

**SPELTHORNE CORE STRATEGY AND POLICIES DPD**

**SUBMISSION DOCUMENT**

**APRIL 2007**

**Summary of Representations made to  
Consultation held from 14 June – 2 August 2007  
and the Council's response**

**July 2008**





## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Highways Agency	All		SUPP	The level of traffic assessment within the Transport Statement is sufficient evaluation of the impact of development proposals on the strategic road network. From the point of view of the strategic road network there are no "showstoppers".	Noted.
Kempton Residents Association	All		OBJ	More attention should be given to the environment and community infrastructure.	This is already addressed in Chapters 10 and 11.
RSPB	All		OBJ	The DPD is supported by an Appropriate Assessment that does not comply with national planning policy and the Habitats Directive in that it does not consider in-combination effects of the plan with other plans and projects.	Disagree – the Appropriate Assessment considered “in combination” effects at Section 4 and drew conclusions at Section 7 that there were no significant effects of the DPDs individually or in combination with other plans and projects. The assessment has been agreed by Natural England.
Mr Stanley Talbot	All		OBJ	Lack of adequate public consultation on the documents.	Consultation has met the requirements of the Council's Statement of Community Involvement.
Mr William Fraser	All		OBJ	'Has not had sufficient time to digest the information'. Wishes to make representation on the lack of adequate consultation with the community.	
Mrs Caroline Nichols	All		OBJ	Lack of adequate community involvement	
Mrs Caroline Nichols	All		OBJ	Factual statements need more cross referencing to source documents.	Cross referencing to the Council's evidence base and other relevant documents considered adequate.
Surrey County Council	All		SUPP	Generally support the approach and policies and consider the document sound.	Noted.
Sunbury Common Residents Association (SCORA)	All		OBJ	The document was not approved by the Council in accordance with its Standing Orders.	The Council is satisfied it was.
Sunbury Common Residents Association (SCORA)	All		OBJ	Concern about the additional amount of traffic crossing Walton Bridge if improvements are made to the Walton side. Issue not considered by the Plan. No specific change proposed.	This is an issue for Surrey County Council to consider as part of their proposals for the new Walton Bridge and more generally as part of their Local Transport Plan.

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Sunbury Common Residents Association (SCORA)	All		OBJ	Plan does not make long term provision for congestion at Staines Bridge.  No specific change proposed.	Generally the plan promotes: alternatives to car travel through Policy CC2; Staines role as a public transport interchange through Policy SP7; requiring site specific travel plans through Policy CC2; and controls on the amount of parking through Policy CC3. It is also an issue for the County Council's Local Transport Plan but Policy TC1 (b) recognises the need for measures to improve traffic management.
Lower Sunbury Residents Association	All		OBJ	Lack of adequate public consultation on the preparation of the plans.	Consultation has met the requirements of the Council's Statement of Community Involvement.
Savills Incorporating Hephher Dixon	All		OBJ	The strategy should include a limited review of the Green Belt, taking into account the possible implications of further growth at Heathrow beyond Terminal 5. A review of the Green Belt in the Stanwell area has been proposed in support of the submission.	Development needs can be met from the urban area and the Government has not made the final decision on possible further growth at Heathrow. Green Belt should only be altered in exceptional circumstances and these do not exist.
SEERA	All		SUPP	The submitted DPD is in general conformity with the adopted Regional Spatial Strategy (RPG9 as amended) and the emerging Regional Spatial Strategy (the draft South East Plan as submitted to the Government). Additional comments are intended to improve the documents but do not relate to the issue of general conformity or conflict with the opinion of general conformity.	Noted.
Shepperton Residents Association	All		OBJ	Lack of adequate public consultation.	Consultation has met the requirements of the Council's Statement of Community Involvement.
Shepperton Residents Association	All		OBJ	There should be a mechanism by which the plan is reviewed every 5 years so as to respond to changing circumstances.	Council's are required to keep plans under continuous review via their Annual Monitoring Reports and review them as necessary; therefore no change to the text is needed.
Staines Town Society	All		OBJ	Many of the policies in the previous Local Plan have been omitted from the Core Strategy: 1. Rural environment - landscape, water features, nature conservation and trees. 2. Built Environment - lighting, privacy, residential development, shop fronts and shutters, street furniture, traffic and pylons. 3. Aviation - impacts of aviation and helicopters.	Whilst the number of policies is significantly reduced all relevant issues have been covered by more generic policies.

