112, MM13, MM116 and MM118) NR supports the proposed main modifications MM111, MM112, MM113 and MM116 and MM118.	
Question 4: Please use this text box to provide any other comments.	
Please see attached NR representations to the consultation, ending 15 May 2025.	
Attachments	
Attachment Name: Network Rail response to Spelthorne Local Plan Main Modifications April 2025 (1).pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197649/PDF/-/Network
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019189&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929972%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM113
Respondent: Mrs Kath Sanders (19813377)
Organisation:
Response ID: 13021557 (CO/120)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
Yes
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>9. INFRASTRUCTURE AND DELIVERY</p> <p>Rationale: I do not believe that the Policies on Infrastructure and Delivery (ID1 and ID2), together with their Main Modifications, are yet sound. I don't believe they are positively prepared, justified by the supporting evidence, or that they will be effective over the plan period. The latest Infrastructure Delivery Plan is not up-to-date, it still has many gaps and provides no overview or gap analysis. It therefore makes it difficult for any applicant to know what is expected of them.</p> <p>Recommendation: A full overhaul is required as part of the "immediate review" and a schedule provided with an overall summary of costs and funding, along with a gap analysis.</p>
Question 4: Please use this text box to provide any other comments.
<p>Dear Sir,</p> <p>Many of the Main Modifications are welcome and justify the work that the Council, the Environment Agency and yourself have put in over two years in trying to make the Plan sound. The changes go a long way to explain "the horns of the dilemma" upon which you found yourself.</p> <p>The following Main Modifications are particularly welcome:</p> <ul style="list-style-type: none"> • the removal of 5 strategic site allocations due to flood risk • the imposition of a requirement to delay 11 further strategic site allocations until a safe route for access and egress can be provided - 8 in Staines and 3 in Shepperton • the imposition of a constraint to some strategic site allocations restricting development to the built footprint • a completely revised policy E3 on managing flood risk and significantly updated evidence base for flooding <p>However, a couple of sticking points remain, principally on groundwater flood risk, and I hope that the detailed comments below might prove useful.</p>
Attachments
<p>Link to comment:</p> <p>https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021557&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929972%26repIDstyle%3Dstarts%26repSta</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

[tus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D11](#)

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM114
Respondent: Nigel Walkden [National Highways] (59472961)
Organisation: National Highways
Response ID: 13019541 (CO/57)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
No response
Question 4: Please use this text box to provide any other comments.
<p>National Highways Ref: NH/25/11125</p> <p>Thank you for your email of 9 May inviting National Highways to comment on the above consultation and indicating that a response is required by 15 May 2025.</p> <p>National Highways was appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to this consultation, our principal interest is safeguarding the operation of the M25 at Junctions 13 and 14. M3 Junction 1 and A30.</p> <p>We have examined the main modifications including the revised allocations and estimated dates for delivery. While the changing allocations may affect the numbers of vehicular trips on the road network, we are content that the cumulative traffic changes from the plan at submission will be marginal and will not change our previous view as detailed in our Statement of Common Ground signed in January 2023. Therefore, we have no further comments to make through this consultation.</p>
Attachments
<p>Link to comment:</p> <p>https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019541&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929972%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D11</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM114	
Respondent: Mrs Kath Sanders (19813377)	
Organisation:	
Response ID: 13021589 (CO/121)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
Yes	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>9. INFRASTRUCTURE AND DELIVERY</p> <p>Rationale: I do not believe that the Policies on Infrastructure and Delivery (ID1 and ID2), together with their Main Modifications, are yet sound. I don't believe they are positively prepared, justified by the supporting evidence, or that they will be effective over the plan period. The latest Infrastructure Delivery Plan is not up-to-date, it still has many gaps and provides no overview or gap analysis. It therefore makes it difficult for any applicant to know what is expected of them.</p> <p>Recommendation: A full overhaul is required as part of the "immediate review" and a schedule provided with an overall summary of costs and funding, along with a gap analysis.</p>	
Question 4: Please use this text box to provide any other comments.	
<p>Dear Sir,</p> <p>Many of the Main Modifications are welcome and justify the work that the Council, the Environment Agency and yourself have put in over two years in trying to make the Plan sound. The changes go a long way to explain "the horns of the dilemma" upon which you found yourself.</p> <p>The following Main Modifications are particularly welcome:</p> <ul style="list-style-type: none"> • the removal of 5 strategic site allocations due to flood risk • the imposition of a requirement to delay 11 further strategic site allocations until a safe route for access and egress can be provided - 8 in Staines and 3 in Shepperton • the imposition of a constraint to some strategic site allocations restricting development to the built footprint • a completely revised policy E3 on managing flood risk and significantly updated evidence base for flooding <p>However, a couple of sticking points remain, principally on groundwater flood risk, and I hope that the detailed comments below might prove useful.</p>	
Attachments	
Attachment Name:	
Attachment Name:	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Attachment Name:	
Attachment Name:	
Link to comment:	https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021589&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929972%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D11

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM115	
Respondent: Mrs Kath Sanders (19813377)	
Organisation:	
Response ID: 13021621 (CO/122)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
Yes	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>9. INFRASTRUCTURE AND DELIVERY</p> <p>Rationale: I do not believe that the Policies on Infrastructure and Delivery (ID1 and ID2), together with their Main Modifications, are yet sound. I don't believe they are positively prepared, justified by the supporting evidence, or that they will be effective over the plan period. The latest Infrastructure Delivery Plan is not up-to-date, it still has many gaps and provides no overview or gap analysis. It therefore makes it difficult for any applicant to know what is expected of them.</p> <p>Recommendation: A full overhaul is required as part of the "immediate review" and a schedule provided with an overall summary of costs and funding, along with a gap analysis.</p>	
Question 4: Please use this text box to provide any other comments.	
<p>Dear Sir,</p> <p>Many of the Main Modifications are welcome and justify the work that the Council, the Environment Agency and yourself have put in over two years in trying to make the Plan sound. The changes go a long way to explain "the horns of the dilemma" upon which you found yourself.</p> <p>The following Main Modifications are particularly welcome:</p> <ul style="list-style-type: none"> • the removal of 5 strategic site allocations due to flood risk • the imposition of a requirement to delay 11 further strategic site allocations until a safe route for access and egress can be provided - 8 in Staines and 3 in Shepperton • the imposition of a constraint to some strategic site allocations restricting development to the built footprint • a completely revised policy E3 on managing flood risk and significantly updated evidence base for flooding <p>However, a couple of sticking points remain, principally on groundwater flood risk, and I hope that the detailed comments below might prove useful.</p>	
Attachments	
Attachment Name:	
Attachment Name:	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Attachment Name:	
Attachment Name:	
Link to comment:	https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021621&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929972%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D11

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM116	
Respondent: Craig Hatton [Network Rail] (59464353)	
Organisation: Network Rail	
Response ID: 13019221 (CO/47)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
Policy ID2: Sustainable Transport for New Developments (MM111, MM112, MM13, MM116 and MM118) NR supports the proposed main modifications MM111, MM112, MM113 and MM116 and MM118.	
Question 4: Please use this text box to provide any other comments.	
Please see attached NR representations to the consultation, ending 15 May 2025.	
Attachments	
Attachment Name: Network Rail response to Spelthorne Local Plan Main Modifications April 2025 (1).pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197656/PDF/-/Network
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019221&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929972%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D11	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM116
Respondent: Nigel Walkden [National Highways] (59472961)
Organisation: National Highways
Response ID: 13019573 (CO/58)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
No response
Question 4: Please use this text box to provide any other comments.
<p>National Highways Ref: NH/25/11125</p> <p>Thank you for your email of 9 May inviting National Highways to comment on the above consultation and indicating that a response is required by 15 May 2025.</p> <p>National Highways was appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to this consultation, our principal interest is safeguarding the operation of the M25 at Junctions 13 and 14. M3 Junction 1 and A30.</p> <p>We have examined the main modifications including the revised allocations and estimated dates for delivery. While the changing allocations may affect the numbers of vehicular trips on the road network, we are content that the cumulative traffic changes from the plan at submission will be marginal and will not change our previous view as detailed in our Statement of Common Ground signed in January 2023. Therefore, we have no further comments to make through this consultation.</p>
Attachments
<p>Link to comment:</p> <p>https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019573&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929972%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D11</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM116
Respondent: Mrs Kath Sanders (19813377)
Organisation:
Response ID: 13021653 (CO/123)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
Yes
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>9. INFRASTRUCTURE AND DELIVERY</p> <p>Rationale: I do not believe that the Policies on Infrastructure and Delivery (ID1 and ID2), together with their Main Modifications, are yet sound. I don't believe they are positively prepared, justified by the supporting evidence, or that they will be effective over the plan period. The latest Infrastructure Delivery Plan is not up-to-date, it still has many gaps and provides no overview or gap analysis. It therefore makes it difficult for any applicant to know what is expected of them.</p> <p>Recommendation: A full overhaul is required as part of the "immediate review" and a schedule provided with an overall summary of costs and funding, along with a gap analysis.</p>
Question 4: Please use this text box to provide any other comments.
<p>MM116 - Amend paragraph 9.15</p> <p>Other: Typos etc x4</p> <ol style="list-style-type: none"> 1) Take out "forthcoming". 2) Amend "which will set out" to "which sets out" 3) Amend "militate" to "mitigate" (unless deliberately using "militate") 4) Amend "The Spelthorne LCWIP will provide a 10-year plan" to "The Spelthorne LCWIP provides a 10-year plan" <p>Dear Sir,</p> <p>Many of the Main Modifications are welcome and justify the work that the Council, the Environment Agency and yourself have put in over two years in trying to make the Plan sound. The changes go a long way to explain "the horns of the dilemma" upon which you found yourself.</p> <p>The following Main Modifications are particularly welcome:</p> <ul style="list-style-type: none"> • the removal of 5 strategic site allocations due to flood risk • the imposition of a requirement to delay 11 further strategic site allocations until a safe route for access and egress can be provided - 8 in Staines and 3 in Shepperton • the imposition of a constraint to some strategic site allocations restricting development to the built footprint

Representations Received in Response to Main Modifications Consultation (in MM number order)

