

Representations Received in Response to the Local Plan Main Modifications Consultation regarding Sustainability Appraisal, Atlas of Change and Habitats Regulations Assessment



Spelthorne Takes Shape

June 2025

Policy / Evidence Base / Part of Plan: Sustainability Appraisal, Atlas of Change, Habitats Regulations Assessment
Respondent: Mr Peter Sainsbury (33669441)
Organisation:
Response ID: #1257309
Question 1: Please provide any comments on the Sustainability Appraisal as proposed to be modified below (which can be viewed under 'Consultation Documents' or via this link) here.
Leave Surrey as it is with the 11 District / Borough Councils
Question 2: Please provide any comments on the Atlas of Change (which can be viewed under 'Consultation Documents' or via this link) here.
Leave Surrey as it is with the 11 District / Borough Councils
Question 3: Please provide any comments on the Habitats Regulations Assessment Stage 2 Appropriate Assessment 2022 (CD007) (which can be viewed under 'Consultation Documents' or via this link) here.
Leave Surrey as it is with the 11 District / Borough Councils
Link to comment: https://spelthorne.inconsult.uk/MMconsultation/showUserAnswers?qid=10097379&voteID=1257309&nextURL=%2FMMconsultation%2FquestionnaireVotes%3Fqid%3D10097379%26status%3Dcomplete%26sort%3Drespondent%5F%5FcommonName%26dir%3Dasc%26showNum%3D10%26startRow%3D1%26search%3D

Policy / Evidence Base / Part of Plan: Sustainability Appraisal, Atlas of Change, Habitats Regulations Assessment
Respondent: Spelthorne BC Councillor (Cllr Michele Gibson) (19774369)
Organisation:
Response ID: #1262124
Question 1: Please provide any comments on the Sustainability Appraisal as proposed to be modified below (which can be viewed under 'Consultation Documents' or via this link) here.
<p>The page numbers in the contents and the body of the document do not match which is frustrating.</p> <p>Section 3 Health & Well Being - 1/ There is mention of noise issues related to Heathrow expansion but no mention of the related air pollution which is a major omission.</p> <p>Section 3.101 Page 55 Cultural Heritage and Historic Environment Section:</p> <p>"No issues with cultural heritage have been identified. Current listed buildings and structures, as well as their settings, will require protection from the impacts of future development".</p> <p>This is untrue. The Grade 2 Listed building, Staines Old Fire Station is in danger of collapse and deterioration due to being left by the owner of the land deliberately because he wants to develop the land without being impeded and said it himself. The Council has done nothing about this. There is no mention of the role of the Museum in relation to Cultural Heritage and Historic Environment. Also, the Old Town Hall was left to development of flats. This could have been avoided.</p>
Question 2: Please provide any comments on the Atlas of Change (which can be viewed under 'Consultation Documents' or via this link) here.
<p>Spelthorne Local Plan – Atlas of proposed changes to policies map – 26 March 2025</p> <p>Page 5/ PM003 mentions removal of related sites to ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development. There is no explanation of or detail related to what the "identified requirements for sustainable development" might be and no link to further information.</p>
Question 3: Please provide any comments on the Habitats Regulations Assessment Stage 2 Appropriate Assessment 2022 (CD007) (which can be viewed under 'Consultation Documents' or via this link) here.
<p>No Glossary and acronyms/letters are frequent without sufficient upfront explanation of what they are i.e. SPA Special Protection Area is not explained in a glossary.</p> <p>The mention of South West London was puzzling seeing as Staines is in Surrey. See below.</p> <p>5.2 THE SOUTH WEST LONDON WATER BODIES SPA AND RAMSAR SITE - TALL BUILDINGS AND CONSTRUCTION</p> <p>5.2.1. This section considers the potential adverse effects on integrity of the South West London Water bodies SPA and Ramsar site from the construction of tall buildings in close proximity as a result of Local Plan policies.</p>

There was no mention of the SSSI sites at risk from development and density, i.e. In 8.8 page 49 of the Authority Monitoring Report 2024 written by the council mentions:

“The Staines Moor Site of Special Scientific Interest (SSSI) is the largest in the Borough and includes the King George VI and Staines Reservoirs, Shortwood Common and Staines Moor itself. It is important not only for the plant species associated with the Moor but also for the nationally important populations of wintering wildfowl which use the reservoirs.”

But there is no such mention in the Local Plan “Habitats Regulations Assessment - Stage 2 Appropriate Assessment”. Which was puzzling.

Appendix F, FINDINGS OF STAGE 1 SCREENING, Page 5 (my page numbers there are no page numbers on Appendix F, - mentions “The Staines Development Framework” which no longer exists as a relevant document.

Because this Consultation is focused on Main Modifications only it is not holistic and does not capture all the issues in relation to much else of the Borough.

The merit and value of this Consultation is questionable based on the stringent focus on the Main Modifications and the HRA is questionable because of the cross references to areas elsewhere and outside of Spelthorne that do not seem to correlate.

Link to comment:

<https://spelthorne.inconsult.uk/MMconsultation/showUserAnswers?qid=10097379&voteID=1262124&nextURL=%2FMMconsultation%2FquestionnaireVotes%3Fqid%3D10097379%26status%3Dcomplete%26sort%3Drespondent%5F%5FcommonName%26dir%3Dasc%26showNum%3D10%26startRow%3D1%26search%3D>