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Europa Business Consultancy Ltd	All		OBJ	A fundamental change of strategy is required to provide for housing and employment. The strategy should avoid sites at risk from flooding and in current employment use and should include a review of the Green Belt instead.	Housing and employment needs can be met without unacceptable flood risks or using the Green Belt and maintain employment provision overall.
Green Street Action Group	All		OBJ	Inadequate public consultation.	Consultation has met the requirements of the Council's Statement of Community Involvement.
Fairview New Homes Ltd	All		OBJ	The Core Strategy in its vision is no more than an extension of the Adopted Local Plan. It generally fails to take a wider perspective e.g. having proper regard to the evidence base for housing, achieving affordable housing provision beyond conventional methods, has no policy setting out how employment skills are to be improved and has no coherent economic strategy that sets out to maintain a sound economic base for the Borough.	All appropriate means of securing affordable housing are set out in Policy HO3. Para 2.16 explains that the Community Plan deals with the issue of training, and Para 2.20 notes the improvement to 16-19 year old education that are being progressed and supported through the planning process.
Government Office For The South East	All		OBJ	Reservations whether as drafted the document is sufficiently spatial to satisfy Test 4.	An amendment to Chapter 4 using material already in the plan has been prepared as a proposed alteration and which it is considered appropriately expresses the spatial nature of the Plan.
Fairview New Homes Ltd	All		OBJ	Many policies are too generalised and lack local distinctiveness.	Disagree.
Councillor Ian Beardsmore	All		OBJ	The approval of the document was not in accordance with Council Standing Orders. The Member level LDF Working Party was not open to the public and the LDF did not go through the Council's scrutiny process. Some of the evidence base was not published until the DPD was submitted. The adoption process was not consistent with guidance on stakeholder involvement in PPS12.	The Council's decisions have been in accordance with its Standing Orders. Only the Committees of the Council are public – the LDF Working Party is not a constituted committee. Scope to refer matters to a Scrutiny Committee only apply to resolutions of a Council Committee and not recommendations to Full Council. Some of the evidence base responded to more recent government guidance and was only finalised just prior to submission. The DPD has yet to be adopted but all consultation has followed the Council's Statement of Community Involvement.
Councillor Ian Beardsmore	All		OBJ	No policy to deal with cumulative impact of development.	Disagree – see Policies CO3 (Open Space), SP5 (Community Needs) and CC2 d (iii) (Traffic).
Cllr Colin Strong	All		OBJ	The Core Strategy and Policies DPD was not prepared in accordance with the SCI, in particular there was no opportunity to comment on the Transport Statement and SFRA.	There was no requirement to consult on the evidence base supporting the plan. Consultation has met the requirements of the Council's Statement of Community Involvement.

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Respondent	Part No	Policy	Type	Summary of Representation	Response
Cllr Colin Strong	All		OBJ	<p>Complete absence of any reference to Minerals and Waste in the plan.</p> <p>Plan should include a policy that new mineral sites in Spelthorne must be phased so a new one is not allowed until the old one is closed down and restoration complete.</p>	<p>Para 2.22 explains that the Minerals and Waste matters are the responsibility of Surrey County Council and subject to a separate LDF.</p> <p>Issue of phasing sites is an issue for the Minerals DPD.</p>
Camberly Park Holdings Ltd	All		SUPP	I believe the DPD to be sound and therefore I give my support.	Noted.
Green Street Action Group	All		OBJ	Plan not sustainable when compared to the requirements of PPS1.	Disagree.
Natural England	All		SUPP	The Core strategy is sound.	Noted.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