<ul style="list-style-type: none"> a completely revised policy E3 on managing flood risk and significantly updated evidence base for flooding <p>However, a couple of sticking points remain, principally on groundwater flood risk, and I hope that the detailed comments below might prove useful.</p>	
Attachments	
Attachment Name:	
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021653&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929972%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D11	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM116	
Respondent: Simon Cripps (33561057)	
Organisation:	
Response ID: 13024373 (CO/177)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>2. Strain on Local Infrastructure</p> <p>Delivering over 9,000 homes will have a significant impact on local infrastructure - schools, roads, healthcare, and public transport. Yet the Plan and its supporting documents appear to rely heavily on future infrastructure improvements, many of which remain unfunded or undefined. This puts current and future residents at risk of overstretched services and increased congestion, particularly in already densely populated areas.</p>	
Question 4: Please use this text box to provide any other comments.	
No response	
Attachments	
Attachment Name: Spelthorne Borough Council Local Plan Main Modifications Consultation.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1207898/PDF/-/Spelthorne
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment:	
https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13024373&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D%26repIDstyle%3Dstarts%26repStatus%3DP%252CM%252CR%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DmodifyDate%26dir%3Ddesc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM117
Respondent: Nigel Walkden [National Highways] (59472961)
Organisation: National Highways
Response ID: 13019605 (CO/59)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
No response
Question 4: Please use this text box to provide any other comments.
<p>National Highways Ref: NH/25/11125</p> <p>Thank you for your email of 9 May inviting National Highways to comment on the above consultation and indicating that a response is required by 15 May 2025.</p> <p>National Highways was appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to this consultation, our principal interest is safeguarding the operation of the M25 at Junctions 13 and 14. M3 Junction 1 and A30.</p> <p>We have examined the main modifications including the revised allocations and estimated dates for delivery. While the changing allocations may affect the numbers of vehicular trips on the road network, we are content that the cumulative traffic changes from the plan at submission will be marginal and will not change our previous view as detailed in our Statement of Common Ground signed in January 2023. Therefore, we have no further comments to make through this consultation.</p>
Attachments
<p>Link to comment:</p> <p>https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019605&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929972%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D11</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM117	
Respondent: Mrs Kath Sanders (19813377)	
Organisation:	
Response ID: 13021685 (CO/124)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
Yes	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>9. INFRASTRUCTURE AND DELIVERY</p> <p>Rationale: I do not believe that the Policies on Infrastructure and Delivery (ID1 and ID2), together with their Main Modifications, are yet sound. I don't believe they are positively prepared, justified by the supporting evidence, or that they will be effective over the plan period. The latest Infrastructure Delivery Plan is not up-to-date, it still has many gaps and provides no overview or gap analysis. It therefore makes it difficult for any applicant to know what is expected of them.</p> <p>Recommendation: A full overhaul is required as part of the "immediate review" and a schedule provided with an overall summary of costs and funding, along with a gap analysis.</p>	
Question 4: Please use this text box to provide any other comments.	
<p>Dear Sir,</p> <p>Many of the Main Modifications are welcome and justify the work that the Council, the Environment Agency and yourself have put in over two years in trying to make the Plan sound. The changes go a long way to explain "the horns of the dilemma" upon which you found yourself.</p> <p>The following Main Modifications are particularly welcome:</p> <ul style="list-style-type: none"> • the removal of 5 strategic site allocations due to flood risk • the imposition of a requirement to delay 11 further strategic site allocations until a safe route for access and egress can be provided - 8 in Staines and 3 in Shepperton • the imposition of a constraint to some strategic site allocations restricting development to the built footprint • a completely revised policy E3 on managing flood risk and significantly updated evidence base for flooding <p>However, a couple of sticking points remain, principally on groundwater flood risk, and I hope that the detailed comments below might prove useful.</p>	
Attachments	
Attachment Name:	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Link to comment:

<https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021685&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929972%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D11>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM118	
Respondent: Craig Hatton [Network Rail] (59464353)	
Organisation: Network Rail	
Response ID: 13019253 (CO/48)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>Policy ID2: Sustainable Transport for New Developments (MM111, MM112, MM13, MM116 and MM118)</p> <p>NR supports the proposed main modifications MM111, MM112, MM113 and MM116 and MM118.</p> <p>For MM118, NR produce long term strategic planning documents for the South West Main Line (SWML) and other parts of the Wessex route which could impact on services through Spelthorne. These also set out opportunities for future improvements and where constraints exist that could impact on growth in the Borough. Moving forward, NR encourages SBC to include relevant railway documents as part of the Local Plan evidence base to assist in informing growth scenarios, site allocation selection and policies. NR welcomes further engagement with SBC and other stakeholders on this matter.</p>	
Question 4: Please use this text box to provide any other comments.	
Please see attached NR representations to the consultation, ending 15 May 2025.	
Attachments	
Attachment Name: Network Rail response to Spelthorne Local Plan Main Modifications April 2025 (1).pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197660/PDF/-/Network
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019253&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15929972%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D11	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM119	
Respondent: Stewart Pomeroy [Colne Valley Park Community Interest Co] (19545217)	
Organisation: Colne Valley Park Community Interest Company	
Response ID: 13019413 (CO/53)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>Policies ST4/-25 and ST1/043:</p> <p>We maintain our objections in relation to the Site Allocations (and related policies) in respect of ST4/025 (Coppermill Rd) and ST1/043 (London Road) and note that the MMs 1 affecting these sites in the Green Belt and CVRP do not amount to their deletion, which we requested.</p> <p>Our representations also highlighted a very important aspect of NPPF policy that should apply to both sites if they are to be allocated, namely:</p> <p>“We also highlight that no compensatory improvements to the Environment quality/ accessibility of remaining GB land are allowed for, in line with NPPF Para 142. This seems to be an absent feature from allocations being made in the Green Belt.”</p> <p>We therefore object that the MMs proposed do not go far enough and this means that this part of the Plan would not be sound in relation to national (NPPF) planning policy.</p> <p>Whilst our objections to these allocations in the CVRP go to the principle of allocation, if they are to be allocated consistency with national policy (former para 142) is important for the soundness test. Providing for the improvement of remaining GB land in these cases is also important for the enhancement of the CVRP which is the policy of Spelthorne Borough Council.</p> <p>We are conscious that there is also an issue of which version of the NPPF the Plan needs to be consistent with. The Plan was submitted under the ‘old’ NPPF which contained the para 142 we referred to. But, since then, in December 2024, a new NPPF has been published which changes this aspect of national policy, heralding the introduction of the ‘Golden Rules’ applying to housing allocations in the Green/ Grey Belt. Neither para 142 nor the golden rules appear to have been taken into account in the modifications proposed to the Plan. The plan needs to provide for more mitigation than it is doing, either way. Can this please be addressed?</p> <p>1 MM119 (sustainable transport for ST1/043, ST4/025 and others) and MM121 (flooding and safe access routes for ST4/025 and others)</p>	
Question 4: Please use this text box to provide any other comments.	
Please see the attached response to the above named consultation. Submitted for and on behalf of the Colne Valley Regional Park.	
Attachments	
Attachment Name: Spelthorne LP Major Modifications CVRP May 25.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197773/PDF/-/Spelthorne%20LP%20Major%20Modifications%20CVRP%20May%2025.pdf

Representations Received in Response to Main Modifications Consultation (in MM number order)

Link to comment:

<https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019413&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15930772%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM119	
Respondent: Mr James Guthrie (41857985)	
Organisation: Valor Real Estate Partners LLP	
Response ID: 13019957 (CO/70)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Dear Local Plan Team,</p> <p>Please find attached our May 2025 Written Statement for SN1/005, which reiterates our position that the plan would be unsound if our site was allocated in the Local Plan. This should be read alongside our January 2025 submission and email in December 2024, reattached.</p> <p>Allocating an unsuitable site for residential, when it is clearly more suitable for industrial, would be a blatant disregard of the requirements of positive plan preparation, when the Council's own evidence base has demonstrated the site as not appropriate for residential. Should the Inspector remain minded to not recommend any employment allocations in this Local Plan, then it is strongly recommended this land is removed from the Plan and left as 'white land' to enable appropriate consideration in the Local Plan Review.</p> <p>Should the Inspector proceed to recommend the Plan with this allocation retained, and the Council be minded to adopt, options to challenge the Local Plan will be considered.</p> <p>We please wish to speak at the next round of hearings on the matter. Please could you confirm receipt alongside details of hearings in due course?</p> <p>We would be happy to discuss with the Local Plan period in the interim, should you be minded to withdraw the Site.</p>	
Attachments	
Attachment Name: 130125_Northumberland Hearing Statement Update w APP.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198387/PDF/-/130125_Northumberland%20Hearing%20Statement%20Update%20w%20APP.pdf

Representations Received in Response to Main Modifications Consultation (in MM number order)

Attachment Name: Spelthorne Local Plan Hearings SN1005.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198388/PDF/-/Spelthorne%20Local%20Plan%20Hearings%20SN1005.pdf
Attachment Name: Q211041 Northumberland Close Hearing Written Statement V2.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198389/PDF/-/Q211041%20Northumberland%20Close%20Hearing%20Written%20Statement%20V2.pdf
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019957&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15930772%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM120	
Respondent: Mr Nigel Rowe (33516193)	
Organisation: Riverside Residents (Staines) Coalition	
Response ID: 13018773 (CO/33)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>4 Protecting heritage assets and sensitive areas</p> <p>4.1 Although perhaps of limited concern in relation to whether the developments envisaged for Staines can be delivered physically, they certainly cannot be delivered and at the same time be consistent with the Council's existing policies on the protection of heritage assets, the Conservation Area and riverfront. This is due principally to the removal from the Plan of the Staines Development Framework and all its provisions for 'zoning' (not least to limit the height of new developments in sensitive areas/sites).</p> <p>4.2 It seems that these aspects are now expected to be included in a Design Code (currently under development) which may or may not have equal force with the Local Plan. However, they can only be given equal force if the demands of the Design Code and the Local Plan are compatible. As things currently stand, the demands of the Local Plan trump whatever aspirations may be enshrined in a Design Code.</p> <p>4.3 Recommended imperative: Delivery of new major developments on sensitive sites in Staines should be subject to the demands of the Design Code (due for completion and approval before the autumn of 2025).</p>	
Question 4: Please use this text box to provide any other comments.	
I attach herewith our response to the Council's consultation for your consideration.	
Attachments	
Attachment Name: LOCAL PLAN- RRSC PUBLIC CONSULTATION SUBMISSION 7 MAY pdf.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197326/PDF/-/LOCAL%20PLAN-%20RRSC%20PUBLIC%20CONSULTATION%20SUBMISSION%207%20MAY%20pdf.pdf

Representations Received in Response to Main Modifications Consultation (in MM number order)

Attachment Name:	
Link to comment:	https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13018773&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15930772%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM120	
Respondent: Mr James Guthrie (41857985)	
Organisation: Valor Real Estate Partners LLP	
Response ID: 13019989 (CO/71)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Dear Local Plan Team,</p> <p>Please find attached our May 2025 Written Statement for SN1/005, which reiterates our position that the plan would be unsound if our site was allocated in the Local Plan. This should be read alongside our January 2025 submission and email in December 2024, reattached.</p> <p>Allocating an unsuitable site for residential, when it is clearly more suitable for industrial, would be a blatant disregard of the requirements of positive plan preparation, when the Council's own evidence base has demonstrated the site as not appropriate for residential. Should the Inspector remain minded to not recommend any employment allocations in this Local Plan, then it is strongly recommended this land is removed from the Plan and left as 'white land' to enable appropriate consideration in the Local Plan Review.</p> <p>Should the Inspector proceed to recommend the Plan with this allocation retained, and the Council be minded to adopt, options to challenge the Local Plan will be considered.</p> <p>We please wish to speak at the next round of hearings on the matter. Please could you confirm receipt alongside details of hearings in due course?</p> <p>We would be happy to discuss with the Local Plan period in the interim, should you be minded to withdraw the Site.</p>	
Attachments	
Attachment Name: 130125_Northumberland Hearing Statement Update w APP.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198392/PDF/-/130125_Northumberland%20Hearing%20Statement%20Update%20w%20APP.pdf

Representations Received in Response to Main Modifications Consultation (in MM number order)

Attachment Name: Spelthorne Local Plan Hearings SN1005.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198393/PDF/-/Spelthorne%20Local%20Plan%20Hearings%20SN1005.pdf
Attachment Name: Q211041 Northumberland Close Hearing Written Statement V2.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198394/PDF/-/Q211041%20Northumberland%20Close%20Hearing%20Written%20Statement%20V2.pdf
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019989&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15930772%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM120	
Respondent: Judith Montford (19771841)	
Organisation: Environment Agency	
Response ID: 13022453 (CO/148)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Thank you for consulting the Environment Agency on the Spelthorne Local Plan - Main Modifications document.</p> <p>We have reviewed the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025 and Appendix C: Proposed Main Modification MM81: Policy E3: Managing Flood Risk and in summary we are happy with the modifications listed below to the local plan.</p> <p>PS – please check the site allocation modification numbers in the Sustainability Appraisal of Modification (Post Examination Addendum – Main Modifications April 2025). They do not all appear to tally with the numbers of the main modifications for the allocations in the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025.</p> <p>We thank you for these modifications that are proposed to be made to the plan.</p>	
Attachments	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022453&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15930772%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM121
Respondent: Mr Nigel Rowe (33516193)
Organisation: Riverside Residents (Staines) Coalition
Response ID: 13018517 (CO/25)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>2 Flood risk</p> <p>2.1 Three sources of flood risk impact on Staines: From the river (fluvial), surface water run-off (pluvial), and groundwater. A good deal of solid data is available on flood risk from the river, for which the Environment Agency is the statutory consultee. The same is broadly true for surface water run-off, for which Surrey County Council is the statutory consultee. Until very recently, incredibly little was known about flood risk from groundwater in Staines (and elsewhere in the borough), perhaps not least because there is, remarkably, no statutory consultee in the planning system with responsibility to monitor and advise on this source.</p> <p>2.2 Groundwater flood risk is particularly acute in Staines because the town is built on a thin layer of gravel, varying in thickness from 1 to 5 metres, sitting on impermeable London clay. The gravel is particularly clean (ie lacking in clay) in the Staines area, facilitating more rapid transit of water through it and thus exacerbating the problem. Putting to one side whether it is necessary or sensible to build tower blocks of flats on sites that will flood, particular community concerns relate to the consequences of such developments. These include both their potential to increase flood risk for others in the area and the cost, even availability, of property insurance.</p> <p>2.3 Research last year by Royal Holloway, University of London, determined that groundwater was a source of flood risk in Staines at least equal to that from the river and surface water run-off (with the latter in fact adding to the problem with groundwater). When initial results of the research were first outlined in May 2024, Spelthorne Borough Council chose publicly to discount its findings because they had not been peer reviewed. Perhaps an added motivation for taking this position was the realisation that, if validated, the research would bring into serious question the Council's development plans for Staines.</p> <p>2.4 The research, with its findings unaltered, achieved independent scientific peer review validation in March 2025 (after completion of the Inspector's public examination of the Plan) in the prestigious Journal of Flood Risk Management. The full report is attached (click here).</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

2.5 In summary: The research shows how powerful, wildly variable and critically important groundwater flows are through the thin gravel substrate on which Staines is built; how they act independently of, but add materially to, flood-risk from the river and surface water run-off; how and where they produce discrete zones of significantly heightened flood risk. Barriers in the gravel substrate from the foundations and basements of existing buildings have significantly increased flood risks in Staines. New barriers, however shallow or deep, from new developments will add to the problem ... and the problem will therefore be further exacerbated a) the more there are of these new barriers both individually and as disturbed water-flows from them interact with each other, and b) from climate change.

2.6 As noted earlier, 5 sites for major developments have been removed from the Plan because of flood risk, and the Council originally said others had been delayed to later in the Plan period to take advantage of the proposed River Thames Scheme. However, and putting aside the questions now being raised publicly about whether the Scheme will go ahead within the timeline of the Local Plan, the Royal Holloway research also shows that this Scheme will have no material impact on the significant flood risk from groundwater.

2.7 The 5 sites of the original 19 proposed for development in Staines were completely withdrawn because the Environment Agency had identified them as being suitable only for water compatible development (as defined in the National Planning Policy Framework). It is now clear from the Royal Holloway research that, in addition to these sites, others are equally vulnerable to flood risk because of what is now known about groundwater impact and should be reconsidered in the proposed 'immediate review' of the Plan. The need for this also became very evident to those attending the presentation of the research by its lead author Dr Jonathan Paul at a public meeting on 6 May ([click here for presentation slides](#)). One of the community's concerns about the Plan's implementation in Staines is the Council's apparently ambiguous and casual attitude to flood risk. For example, the Council removed the massive riverside Bridge Street car park site (ST4/002) from the Plan explicitly "for residential and hotel purposes" (at the Environment Agency's insistence because of flood risk). Within days of seeking the Planning Inspector's approval to withdraw the site from the Plan, the Council signed a 250-year lease agreement with a developer for a large hotel (which would become the biggest building by far in Staines) on the site.

2.8 Recommended imperatives: Given the extreme importance and critically unpredictable impact of flood risk from groundwater in Staines, and the demonstrated potential for the foundations of new developments (however shallow or deep) to increase flood risk in the area around them:

- * Major developments proposed for Staines in years 1 – 5 of the Plan should be subject to reconsideration as part of the agreed 'immediate review' of the Plan.
- * Also as part of the 'immediate review', consideration should be given to strengthening and clarifying policies to ensure there is no risk of flooding from new developments to others in the area (not just that the risk should be mitigated).
- * Any and all proposed new developments in Staines must (not should as in the proposed revision to the Level 1 SFRA referred to in policy E3 on managing flood risk) be subject to a) an independent hydrogeological risk assessment and b) a contractual undertaking by the developer that they accept full legal responsibility for any increased flood risk created for others in the area.

Question 4: Please use this text box to provide any other comments.

Representations Received in Response to Main Modifications Consultation (in MM number order)

I attach herewith our response to the Council's consultation for your consideration.	
Attachments	
Attachment Name: LOCAL PLAN- RRSC PUBLIC CONSULTATION SUBMISSION 7 MAY pdf.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197309/PDF/-/LOCAL%20PLAN-%20RRSC%20PUBLIC%20CONSULTATION%20SUBMISSION%207%20MAY%20pdf.pdf
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13018517&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15930772%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM121	
Respondent: Stewart Pomeroy [Colne Valley Park Community Interest Co] (19545217)	
Organisation: Colne Valley Park Community Interest Company	
Response ID: 13019445 (CO/54)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>Policies ST4/-25 and ST1/043:</p> <p>We maintain our objections in relation to the Site Allocations (and related policies) in respect of ST4/025 (Coppermill Rd) and ST1/043 (London Road) and note that the MMs 1 affecting these sites in the Green Belt and CVRP do not amount to their deletion, which we requested.</p> <p>Our representations also highlighted a very important aspect of NPPF policy that should apply to both sites if they are to be allocated, namely:</p> <p>“We also highlight that no compensatory improvements to the Environment quality/ accessibility of remaining GB land are allowed for, in line with NPPF Para 142. This seems to be an absent feature from allocations being made in the Green Belt.”</p> <p>We therefore object that the MMs proposed do not go far enough and this means that this part of the Plan would not be sound in relation to national (NPPF) planning policy.</p> <p>Whilst our objections to these allocations in the CVRP go to the principle of allocation, if they are to be allocated consistency with national policy (former para 142) is important for the soundness test. Providing for the improvement of remaining GB land in these cases is also important for the enhancement of the CVRP which is the policy of Spelthorne Borough Council.</p> <p>We are conscious that there is also an issue of which version of the NPPF the Plan needs to be consistent with. The Plan was submitted under the ‘old’ NPPF which contained the para 142 we referred to. But, since then, in December 2024, a new NPPF has been published which changes this aspect of national policy, heralding the introduction of the ‘Golden Rules’ applying to housing allocations in the Green/ Grey Belt. Neither para 142 nor the golden rules appear to have been taken into account in the modifications proposed to the Plan. The plan needs to provide for more mitigation than it is doing, either way. Can this please be addressed?</p> <p>1 MM119 (sustainable transport for ST1/043, ST4/025 and others) and MM121 (flooding and safe access routes for ST4/025 and others)</p>	
Question 4: Please use this text box to provide any other comments.	
Please see the attached response to the above named consultation. Submitted for and on behalf of the Colne Valley Regional Park.	
Attachments	
Attachment Name: Spelthorne LP Major Modifications CVRP May 25.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197774/PDF/-/Spelthorne%20LP%20Major%20Modifications%20CVRP%20May%2025.pdf

Representations Received in Response to Main Modifications Consultation (in MM number order)

Attachment Name:	
Link to comment:	https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13019445&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15930772%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM122	
Respondent: Mr Nigel Rowe (33516193)	
Organisation: Riverside Residents (Staines) Coalition	
Response ID: 13018421 (CO/22)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>1.3 The Plan, with its proposed modifications, envisages the removal of 5 major developments and the delay of others to later in the 15-year Plan due to flood risk considerations. However, more than 14 major new developments have been retained with new families to be housed in close to 3,500 new homes, mostly in tower blocks of flats. Prior to attending and participating in every day of the Inspector's resumed public examination of the Plan in January and February 2025, we submitted a detailed critique of it, focusing on the 'main modifications' the Council has sought to make to it. This included a number of recommended changes which we held to be 'absolute imperatives'. This is attached (click here). The Inspector's public examination having now concluded, we believe more strongly that these are needed. In fact, in the case of flood risk, there is vital/critical and now peer reviewed evidence to support this view ... and there are still matters of concern relating to the Infrastructure Delivery Plan.</p> <p>1.4 Our conclusion (section 5 of this submission) is that the Council's welcome proposal to remove 5 sites in Staines for major developments, as well as to delay others to later in the 15-year Plan period, must also be considered for the very few remaining proposed developments in years 1-5 in Staines - notably Thameside House (site ST1/037) and the Oast House (site ST3/004) - at least pending completion and examination of the "immediate review" the Inspector has insisted on. This would enable proper consideration of the critical and now independently validated scientific flood risk research referenced in 1.2 above and in the following section.</p>	
Question 4: Please use this text box to provide any other comments.	
I attach herewith our response to the Council's consultation for your consideration.	
Attachments	
Attachment Name: LOCAL PLAN- RRSC PUBLIC CONSULTATION SUBMISSION 7 MAY pdf.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197272/PDF/-/LOCAL%20PLAN-%20RRSC%20PUBLIC%20CONSULTATION%20SUBMISSION%207%20MAY%20pdf.pdf

Representations Received in Response to Main Modifications Consultation (in MM number order)

Attachment Name:	
Link to comment:	https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13018421&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15931092%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrep%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DsubmitDate%26dir%3Dasc%26startRow%3D1