CHAPTER 1 INTRODUCTION					
Respondent	Part No	Policy	Type	Summary of Representation	Response
Green Street Action Group	1.5, 1.6		OBJ	All relevant background documents should be listed in an appendix and cross referenced to the relevant part of the document.	It is not essential to list all the backgrounds documents – the existing cross referencing is considered adequate.
CHAPTER 2 A SPATIAL DESCRIPTION OF SPELTHORNE					
Green Street Action Group	2.2		OBJ	Adjoining authorities should be identified on Map 1. Comment should be made on the limited crossing points over the River Thames and primary route network through the Borough.	The primary roads are shown on Map 1. However, it is not considered essential to show the other information which is set out in background documents, e.g. Annual Monitoring Report 2006, page 3.
Green Street Action Group	2.4		OBJ	Should make a distinction in the text between Green Belt land and Green Belt covered by water.	Disagree – in policy terms there is no distinction.
Green Street Action Group	2.5		OBJ	Should refer to floods in 2003, lack of surface water drainage pipes and cross refer to flood risk data.	This level of detail is more appropriate to the SFRA which provides detailed information on flooding.
Mrs Caroline Nichols	2.7		OBJ	Need also to refer to PM3s in Para 2.7.	NO <sub>2</sub> and PM <sub>10</sub> are referred to as they are the main pollutants/indicators which were required to be monitored at the time the DPD was being prepared.
Green Street Action Group	2.7		OBJ	No reference to: PM <sub>2.5</sub> micro-particles which are increasing, changing of flight paths from Heathrow, Heathrow's expansion, the impact of the Colnbrook incinerator on air pollution, and increase in road transport activities.	The Core Strategy itself is not the appropriate place to set out such detailed background information.
Green Street Action Group	2.8		OBJ	No mention of noise from M3 through Sunbury and Shepperton, or other parts of the Borough due to aircraft.	Heathrow is referred to specifically because the scale of the noise impact on the Borough is particularly significant. Main roads through the Borough are also a source of noise.
Green Street Action Group	2.9		OBJ	No mention of recent pattern of housing schemes below the affordable housing threshold, or schemes built at the expense of green garden space and loss of desirable housing stock. Also there has been a loss of existing infrastructure including petrol stations and public houses.	Such matters are too detailed for inclusion in this document – much of the information is in background documents. It is government policy through PPS 3 to encourage the efficient use of land. There is no evidence of a net loss of capacity in petrol retailing or A3/A4 uses.
Green Street Action Group	2.10		OBJ	Fails to explain that most planning applications are to increase the number of rooms in existing houses.	Reference generally to the impact of residential extensions is given at paras 5.16-5.26 and para 6.23 of the Housing Market Assessment.

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Respondent	Part No	Policy	Type	Summary of Representation	Response
Green Street Action Group	2.13		OBJ	Fails to make clear the surplus of office space.	Relatively short term issue relating to slack office market post-9/11 but now beginning to pick up – information provided in Annual Monitoring Reports.
Green Street Action Group	2.15		OBJ	No mention on the effect of Tesco, Sunbury or Kempton Open Air Market, Sunbury - which have a wide catchment area outside the Borough and a major traffic impact.	Detailed information on retailing is set out in the 2004 Retail Study and the 2007 Update.
Spelthorne Constituency Labour Party	2.17		OBJ	Do not feel the needs of the projected growth in the number of elderly have been taken account of. There needs to be an increase in the provision of elderly services.	Disagree. Borough Council recently reviewed its elderly services to take account of this. Policy HO4 makes specific reference to need for extra care sheltered accommodation. Other agencies have not identified any other development related needs.
Green Street Action Group	2.17		OBJ	View from service providers on infrastructure needs contradicted by anecdotal evidence.	Service providers have provided objective guidance.
Surrey County Council	2.17-2.20		SUPP	Support the commentary in respect of the County Council's schools. General reference should also be made to "extra care provision for the elderly".	Noted. Extra care provision referred to at Para 2.10 and Policy HO4.
Green Street Action Group	2.19		OBJ	Spatial strategy of reducing health services in the Borough is unsound.	The Plan's strategy is to ensure all community needs are met – see Policy SP5 and CO1. Responsibility for health services are delivered by the relevant hospital trusts now the Primary Care Trust.
Natural England	2.21		SUPP	Supports the paragraph.	Noted.
Green Street Action Group	2.21		OBJ	Should refer to DEFRA's designation of the River Thames in 1994 as a UK sensitive area regarding water quality.	Already locally designated as a Site of Nature Conservation Importance, the further information is not essential for this DPD.
Mrs Caroline Nichols	2.22		OBJ	Plan should refer to the Surrey Waste and Minerals Plan and specifically the intended future role of the Charlton Lane Transfer site and traffic impact of further development.	Para 2.22 acknowledges Minerals and Waste are subject to a separate LDF prepared by the County Council. Not for this Plan to cover issues addressed in the Surrey Waste Plan.
Stanwell Liberal Democrats	2.22		OBJ	Wants a specific policy on gravel extraction to protect the residents of Stanwell, Stanwell Moor and Spelthorne as a whole from its impact.	This is a matter for the County Council's forthcoming Minerals Plan.
Surrey County Council	2.22		SUPP	Supports the reference to the County Council's role as Minerals and Waste Authority.	Noted.
Councillor Ian Beardsmore	2.22		OBJ	Need a policy in the plan to deal with the associated highway and environmental impact of current or proposed minerals and waste developments.	It is for the County's Minerals and Waste Plan to deal with the associated traffic issues.