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM122
Respondent: Mrs Kath Sanders (19813377)
Organisation:
Response ID: 13021973 (CO/133)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
Yes
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>10. ALLOCATIONS</p> <p>3) ST3/004 (Oast House, Kingston Road) - mixed-use development including health and wellbeing centre (denoted as a “curve ball” in examination hearings)</p> <p>I believe there is a deliverability issue with strategic site allocation ST3/004 which will not be resolved in Years 1-5 of the plan period:</p> <ul style="list-style-type: none"> • planning application 23/00098/FUL (Kingston Road Car Park) <ul style="list-style-type: none"> o this was submitted by the Council early in 2023 but subsequently withdrawn in November 2023 o it was a Council proposal for a “mixed use development for new NHS Health and Wellbeing Centre, 184 residential flats, workspace and refurbishment of the Oast House to provide community / arts / workspace use with potential for café and theatre, and servicing and landscaping / amenity provision, together with associated parking, with disabled parking and drop off space only on site, and a decked parking solution on the Elmsleigh Centre surface car park” o the application is inextricably linked with the fate of the Staines Health & Wellbeing Centre • Staines Health & Wellbeing Centre <ul style="list-style-type: none"> o This was trailed as one of six Cavell Centres, which was a nationally inspired programme, however with no guaranteed funding attached o The government confirmed in 2023 that no central government funding would be forthcoming until at least the next comprehensive spending review (happening this spring) o ICB Surrey Heartlands status update, May 2024, indicated a lack of funding in the short-term for the Staines Health and Wellbeing Centre - Staines Health and Wellbeing Centre - ICS • current status (May 2025) <ul style="list-style-type: none"> o ST3/004 is still included as a strategic site allocation in Years 1-5 (ending in 2028/29) o The related planning application submitted by Council was withdrawn six months before ICB Surrey Heartlands declared in May 2024 that no funding was available - therefore currently the site hasn’t got planning approval or a live planning application o The Council has already spent several million on a failed application and has no funds to deliver any eventual project itself, so would need to find a partner or a buyer

Representations Received in Response to Main Modifications Consultation (in MM number order)

<p>o The latest information re national funding per the letter to Lincoln Jopp MP makes it clear that the government will not be providing any specific funding for the Staines “Cavell Centre” - see attached letter from Karin Smyth at the Department of Health & Social Care, 30th April 2025</p> <ul style="list-style-type: none"> • Conclusions <p>o officers are displaying “optimism bias” with regard to the deliverability of ST3/004 (Oast House, Kingston Road)</p> <p>o there is no funding for the applicant (the Council) to deliver the site themselves, no agreement on the Heath & Wellbeing Centre element of application proposal (which is integral to current stalled planning application), and little to no likelihood of site being delivered in Years 1-5, i.e. before end of 2028/29</p> <p>o NB it would be impractical to deliver in phases even if that were considered an option (i.e. housing first, health centre later), due to the nature of access on-site (itself a flaw in the application)</p> <p>That is aside from any flood risk issues highlighted in the now peer-reviewed research into groundwater flood risk by Dr Jonathan Paul, mentioned elsewhere in this response.</p> <p>Recommendation: This strategic site allocation is moved from Years 1-5 to Years 6-10.</p>	
<p>Question 4: Please use this text box to provide any other comments.</p>	
<p>Many of the Main Modifications are welcome and justify the work that the Council, the Environment Agency and yourself have put in over two years in trying to make the Plan sound. The changes go a long way to explain “the horns of the dilemma” upon which you found yourself.</p> <p>The following Main Modifications are particularly welcome:</p> <ul style="list-style-type: none"> • the removal of 5 strategic site allocations due to flood risk • the imposition of a requirement to delay 11 further strategic site allocations until a safe route for access and egress can be provided - 8 in Staines and 3 in Shepperton • the imposition of a constraint to some strategic site allocations restricting development to the built footprint • a completely revised policy E3 on managing flood risk and significantly updated evidence base for flooding <p>However, a couple of sticking points remain, principally on groundwater flood risk, and I hope that the detailed comments below might prove useful.</p>	
<p>Attachments</p>	
<p>Attachment Name: Dept of Health & Social Care letter to Lincoln Jopp MP - April 2025.jpg</p>	<p>https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198927/PJP/-/Dept%20of%20Health%20 %20Social%20Care%20letter%20to%20Lincoln%20Jopp%20MP%20-%20April%202025.jpg</p>
<p>Link to comment:</p> <p>https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021973&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15931092%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DsubmitDate%26dir%3Dasc%26startRow%3D1</p>	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM122	
Respondent: Judith Montford (19771841)	
Organisation: Environment Agency	
Response ID: 13022485 (CO/149)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Thank you for consulting the Environment Agency on the Spelthorne Local Plan - Main Modifications document.</p> <p>We have reviewed the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025 and Appendix C: Proposed Main Modification MM81: Policy E3: Managing Flood Risk and in summary we are happy with the modifications listed below to the local plan.</p> <p>PS – please check the site allocation modification numbers in the Sustainability Appraisal of Modification (Post Examination Addendum – Main Modifications April 2025). They do not all appear to tally with the numbers of the main modifications for the allocations in the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025.</p> <p>We thank you for these modifications that are proposed to be made to the plan.</p>	
Attachments	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022485&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15931092%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM123	
Respondent: Mr Nigel Rowe (33516193)	
Organisation: Riverside Residents (Staines) Coalition	
Response ID: 13018645 (CO/26)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
1.4 Our conclusion (section 5 of this submission) is that the Council's welcome proposal to remove 5 sites in Staines for major developments, as well as to delay others to later in the 15-year Plan period, must also be considered for the very few remaining proposed developments in years 1-5 in Staines - notably Thameside House (site ST1/037) and the Oast House (site ST3/004) - at least pending completion and examination of the "immediate review" the Inspector has insisted on. This would enable proper consideration of the critical and now independently validated scientific flood risk research referenced in 1.2 above and in the following section.	
Question 4: Please use this text box to provide any other comments.	
I attach herewith our response to the Council's consultation for your consideration.	
Attachments	
Attachment Name: LOCAL PLAN- RRSC PUBLIC CONSULTATION SUBMISSION 7 MAY pdf.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197316/PDF/-/LOCAL%20PLAN-%20RRSC%20PUBLIC%20CONSULTATION%20SUBMISSION%207%20MAY%20pdf.pdf
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13018645&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15931092%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DsubmitDate%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM123
Respondent: Mrs Kath Sanders (19813377)
Organisation:
Response ID: 13021749 (CO/126)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
Yes
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>10. ALLOCATIONS</p> <p>This section relates to additional Main Modifications I believe are required:</p> <p>1) Site-specific requirements are needed relating to flood risk, highlighted by the inclusion of MM123/124/144, the SFRA Level 2 (October 2024) and the text in the Strategic Sequential and Exception Test (Revision 5) published 29th April 2025, at para 4.20.</p> <p>MM123/124/144 relate to the addition of site-specific text on “built footprint” for site allocations AT1/012 (Ashford Community Centre), ST1/037 (Thameside House) and ST4/009 (Elmsleigh Centre) respectively.</p> <p>These three modifications regarding built footprint for these three sites in response to EA comments are welcome and I believe to be sound. However, it is noted that the SFRA Level 2 (October 2024), lists SIX sites in its summary where “the built footprint of the new development of the site should not exceed that of the existing development”, and suitable wording has been included in the Main Modifications for only two of these - AT1/012 (Ashford Community Centre) and ST4/009 (Elmsleigh Centre).</p> <p>The six sites listed SFRA Level 2 (October 2024) and repeated in the Council’s Flood Risk SS(E)T (Revision 5), para 3.11 (page 49), are as follows:</p> <ul style="list-style-type: none"> • ST1/031 Thameside Arts Centre, Wyatt Road, TW18 2AY • ST3/012 Staines Telephone Exchange, Fairfield Avenue, TW18 4AB • AT1/012 Ashford Community Centre, Woodthorpe Road • ST4/009 The Elmsleigh Centre and adjoining land, South Street • SH1/015 Shepperton Youth Centre, Laleham Road, TW17 8EJ • ST4/026 Communications House, South Street <p>It is understood that those are the six sites which are located entirely within the design flood extent and currently used for non-residential ‘Less Vulnerable’ uses. However, looking into the detail of SFRA Level 2 (October 2024), there are nine sites in total, where there is a constraint regarding the “built footprint”. The additional three sites (all in Staines) are as follows:</p> <ul style="list-style-type: none"> • ST1/028 Leacroft Centre, Leacroft

Representations Received in Response to Main Modifications Consultation (in MM number order)

- ST1/037 Thameside House, South Street
- ST4/004 96-104, Church Street

Suitable wording has been included in the Main Modifications for Thameside House by new MM124. However, the other two are not covered by a site-specific requirement regarding built footprint.

Therefore, only three of the nine sites, where “built footprint” is considered as a constraint in the detail of Strategic Flood Risk Assessment Level 2 (October 2024), have suitable wording in the site-specific requirements.

Given that the Council’s Flood Risk SS(E)T (Revision 5), para 4.20 (which talks about the six sites) states that “main modifications have been proposed to the Inspector ... that suitable wording regarding site design, layout and built footprint is added to the allocations”, it could be expected that suitable wording would be added to at least the first six sites, if not all nine sites.

Several were discussed in the hearings as part of previous MM 104 (24), which includes for example ST4/026 Communications House. I spoke to a senior officer at the time to ask that the flood constraints agreed at the E&S meeting from 29.02.24 were properly reflected in the main modifications. However, previous MM 104 (24) has been taken out completely in the latest schedule of Main Modifications (dated April 2025). Appendix D from that meeting on “Flood Risk Sites” is attached and linked here <https://democracy.spelthorne.gov.uk/documents/s61120/Appendix%20D%20-%20Flood%20Risk%20Sites.pdf>.

Recommendation - add suitable wording regarding “built footprint” for the remainder of the nine sites, those being as follows:

- ST1/031 Thameside Arts Centre, Wyatt Road, TW18 2AY
- ST3/012 Staines Telephone Exchange, Fairfield Avenue, TW18 4AB
- SH1/015 Shepperton Youth Centre, Laleham Road, TW17 8EJ
- ST4/026 Communications House, South Street
- ST1/028 Leacroft Centre, Leacroft
- ST4/004 96-104, Church Street

Question 4: Please use this text box to provide any other comments.

Dear Sir,
Many of the Main Modifications are welcome and justify the work that the Council, the Environment Agency and yourself have put in over two years in trying to make the Plan sound. The changes go a long way to explain “the horns of the dilemma” upon which you found yourself.

The following Main Modifications are particularly welcome:

- the removal of 5 strategic site allocations due to flood risk
- the imposition of a requirement to delay 11 further strategic site allocations until a safe route for access and egress can be provided - 8 in Staines and 3 in Shepperton
- the imposition of a constraint to some strategic site allocations restricting development to the built footprint
- a completely revised policy E3 on managing flood risk and significantly updated evidence base for flooding

However, a couple of sticking points remain, principally on groundwater flood risk, and I hope that the detailed comments below might prove useful.