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Respondent	Part No	Policy	Type	Summary of Representation	Response
Green Street Action Group	2.22		OBJ	Paragraph seen as an "opt out" because mineral workings have a major spatial influence on the Borough.	Minerals are a matter for the County Council's forthcoming Minerals Plan.
Natural England	2.27		SUPP	Supports the paragraph.	Noted.
Green Street Action Group	2.28		OBJ	Should refer to shrinking services at Ashford Hospital and impact on employment.	Management of hospital services between the Ashford and Chertsey (St Peter's) sites is for the Ashford and St Peter's Hospital Trust.
Green Street Action Group	2.31		OBJ	No mention of surplus office space in Sunbury.	Relatively short term issue. Information provided in Annual Monitoring Report. Vacant space is nevertheless part of the areas business capacity and potential for further employment within existing floorspace.
Green Street Action Group	2.35		OBJ	Number of additional "particular" issues which have been overlooked, including: deteriorating quality of life, inadequate infrastructure, on-street parking problems, impact of expanding Heathrow Airport, and loss of marketable housing to intensive development.	The purpose of the list in Para 2.35 is to indicate the more significant issues. The DPD includes policies to deal with a wide range of other matters.

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CHAPTER 3 VISION AND OBJECTIVES						
Respondent	Part No	Policy	Type	Summary of Representation	Response	
Sport England South East	3		OBJ	The vision and objectives do not fully reflect the role of the LDF in increasing participation levels in sport and active recreation to address causes of ill health and inactivity and thereby help develop and shape healthy and sustainable communities. Objective 5 should be amended to reflect this requirement. As drafted the core strategy is unsound in relation to conformity with the draft South East Plan, specifically Policies S3 "Supporting Healthy Communities" and S7 "Cultural and Sporting Activity".	Disagree. Para 10.22 of the Plan acknowledges the importance of open space, sport and recreation as part of people's wellbeing and sets out Sport England's target to increase participation by 2020. This underpins Policy EN4 on the provision and maintenance of open space, sports and recreation facilities and the purpose of Objective 5. The Plan appropriately reflects the guidance of the draft South East Plan. The LDF does not, however, seek to duplicate the role of the Council's Leisure Strategy which has initiatives on improving participation.	
Green Street Action Group	3		OBJ	Need to concentrate on issues within the Borough's control and minimise further deterioration to the environment - referring to points made re Chapter 2.	The DPD seeks to do this.	
Surrey County Council	3		SUPP	Supports the vision and objectives	Noted.	
Spelthorne Constituency Labour Party	3.2		SUPP	We recognise the careful consideration and the extent of work which has been undertaken in the preparation of this document, and are supportive of the stated vision in paragraph 3.2.	Noted.	
Staines Town Society	3.2		OBJ	Vision to be amended to have a presumption against major traffic generating commercial development.	Disagree. Plan appropriately seeks to ensure development with potential for a lot of traffic is at locations where non-car based travel can be promoted.	
CPRE Surrey	3.2		SUPP	Supports the vision especially the references to sustainability, housing and confining further development to the urban area.	Noted.	
Brixton PLC	3.2		SUPP	Supports the principles contained in the vision. Recommends an additional paragraph be added: "The Core Strategy seeks to maximise opportunities to regenerate existing urban sites that are particularly suited to the provision of sustainable development, for example, sites that are relatively under-utilised, close to infrastructure and services and which are capable of delivering wider benefits such as environmental improvements".	More appropriately dealt with in Objective 10 and Policy SP1 in particular as drafted.	