Representations Received in Response to Main Modifications Consultation (in MM number order)

Attachments	
Attachment Name: E&S meeting 29 th Feb 2024 - Appendix D - Flood Risk Sites.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198908/PDF/-/E_S%20meeting%2029th%20Feb%202024%20-%20Appendix%20D%20-%20Flood%20Risk%20Sites.pdf
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021749&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15931092%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM123	
Respondent: Judith Montford (19771841)	
Organisation: Environment Agency	
Response ID: 13022517 (CO/150)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Thank you for consulting the Environment Agency on the Spelthorne Local Plan - Main Modifications document.</p> <p>We have reviewed the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025 and Appendix C: Proposed Main Modification MM81: Policy E3: Managing Flood Risk and in summary we are happy with the modifications listed below to the local plan.</p> <p>PS – please check the site allocation modification numbers in the Sustainability Appraisal of Modification (Post Examination Addendum – Main Modifications April 2025). They do not all appear to tally with the numbers of the main modifications for the allocations in the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025.</p> <p>We thank you for these modifications that are proposed to be made to the plan.</p>	
Attachments	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022517&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15931092%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM124
Respondent: Mr Nigel Rowe (33516193)
Organisation: Riverside Residents (Staines) Coalition
Response ID: 13018581 (CO/27)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
No response
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No response
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>2 Flood risk</p> <p>2.1 Three sources of flood risk impact on Staines: From the river (fluvial), surface water run-off (pluvial), and groundwater. A good deal of solid data is available on flood risk from the river, for which the Environment Agency is the statutory consultee. The same is broadly true for surface water run-off, for which Surrey County Council is the statutory consultee. Until very recently, incredibly little was known about flood risk from groundwater in Staines (and elsewhere in the borough), perhaps not least because there is, remarkably, no statutory consultee in the planning system with responsibility to monitor and advise on this source.</p> <p>2.2 Groundwater flood risk is particularly acute in Staines because the town is built on a thin layer of gravel, varying in thickness from 1 to 5 metres, sitting on impermeable London clay. The gravel is particularly clean (ie lacking in clay) in the Staines area, facilitating more rapid transit of water through it and thus exacerbating the problem. Putting to one side whether it is necessary or sensible to build tower blocks of flats on sites that will flood, particular community concerns relate to the consequences of such developments. These include both their potential to increase flood risk for others in the area and the cost, even availability, of property insurance.</p> <p>2.3 Research last year by Royal Holloway, University of London, determined that groundwater was a source of flood risk in Staines at least equal to that from the river and surface water run-off (with the latter in fact adding to the problem with groundwater). When initial results of the research were first outlined in May 2024, Spelthorne Borough Council chose publicly to discount its findings because they had not been peer reviewed. Perhaps an added motivation for taking this position was the realisation that, if validated, the research would bring into serious question the Council's development plans for Staines.</p> <p>2.4 The research, with its findings unaltered, achieved independent scientific peer review validation in March 2025 (after completion of the Inspector's public examination of the Plan) in the prestigious Journal of Flood Risk Management.</p> <p>The full report is attached (click here).</p>

Representations Received in Response to Main Modifications Consultation (in MM number order)

2.5 In summary: The research shows how powerful, wildly variable and critically important groundwater flows are through the thin gravel substrate on which Staines is built; how they act independently of, but add materially to, flood-risk from the river and surface water run-off; how and where they produce discrete zones of significantly heightened flood risk. Barriers in the gravel substrate from the foundations and basements of existing buildings have significantly increased flood risks in Staines. New barriers, however shallow or deep, from new developments will add to the problem ... and the problem will therefore be further exacerbated a) the more there are of these new barriers both individually and as disturbed water-flows from them interact with each other, and b) from climate change.

2.6 As noted earlier, 5 sites for major developments have been removed from the Plan because of flood risk, and the Council originally said others had been delayed to later in the Plan period to take advantage of the proposed River Thames Scheme. However, and putting aside the questions now being raised publicly about whether the Scheme will go ahead within the timeline of the Local Plan, the Royal Holloway research also shows that this Scheme will have no material impact on the significant flood risk from groundwater.

2.7 The 5 sites of the original 19 proposed for development in Staines were completely withdrawn because the Environment Agency had identified them as being suitable only for water compatible development (as defined in the National Planning Policy Framework). It is now clear from the Royal Holloway research that, in addition to these sites, others are equally vulnerable to flood risk because of what is now known about groundwater impact and should be reconsidered in the proposed 'immediate review' of the Plan. The need for this also became very evident to those attending the presentation of the research by its lead author Dr Jonathan Paul at a public meeting on 6 May ([click here for presentation slides](#)). One of the community's concerns about the Plan's implementation in Staines is the Council's apparently ambiguous and casual attitude to flood risk. For example, the Council removed the massive riverside Bridge Street car park site (ST4/002) from the Plan explicitly "for residential and hotel purposes" (at the Environment Agency's insistence because of flood risk). Within days of seeking the Planning Inspector's approval to withdraw the site from the Plan, the Council signed a 250-year lease agreement with a developer for a large hotel (which would become the biggest building by far in Staines) on the site.

2.8 Recommended imperatives: Given the extreme importance and critically unpredictable impact of flood risk from groundwater in Staines, and the demonstrated potential for the foundations of new developments (however shallow or deep) to increase flood risk in the area around them:

- * Major developments proposed for Staines in years 1 – 5 of the Plan should be subject to reconsideration as part of the agreed 'immediate review' of the Plan.
- * Also as part of the 'immediate review', consideration should be given to strengthening and clarifying policies to ensure there is no risk of flooding from new developments to others in the area (not just that the risk should be mitigated).
- * Any and all proposed new developments in Staines must (not should as in the proposed revision to the Level 1 SFRA referred to in policy E3 on managing flood risk) be subject to a) an independent hydrogeological risk assessment and b) a contractual undertaking by the developer that they accept full legal responsibility for any increased flood risk created for others in the area.

Question 4: Please use this text box to provide any other comments.

Representations Received in Response to Main Modifications Consultation (in MM number order)

I attach herewith our response to the Council's consultation for your consideration.	
Attachments	
Attachment Name: LOCAL PLAN- RRSC PUBLIC CONSULTATION SUBMISSION 7 MAY pdf.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197311/PDF/-/LOCAL%20PLAN-%20RRSC%20PUBLIC%20CONSULTATION%20SUBMISSION%207%20MAY%20pdf.pdf
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13018581&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15931092%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DsubmitDate%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM124	
Respondent: Mr Nigel Rowe (33516193)	
Organisation: Riverside Residents (Staines) Coalition	
Response ID: 13018645 (CO/29)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
1.4 Our conclusion (section 5 of this submission) is that the Council's welcome proposal to remove 5 sites in Staines for major developments, as well as to delay others to later in the 15-year Plan period, must also be considered for the very few remaining proposed developments in years 1-5 in Staines - notably Thameside House (site ST1/037) and the Oast House (site ST3/004) - at least pending completion and examination of the "immediate review" the Inspector has insisted on. This would enable proper consideration of the critical and now independently validated scientific flood risk research referenced in 1.2 above and in the following section.	
Question 4: Please use this text box to provide any other comments.	
I attach herewith our response to the Council's consultation for your consideration.	
Attachments	
Attachment Name: LOCAL PLAN- RRSC PUBLIC CONSULTATION SUBMISSION 7 MAY pdf.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197316/PDF/-/LOCAL%20PLAN-%20RRSC%20PUBLIC%20CONSULTATION%20SUBMISSION%207%20MAY%20pdf.pdf
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13018645&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15931092%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DsubmitDate%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM124
Respondent: Mrs Kath Sanders (19813377)
Organisation:
Response ID: 13021781 (CO/127)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
Yes
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>10. ALLOCATIONS</p> <p>This section relates to additional Main Modifications I believe are required:</p> <p>1) Site-specific requirements are needed relating to flood risk, highlighted by the inclusion of MM123/124/144, the SFRA Level 2 (October 2024) and the text in the Strategic Sequential and Exception Test (Revision 5) published 29th April 2025, at para 4.20.</p> <p>MM123/124/144 relate to the addition of site-specific text on “built footprint” for site allocations AT1/012 (Ashford Community Centre), ST1/037 (Thameside House) and ST4/009 (Elmsleigh Centre) respectively.</p> <p>These three modifications regarding built footprint for these three sites in response to EA comments are welcome and I believe to be sound. However, it is noted that the SFRA Level 2 (October 2024), lists SIX sites in its summary where “the built footprint of the new development of the site should not exceed that of the existing development”, and suitable wording has been included in the Main Modifications for only two of these - AT1/012 (Ashford Community Centre) and ST4/009 (Elmsleigh Centre).</p> <p>The six sites listed SFRA Level 2 (October 2024) and repeated in the Council’s Flood Risk SS(E)T (Revision 5), para 3.11 (page 49), are as follows:</p> <ul style="list-style-type: none"> • ST1/031 Thameside Arts Centre, Wyatt Road, TW18 2AY • ST3/012 Staines Telephone Exchange, Fairfield Avenue, TW18 4AB • AT1/012 Ashford Community Centre, Woodthorpe Road • ST4/009 The Elmsleigh Centre and adjoining land, South Street • SH1/015 Shepperton Youth Centre, Laleham Road, TW17 8EJ • ST4/026 Communications House, South Street <p>It is understood that those are the six sites which are located entirely within the design flood extent and currently used for non-residential ‘Less Vulnerable’ uses. However, looking into the detail of SFRA Level 2 (October 2024), there are nine sites in total, where there is a constraint regarding the “built footprint”. The additional three sites (all in Staines) are as follows:</p> <ul style="list-style-type: none"> • ST1/028 Leacroft Centre, Leacroft

Representations Received in Response to Main Modifications Consultation (in MM number order)

- ST1/037 Thameside House, South Street
- ST4/004 96-104, Church Street

Suitable wording has been included in the Main Modifications for Thameside House by new MM124. However, the other two are not covered by a site-specific requirement regarding built footprint.

Therefore, only three of the nine sites, where “built footprint” is considered as a constraint in the detail of Strategic Flood Risk Assessment Level 2 (October 2024), have suitable wording in the site-specific requirements.

Given that the Council’s Flood Risk SS(E)T (Revision 5), para 4.20 (which talks about the six sites) states that “main modifications have been proposed to the Inspector ... that suitable wording regarding site design, layout and built footprint is added to the allocations”, it could be expected that suitable wording would be added to at least the first six sites, if not all nine sites.

Several were discussed in the hearings as part of previous MM 104 (24), which includes for example ST4/026 Communications House. I spoke to a senior officer at the time to ask that the flood constraints agreed at the E&S meeting from 29.02.24 were properly reflected in the main modifications. However, previous MM 104 (24) has been taken out completely in the latest schedule of Main Modifications (dated April 2025). Appendix D from that meeting on “Flood Risk Sites” is attached and linked here <https://democracy.spelthorne.gov.uk/documents/s61120/Appendix%20D%20-%20Flood%20Risk%20Sites.pdf>.

Recommendation - add suitable wording regarding “built footprint” for the remainder of the nine sites, those being as follows:

- ST1/031 Thameside Arts Centre, Wyatt Road, TW18 2AY
- ST3/012 Staines Telephone Exchange, Fairfield Avenue, TW18 4AB
- SH1/015 Shepperton Youth Centre, Laleham Road, TW17 8EJ
- ST4/026 Communications House, South Street
- ST1/028 Leacroft Centre, Leacroft
- ST4/004 96-104, Church Street

Question 4: Please use this text box to provide any other comments.

Dear Sir,
Many of the Main Modifications are welcome and justify the work that the Council, the Environment Agency and yourself have put in over two years in trying to make the Plan sound. The changes go a long way to explain “the horns of the dilemma” upon which you found yourself.

The following Main Modifications are particularly welcome:

- the removal of 5 strategic site allocations due to flood risk
- the imposition of a requirement to delay 11 further strategic site allocations until a safe route for access and egress can be provided - 8 in Staines and 3 in Shepperton
- the imposition of a constraint to some strategic site allocations restricting development to the built footprint
- a completely revised policy E3 on managing flood risk and significantly updated evidence base for flooding

However, a couple of sticking points remain, principally on groundwater flood risk, and I hope that the detailed comments below might prove useful.

Representations Received in Response to Main Modifications Consultation (in MM number order)

Attachments	
Attachment Name: E&S meeting 29 th Feb 2024 - Appendix D - Flood Risk Sites.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198912/PDF/-/E_S%20meeting%2029th%20Feb%202024%20-%20Appendix%20D%20-%20Flood%20Risk%20Sites.pdf
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021781&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15931092%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM125
Respondent: Mrs Kath Sanders (19813377)
Organisation:
Response ID: 13021845 (CO/129)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
Yes
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>10. ALLOCATIONS</p> <p>2) HS1/012 (Land East of Upper Halliford, Nursery Road) and HS1/012b (Land East of Upper Halliford Road) - the two allocations are now both in Years 1-5, the latter incorporating “new sixth form facilities”, are not justified by the evidence and should at least be amalgamated.</p> <p>MM125 - MM128 relate to these two sites. It is accepted that “a new sixth form college” has been reduced to “new sixth form college facilities” (MM128). It is also apparent that both sites are owned by the same applicant and any distinction between them is effectively artificial. The development incorporating approx. 90 dwellings (70+20) will significantly harm the Green Belt, and the community will not get much in return. The applicant is maximising the return on a portion of Green Belt (by building 90 homes) and providing a new access road to Bishop Wand School which it could have done across its own land and from which it is the main beneficiary. As yet there are no plans in the public domain for any additional educational facilities, and, as such, these are unlikely to be delivered in Years 1-5 of the plan period, if at all. I don’t believe the two allocations are justified by the evidence, nor that the promised infrastructure will necessarily be forthcoming in the way it was first proposed. Recommendations: Further clarity is required on the evidence to justify the site allocations HS1/012 and HS1/012b, and whether the education facilities will also be provided in Years 1-5. These two site allocations should also be amalgamated.</p>
Question 4: Please use this text box to provide any other comments.
<p>Dear Sir,</p> <p>Many of the Main Modifications are welcome and justify the work that the Council, the Environment Agency and yourself have put in over two years in trying to make the Plan sound. The changes go a long way to explain “the horns of the dilemma” upon which you found yourself.</p> <p>The following Main Modifications are particularly welcome:</p> <ul style="list-style-type: none"> • the removal of 5 strategic site allocations due to flood risk • the imposition of a requirement to delay 11 further strategic site allocations until a safe route for access and egress can be provided - 8 in Staines and 3 in Shepperton • the imposition of a constraint to some strategic site allocations restricting development to the built footprint • a completely revised policy E3 on managing flood risk and significantly updated evidence base for flooding

Representations Received in Response to Main Modifications Consultation (in MM number order)

However, a couple of sticking points remain, principally on groundwater flood risk, and I hope that the detailed comments below might prove useful.	
Attachments	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021845&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D19813377%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D%26repIDstyle%3Dstarts%26repStatus%3DP%252CM%252CR%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3D%26%26sort%3DsubmitDate%26dir%3Ddesc%26startRow%3D11	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM125	
Respondent: Lauren Cadore [Iceni] (59392577)	
Organisation: Diocese of London	
Response ID: 13024053 (CO/167)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>b. MM125 to MM128: Site Allocations HS1/012 and HS1/012b</p> <p>As part of the published list of Main Modifications several minor amendments have been made to site allocations HS1/012 and HS1/012b outlined below: Proposed Main Modification MM125 increases the proposed allocation for residential C3 use from 60 units up to 70 units. We support this amendment to the site allocation which reflects the latest housing trajectory to help meet the boroughs housing need. We believe that site is suitable, achievable and deliverable to come forward for 70 units having masterplanned the site. This change is considered to make the Local Plan sound in relation to the effectiveness and positively prepared tests of soundness.</p>	
Question 4: Please use this text box to provide any other comments.	
No response	
Attachments	
Attachment Name: 250508 Main Modifications Representations May 2025 Final.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1207859/PDF/-/250508
Attachment Name:	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13024053&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D59392577%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D%26repIDstyle%3Dstarts%26repStatus%3DP%252CM%252CR%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3D%26%26sort%3DsubmitDate%26dir%3Ddesc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM126	
Respondent: Lauren Cadore [Iceni] (59392577)	
Organisation: Diocese of London	
Response ID: 13024085 (CO/168)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>b. MM125 to MM128: Site Allocations HS1/012 and HS1/012b</p> <p>As part of the published list of Main Modifications several minor amendments have been made to site allocations HS1/012 and HS1/012b outlined below:</p> <p>Proposed Main Modification MM126 seeks to remove text relating to the educational use of site allocation HS1/012. The following text in relation to Site HS1/012 is to be removed as part of the proposed Main Modifications:</p> <p>Surrey County Council as the education provider support additional sixth form development, subject to the supply of specific types of provision. This is to be agreed with the Council as part of the application process.</p> <p>Site allocation HS1/012 relates to residential use only. We therefore support the removal of the above wording from the Site allocation HS1/012 as this makes clear that the educational provision relates only to site HS1/012b. This change is considered to make the Local Plan sound in relation to the effectiveness test of soundness.</p>	
Question 4: Please use this text box to provide any other comments.	
No response	
Attachments	
Attachment Name: 250508 Main Modifications Representations May 2025 Final.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1207875/PDF/-/250508%20Main%20Modifications%20Representations%20May%202025%20Final.pdf
Link to comment:	
https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13024085&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partID%3D%26repIDstyle%3Dstarts%26repStatus%3DP%252CM%252CR%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Foffice%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DmodifyDate%26dir%3Ddesc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM126	
Respondent: Mrs Kath Sanders (19813377)	
Organisation:	
Response ID: 13021877 (CO/130)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
Yes	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>10. ALLOCATIONS</p> <p>2) HS1/012 (Land East of Upper Halliford, Nursery Road) and HS1/012b (Land East of Upper Halliford Road) - the two allocations are now both in Years 1-5, the latter incorporating “new sixth form facilities”, are not justified by the evidence and should at least be amalgamated.</p> <p>MM125 - MM128 relate to these two sites. It is accepted that “a new sixth form college” has been reduced to “new sixth form college facilities” (MM128). It is also apparent that both sites are owned by the same applicant and any distinction between them is effectively artificial. The development incorporating approx. 90 dwellings (70+20) will significantly harm the Green Belt, and the community will not get much in return. The applicant is maximising the return on a portion of Green Belt (by building 90 homes) and providing a new access road to Bishop Wand School which it could have done across its own land and from which it is the main beneficiary.</p>	
Question 4: Please use this text box to provide any other comments.	
<p>Dear Sir,</p> <p>Many of the Main Modifications are welcome and justify the work that the Council, the Environment Agency and yourself have put in over two years in trying to make the Plan sound. The changes go a long way to explain “the horns of the dilemma” upon which you found yourself.</p> <p>The following Main Modifications are particularly welcome:</p> <ul style="list-style-type: none"> • the removal of 5 strategic site allocations due to flood risk • the imposition of a requirement to delay 11 further strategic site allocations until a safe route for access and egress can be provided - 8 in Staines and 3 in Shepperton • the imposition of a constraint to some strategic site allocations restricting development to the built footprint • a completely revised policy E3 on managing flood risk and significantly updated evidence base for flooding <p>However, a couple of sticking points remain, principally on groundwater flood risk, and I hope that the detailed comments below might prove useful.</p>	
Attachments	
Attachment Name:	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Link to comment:

<https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021877&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15931092%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D11>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM127	
Respondent: Mrs Kath Sanders (19813377)	
Organisation:	
Response ID: 13021909 (CO/131)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
Yes	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>10. ALLOCATIONS</p> <p>2) HS1/012 (Land East of Upper Halliford, Nursery Road) and HS1/012b (Land East of Upper Halliford Road) - the two allocations are now both in Years 1-5, the latter incorporating “new sixth form facilities”, are not justified by the evidence and should at least be amalgamated.</p> <p>MM125 - MM128 relate to these two sites. It is accepted that “a new sixth form college” has been reduced to “new sixth form college facilities” (MM128). It is also apparent that both sites are owned by the same applicant and any distinction between them is effectively artificial. The development incorporating approx. 90 dwellings (70+20) will significantly harm the Green Belt, and the community will not get much in return. The applicant is maximising the return on a portion of Green Belt (by building 90 homes) and providing a new access road to Bishop Wand School which it could have done across its own land and from which it is the main beneficiary.</p>	
Question 4: Please use this text box to provide any other comments.	
<p>Dear Sir,</p> <p>Many of the Main Modifications are welcome and justify the work that the Council, the Environment Agency and yourself have put in over two years in trying to make the Plan sound. The changes go a long way to explain “the horns of the dilemma” upon which you found yourself.</p> <p>The following Main Modifications are particularly welcome:</p> <ul style="list-style-type: none"> • the removal of 5 strategic site allocations due to flood risk • the imposition of a requirement to delay 11 further strategic site allocations until a safe route for access and egress can be provided - 8 in Staines and 3 in Shepperton • the imposition of a constraint to some strategic site allocations restricting development to the built footprint • a completely revised policy E3 on managing flood risk and significantly updated evidence base for flooding <p>However, a couple of sticking points remain, principally on groundwater flood risk, and I hope that the detailed comments below might prove useful.</p>	
Attachments	
Attachment Name:	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Link to comment:

<https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021909&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15931092%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D11>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM127	
Respondent: Lauren Cadore [Iceni] (59392577)	
Organisation: Diocese of London	
Response ID: 13024117 (CO/169)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>b. MM125 to MM128: Site Allocations HS1/012 and HS1/012b</p> <p>As part of the published list of Main Modifications several minor amendments have been made to site allocations HS1/012 and HS1/012b outlined below:</p> <p>Proposed Main Modification MM127 changes the delivery timeframe of site allocation HS1/012b from years 6-10 of the emerging Local Plan to years 1-5 of the emerging Local Plan. We believe the site is available to come forward in the first five years of the emerging Local Plan and therefore support this amendment to the Site allocation. This will enable the Site to come forward for development alongside site HS1/012.</p> <p>This change is considered to make the Local Plan sound in relation to the effectiveness and positively prepared tests of soundness.</p>	
Question 4: Please use this text box to provide any other comments.	
No response	
Attachments	
Attachment Name: 250508 Main Modifications Representations May 2025 Final.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1207861/PDF/-/250508
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13024117&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D%26repIDstyle%3Dstarts%26repStatus%3DP%252CM%252CR%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DmodifyDate%26dir%3Ddesc%26startRow%3D11	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM128	
Respondent: Lauren Cadore [Iceni] (59392577)	
Organisation: Diocese of London	
Response ID: 13024149 (CO/170)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>b. MM125 to MM128: Site Allocations HS1/012 and HS1/012b</p> <p>As part of the published list of Main Modifications several minor amendments have been made to site allocations HS1/012 and HS1/012b outlined below: Proposed Main Modification MM128 provides minor amendments to HS2/012b. The following amendment has been proposed: The Provision of a for new sixth form college facilities supported by the provision of approximately 20 houses to enable the education provision development . We support MM128 which provides greater flexibility to allocation HS2/012b regarding the Site's educational use. The main modification is required to ensure that the sixth form provision can be provided in a flexible manner through a range of different options in the development management process. The previous wording was overly restrictive and would potentially frustrate its delivery within the first five years of the plan period. This change is considered to make the Local Plan sound in relation to the effectiveness and positively prepared tests of soundness.</p>	
Question 4: Please use this text box to provide any other comments.	
No response	
Attachments	
Attachment Name: 250508 Main Modifications Representations May 2025 Final.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1207863/PDF/-/250508
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13024149&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D%26repIDstyle%3Dstarts%26repStatus%3DP%252CM%252CR%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DmodifyDate%26dir%3Ddesc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM128	
Respondent: Mrs Kath Sanders (19813377)	
Organisation:	
Response ID: 13021941 (CO/132)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
Yes	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>10. ALLOCATIONS</p> <p>2) HS1/012 (Land East of Upper Halliford, Nursery Road) and HS1/012b (Land East of Upper Halliford Road) - the two allocations are now both in Years 1-5, the latter incorporating “new sixth form facilities”, are not justified by the evidence and should at least be amalgamated.</p> <p>MM125 - MM128 relate to these two sites. It is accepted that “a new sixth form college” has been reduced to “new sixth form college facilities” (MM128). It is also apparent that both sites are owned by the same applicant and any distinction between them is effectively artificial. The development incorporating approx. 90 dwellings (70+20) will significantly harm the Green Belt, and the community will not get much in return. The applicant is maximising the return on a portion of Green Belt (by building 90 homes) and providing a new access road to Bishop Wand School which it could have done across its own land and from which it is the main beneficiary.</p>	
Question 4: Please use this text box to provide any other comments.	
<p>Dear Sir,</p> <p>Many of the Main Modifications are welcome and justify the work that the Council, the Environment Agency and yourself have put in over two years in trying to make the Plan sound. The changes go a long way to explain “the horns of the dilemma” upon which you found yourself.</p> <p>The following Main Modifications are particularly welcome:</p> <ul style="list-style-type: none"> • the removal of 5 strategic site allocations due to flood risk • the imposition of a requirement to delay 11 further strategic site allocations until a safe route for access and egress can be provided - 8 in Staines and 3 in Shepperton • the imposition of a constraint to some strategic site allocations restricting development to the built footprint • a completely revised policy E3 on managing flood risk and significantly updated evidence base for flooding <p>However, a couple of sticking points remain, principally on groundwater flood risk, and I hope that the detailed comments below might prove useful.</p>	
Attachments	
Attachment Name:	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Link to comment:

<https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021941&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15931092%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D11>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM133	
Respondent: Judith Montford (19771841)	
Organisation: Environment Agency	
Response ID: 13022549 (CO/151)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Thank you for consulting the Environment Agency on the Spelthorne Local Plan - Main Modifications document.</p> <p>We have reviewed the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025 and Appendix C: Proposed Main Modification MM81: Policy E3: Managing Flood Risk and in summary we are happy with the modifications listed below to the local plan.</p> <p>PS – please check the site allocation modification numbers in the Sustainability Appraisal of Modification (Post Examination Addendum – Main Modifications April 2025). They do not all appear to tally with the numbers of the main modifications for the allocations in the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025.</p> <p>We thank you for these modifications that are proposed to be made to the plan.</p>	
Attachments	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022549&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15931092%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D11	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM135	
Respondent: Judith Montford (19771841)	
Organisation: Environment Agency	
Response ID: 13022581 (CO/152)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Thank you for consulting the Environment Agency on the Spelthorne Local Plan - Main Modifications document.</p> <p>We have reviewed the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025 and Appendix C: Proposed Main Modification MM81: Policy E3: Managing Flood Risk and in summary we are happy with the modifications listed below to the local plan.</p> <p>PS – please check the site allocation modification numbers in the Sustainability Appraisal of Modification (Post Examination Addendum – Main Modifications April 2025). They do not all appear to tally with the numbers of the main modifications for the allocations in the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025.</p> <p>We thank you for these modifications that are proposed to be made to the plan.</p>	
Attachments	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022581&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15932276%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DsubmitDate%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM136	
Respondent: Judith Montford (19771841)	
Organisation: Environment Agency	
Response ID: 13022613 (CO/153)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Thank you for consulting the Environment Agency on the Spelthorne Local Plan - Main Modifications document.</p> <p>We have reviewed the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025 and Appendix C: Proposed Main Modification MM81: Policy E3: Managing Flood Risk and in summary we are happy with the modifications listed below to the local plan.</p> <p>PS – please check the site allocation modification numbers in the Sustainability Appraisal of Modification (Post Examination Addendum – Main Modifications April 2025). They do not all appear to tally with the numbers of the main modifications for the allocations in the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025.</p> <p>We thank you for these modifications that are proposed to be made to the plan.</p>	
Attachments	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022613&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15932276%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DsubmitDate%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM137	
Respondent: Judith Montford (19771841)	
Organisation: Environment Agency	
Response ID: 13022645 (CO/154)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Thank you for consulting the Environment Agency on the Spelthorne Local Plan - Main Modifications document.</p> <p>We have reviewed the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025 and Appendix C: Proposed Main Modification MM81: Policy E3: Managing Flood Risk and in summary we are happy with the modifications listed below to the local plan.</p> <p>PS – please check the site allocation modification numbers in the Sustainability Appraisal of Modification (Post Examination Addendum – Main Modifications April 2025). They do not all appear to tally with the numbers of the main modifications for the allocations in the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025.</p> <p>We thank you for these modifications that are proposed to be made to the plan.</p>	
Attachments	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022645&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15932276%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DsubmitDate%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM138	
Respondent: Judith Montford (19771841)	
Organisation: Environment Agency	
Response ID: 13022677 (CO/155)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Thank you for consulting the Environment Agency on the Spelthorne Local Plan - Main Modifications document.</p> <p>We have reviewed the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025 and Appendix C: Proposed Main Modification MM81: Policy E3: Managing Flood Risk and in summary we are happy with the modifications listed below to the local plan.</p> <p>PS – please check the site allocation modification numbers in the Sustainability Appraisal of Modification (Post Examination Addendum – Main Modifications April 2025). They do not all appear to tally with the numbers of the main modifications for the allocations in the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025.</p> <p>We thank you for these modifications that are proposed to be made to the plan.</p>	
Attachments	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022677&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D19771841%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D%26repIDstyle%3Dstarts%26repStatus%3DP%252CM%252CR%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DpartId%26dir%3Dasc%26startRow%3D21	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM139	
Respondent: Judith Montford (19771841)	
Organisation: Environment Agency	
Response ID: 13022709 (CO/156)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Thank you for consulting the Environment Agency on the Spelthorne Local Plan - Main Modifications document.</p> <p>We have reviewed the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025 and Appendix C: Proposed Main Modification MM81: Policy E3: Managing Flood Risk and in summary we are happy with the modifications listed below to the local plan.</p> <p>PS – please check the site allocation modification numbers in the Sustainability Appraisal of Modification (Post Examination Addendum – Main Modifications April 2025). They do not all appear to tally with the numbers of the main modifications for the allocations in the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025.</p> <p>We thank you for these modifications that are proposed to be made to the plan.</p>	
Attachments	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022709&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15932276%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DsubmitDate%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM142	
Respondent: mr Ian Beardsmore (41415905)	
Organisation:	
Response ID: 13018037 (CO/18)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
<p>MM142 'Land At Spelthorne Grove'</p> <p>Originally the open space on this site was considered as two seperate parcels of land albeit contiguous with each other with no major physical seperation. Does this need clarifying?</p> <p>Given the proposed increase in number of dwelling it is essential that the same quantum of land (or more) is provided as open space in any new development...</p> <p>1) I do not oppose this open space being re-provided on another part of the site.</p> <p>2) If it would add flexibility I do not oppose this land being re-provided in up to three sepertrate parcels.</p> <p>However the parcel/s of land must be contiguous and NOT cobbled together from grass verges, triangles between service roads etc.</p> <p>3) Once established the parcel/s of land should be designated Local Green Space</p> <p>Parking:</p> <p>There is inadequate parking on the site now. Try parking there at 6 in the evening.</p> <p>That Sunbury Cross is a 'well connected' transport hub is a myth. It is very well served if you want to go East, North, or North West, ie into London. But routes south are very poor indeed. This neseditates a car for anyone going south, or west beyond Staines. Routes south are of course are further constrained because if you want to leave the Boro you have to use one of the bridges across the Thames all of which are choke points.</p> <p>As such any reductions in the parking provision on the grounds that Sunbury Cross is 'well connected' needs to be be strongly resisted.</p>	
Question 4: Please use this text box to provide any other comments.	
Enjoy !	
Attachments	
Attachment Name: LP IB 04 MM142 Land At Spelthorne Grove.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1197196/PDF/-/LP%20IB%2004%20MM142%20Land%20At%20Spelthorne%20Grove.pdf
Attachment Name:	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Link to comment:

<https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13018037&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15932276%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DsubmitDate%26dir%3Dasc%26startRow%3D1>

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM144
Respondent: Mrs Kath Sanders (19813377)
Organisation:
Response ID: 13021813 (CO/128)
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?
Yes
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?
No
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.
<p>10. ALLOCATIONS</p> <p>This section relates to additional Main Modifications I believe are required:</p> <p>1) Site-specific requirements are needed relating to flood risk, highlighted by the inclusion of MM123/124/144, the SFRA Level 2 (October 2024) and the text in the Strategic Sequential and Exception Test (Revision 5) published 29th April 2025, at para 4.20.</p> <p>MM123/124/144 relate to the addition of site-specific text on “built footprint” for site allocations AT1/012 (Ashford Community Centre), ST1/037 (Thameside House) and ST4/009 (Elmsleigh Centre) respectively.</p> <p>These three modifications regarding built footprint for these three sites in response to EA comments are welcome and I believe to be sound. However, it is noted that the SFRA Level 2 (October 2024), lists SIX sites in its summary where “the built footprint of the new development of the site should not exceed that of the existing development”, and suitable wording has been included in the Main Modifications for only two of these - AT1/012 (Ashford Community Centre) and ST4/009 (Elmsleigh Centre).</p> <p>The six sites listed SFRA Level 2 (October 2024) and repeated in the Council’s Flood Risk SS(E)T (Revision 5), para 3.11 (page 49), are as follows:</p> <ul style="list-style-type: none"> • ST1/031 Thameside Arts Centre, Wyatt Road, TW18 2AY • ST3/012 Staines Telephone Exchange, Fairfield Avenue, TW18 4AB • AT1/012 Ashford Community Centre, Woodthorpe Road • ST4/009 The Elmsleigh Centre and adjoining land, South Street • SH1/015 Shepperton Youth Centre, Laleham Road, TW17 8EJ • ST4/026 Communications House, South Street <p>It is understood that those are the six sites which are located entirely within the design flood extent and currently used for non-residential ‘Less Vulnerable’ uses. However, looking into the detail of SFRA Level 2 (October 2024), there are nine sites in total, where there is a constraint regarding the “built footprint”. The additional three sites (all in Staines) are as follows:</p> <ul style="list-style-type: none"> • ST1/028 Leacroft Centre, Leacroft

Representations Received in Response to Main Modifications Consultation (in MM number order)

- ST1/037 Thameside House, South Street
- ST4/004 96-104, Church Street

Suitable wording has been included in the Main Modifications for Thameside House by new MM124. However, the other two are not covered by a site-specific requirement regarding built footprint.

Therefore, only three of the nine sites, where “built footprint” is considered as a constraint in the detail of Strategic Flood Risk Assessment Level 2 (October 2024), have suitable wording in the site-specific requirements.

Given that the Council’s Flood Risk SS(E)T (Revision 5), para 4.20 (which talks about the six sites) states that “main modifications have been proposed to the Inspector ... that suitable wording regarding site design, layout and built footprint is added to the allocations”, it could be expected that suitable wording would be added to at least the first six sites, if not all nine sites.

Several were discussed in the hearings as part of previous MM 104 (24), which includes for example ST4/026 Communications House. I spoke to a senior officer at the time to ask that the flood constraints agreed at the E&S meeting from 29.02.24 were properly reflected in the main modifications. However, previous MM 104 (24) has been taken out completely in the latest schedule of Main Modifications (dated April 2025). Appendix D from that meeting on “Flood Risk Sites” is attached and linked here <https://democracy.spelthorne.gov.uk/documents/s61120/Appendix%20D%20-%20Flood%20Risk%20Sites.pdf>.

Recommendation - add suitable wording regarding “built footprint” for the remainder of the nine sites, those being as follows:

- ST1/031 Thameside Arts Centre, Wyatt Road, TW18 2AY
- ST3/012 Staines Telephone Exchange, Fairfield Avenue, TW18 4AB
- SH1/015 Shepperton Youth Centre, Laleham Road, TW17 8EJ
- ST4/026 Communications House, South Street
- ST1/028 Leacroft Centre, Leacroft
- ST4/004 96-104, Church Street

Question 4: Please use this text box to provide any other comments.

Dear Sir,
Many of the Main Modifications are welcome and justify the work that the Council, the Environment Agency and yourself have put in over two years in trying to make the Plan sound. The changes go a long way to explain “the horns of the dilemma” upon which you found yourself.

The following Main Modifications are particularly welcome:

- the removal of 5 strategic site allocations due to flood risk
- the imposition of a requirement to delay 11 further strategic site allocations until a safe route for access and egress can be provided - 8 in Staines and 3 in Shepperton
- the imposition of a constraint to some strategic site allocations restricting development to the built footprint
- a completely revised policy E3 on managing flood risk and significantly updated evidence base for flooding

However, a couple of sticking points remain, principally on groundwater flood risk, and I hope that the detailed comments below might prove useful.

Representations Received in Response to Main Modifications Consultation (in MM number order)

Attachments	
Attachment Name: E&S meeting 29th Feb 2024 - Appendix D - Flood Risk Sites.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198913/PDF/-/E_S%20meeting%2029th%20Feb%202024%20-%20Appendix%20D%20-%20Flood%20Risk%20Sites.pdf
Attachment Name:	
Link to comment:	https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13021813&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15932276%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DsubmitDate%26dir%3Dasc%26startRow%3D1

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM144	
Respondent: Judith Montford (19771841)	
Organisation: Environment Agency	
Response ID: 13022741 (CO/157)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Thank you for consulting the Environment Agency on the Spelthorne Local Plan - Main Modifications document.</p> <p>We have reviewed the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025 and Appendix C: Proposed Main Modification MM81: Policy E3: Managing Flood Risk and in summary we are happy with the modifications listed below to the local plan.</p> <p>PS – please check the site allocation modification numbers in the Sustainability Appraisal of Modification (Post Examination Addendum – Main Modifications April 2025). They do not all appear to tally with the numbers of the main modifications for the allocations in the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025.</p> <p>We thank you for these modifications that are proposed to be made to the plan.</p>	
Attachments	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022741&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15932276%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DsubmitDate%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM146	
Respondent: Mr James Guthrie (41857985)	
Organisation: Valor Real Estate Partners LLP	
Response ID: 13020021 (CO/72)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Dear Local Plan Team,</p> <p>Please find attached our May 2025 Written Statement for SN1/005, which reiterates our position that the plan would be unsound if our site was allocated in the Local Plan. This should be read alongside our January 2025 submission and email in December 2024, reattached.</p> <p>Allocating an unsuitable site for residential, when it is clearly more suitable for industrial, would be a blatant disregard of the requirements of positive plan preparation, when the Council's own evidence base has demonstrated the site as not appropriate for residential. Should the Inspector remain minded to not recommend any employment allocations in this Local Plan, then it is strongly recommended this land is removed from the Plan and left as 'white land' to enable appropriate consideration in the Local Plan Review.</p> <p>Should the Inspector proceed to recommend the Plan with this allocation retained, and the Council be minded to adopt, options to challenge the Local Plan will be considered.</p> <p>We please wish to speak at the next round of hearings on the matter. Please could you confirm receipt alongside details of hearings in due course?</p> <p>We would be happy to discuss with the Local Plan period in the interim, should you be minded to withdraw the Site.</p>	
Attachments	
Attachment Name: 130125_Northumberland Hearing Statement Update w APP.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198395/PDF/-/130125_Northumberland%20Hearing%20Statement%20Update%20w%20APP.pdf

Representations Received in Response to Main Modifications Consultation (in MM number order)

Attachment Name: Spelthorne Local Plan Hearings SN1005.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198396/PDF/-/Spelthorne%20Local%20Plan%20Hearings%20SN1005.pdf
Attachment Name: Q211041 Northumberland Close Hearing Written Statement V2.pdf	https://spelthorne.inconsult.uk/gf2.ti/af/1726306/1198397/PDF/-/Q211041%20Northumberland%20Close%20Hearing%20Written%20Statement%20V2.pdf
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13020021&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15933364%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DsubmitDate%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM147	
Respondent: Judith Montford (19771841)	
Organisation: Environment Agency	
Response ID: 13022773 (CO/158)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Thank you for consulting the Environment Agency on the Spelthorne Local Plan - Main Modifications document.</p> <p>We have reviewed the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025 and Appendix C: Proposed Main Modification MM81: Policy E3: Managing Flood Risk and in summary we are happy with the modifications listed below to the local plan.</p> <p>PS – please check the site allocation modification numbers in the Sustainability Appraisal of Modification (Post Examination Addendum – Main Modifications April 2025). They do not all appear to tally with the numbers of the main modifications for the allocations in the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025.</p> <p>We thank you for these modifications that are proposed to be made to the plan.</p>	
Attachments	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022773&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15933364%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DsubmitDate%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM148	
Respondent: Judith Montford (19771841)	
Organisation: Environment Agency	
Response ID: 13022805 (CO/159)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Thank you for consulting the Environment Agency on the Spelthorne Local Plan - Main Modifications document.</p> <p>We have reviewed the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025 and Appendix C: Proposed Main Modification MM81: Policy E3: Managing Flood Risk and in summary we are happy with the modifications listed below to the local plan.</p> <p>PS – please check the site allocation modification numbers in the Sustainability Appraisal of Modification (Post Examination Addendum – Main Modifications April 2025). They do not all appear to tally with the numbers of the main modifications for the allocations in the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025.</p> <p>We thank you for these modifications that are proposed to be made to the plan.</p>	
Attachments	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022805&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15933364%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DsubmitDate%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM149	
Respondent: Judith Montford (19771841)	
Organisation: Environment Agency	
Response ID: 13022837 (CO/160)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Thank you for consulting the Environment Agency on the Spelthorne Local Plan - Main Modifications document.</p> <p>We have reviewed the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025 and Appendix C: Proposed Main Modification MM81: Policy E3: Managing Flood Risk and in summary we are happy with the modifications listed below to the local plan.</p> <p>PS – please check the site allocation modification numbers in the Sustainability Appraisal of Modification (Post Examination Addendum – Main Modifications April 2025). They do not all appear to tally with the numbers of the main modifications for the allocations in the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025.</p> <p>We thank you for these modifications that are proposed to be made to the plan.</p>	
Attachments	
Attachment Name:	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022837&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15933364%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DsubmitDate%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)

Main Modifications number: MM150	
Respondent: Judith Montford (19771841)	
Organisation: Environment Agency	
Response ID: 13022869 (CO/161)	
Question 1: Do you consider this Main Modification makes the Spelthorne Local Plan legally compliant?	
No response	
Question 2: Do you consider this Main Modification makes the Spelthorne Local Plan sound?	
No response	
Question 3: Please provide details as to why or why not you think the proposed Main Modification are legally compliant and/or makes the Spelthorne Local Plan sound. Please be as precise as possible and provide evidence to support this.	
No response	
Question 4: Please use this text box to provide any other comments.	
<p>Thank you for consulting the Environment Agency on the Spelthorne Local Plan - Main Modifications document.</p> <p>We have reviewed the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025 and Appendix C: Proposed Main Modification MM81: Policy E3: Managing Flood Risk and in summary we are happy with the modifications listed below to the local plan.</p> <p>PS – please check the site allocation modification numbers in the Sustainability Appraisal of Modification (Post Examination Addendum – Main Modifications April 2025). They do not all appear to tally with the numbers of the main modifications for the allocations in the Spelthorne Local Plan – Schedule of Proposed Main Modifications - April 2025.</p> <p>We thank you for these modifications that are proposed to be made to the plan.</p>	
Attachments	
Attachment Name:	
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/manageViewRepresentation?repID=13022869&nextURL=%2FMMconsultation%2FmanagelistRepresentations%3FagentUID%3D%26objectorUID%3D%26byUID%3D%26byCommonName%3D%26docid%3D15918452%26repID%3D%26partId%3D15933364%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D%2D%26hasAttachments%3D%26useElastic%3D%26pageAction%3DF%26ca%5Fdraft%5Fofficer%5Fresponse%3D%26ca%5Fhowrepmade%3D%26ca%5Fassigned%5Fofficer%3D%26sort%3DsubmitDate%26dir%3Dasc%26startRow%3D1	

Representations Received in Response to Main Modifications Consultation (in MM number order)