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Respondent	Part No	Policy	Type	Summary of Representation	Response
CPRE Surrey	3.3		SUPP	Supports the objectives especially, 1, 4, 5, 7, 9, 16, 17 and 18.	Noted
Staines Town Society	3.3		OBJ	Objectives 1 to 4 should be cross-referenced to all sections of the plan and not just Chapter 10 on the environment	They are most relevant to the subject matter of Chapter 10.
Spelthorne Constituency Labour Party	3.3		SUPP	We recognise the careful consideration and the extent of work which has been undertaken in the preparation of this document, and are supportive of the stated objectives in paragraph 3.3.	Noted.
Government Office For The South East	3.3		OBJ	Difficult to distinguish plan objectives from sustainability objectives	Disagree. There will inevitably be a close relationship as the plan is intended to deliver sustainable development. The objectives are, however, appropriately focussed on 'delivery' whereas the sustainability focuses on overall outcomes.
Brixton PLC	3.3		SUPP	Supports objectives 1, 10, 13, 16, 17, 18 and 19.	Noted.
Brixton PLC	3.3		OBJ	Comment on objective 6 that housing should be maximised where it meets sustainable development objectives and not resisted because housing targets have been met.	The objective does not seek to 'limit' provision and Policy SP2 as drafted refers to providing 'at least' an average of 151 dwellings per annum.

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CHAPTER 4 CORE STRATEGY AND POLICIES					
Respondent	Part No	Policy	Type	Summary of Representation	Response
Surrey County Council	4		SUPP	Supports the general approach to Government policy, the Structure Plan and emerging SE Plan.	Noted.
Green Street Action Group	4.3		OBJ	Need strategic policies on: a) Gravel working, landfill and restoration. b) Waste disposal and recycling facilities. c) Infrastructure.	Minerals and Waste issues are for the County Council's LDF documents. Infrastructure is dealt with in strategic policy SP5 and detailed policies CO1 and CO2.
Green Street Action Group	Key Diag		OBJ	The Key Diagram should identify the urban area and different road types in the Key. It should also be up-dated to reflect the SFRA. Text should explain the map's purpose.	The Key Diagram can be factually amended to show that areas shaded yellow are the urban area. Roads are shown in conventional colouring and labelled so need no further explanation. The flood area can be factually amended to show the SFRA 1:100 outline as shown in detail on the Submission Proposals Map

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CHAPTER 5 THE GENERAL LOCATION OF DEVELOPMENT					
Respondent	Part No	Policy	Type	Summary of Representation	Response
Brixton PLC	5.1-5.4		SUPP	Support statements in these paragraphs about locating development in existing urban areas, making effective use of land, avoiding unacceptable flood risk and re-using poorly located employment land for housing.	Noted.
Persimmon Homes	5.3		OBJ	The strategy of not reviewing the Green belt boundary is seriously flawed and unsound. There is a need to release land from the Green Belt.	No need to release land from Green Belt to meet development needs. Therefore the exceptional circumstances necessary to justify Green Belt release do not exist.
Persimmon Homes	5.4		OBJ	Release of Green Belt land is necessary to meet housing provision targets.	Disagree. See Housing Trajectory and Housing Land Availability Assessment, and its update (July 1008).
Green Street Action Group	5.7		OBJ	Failure to safeguard industrial sites and allowing housing results in traffic problems of on-street parking. Warehousing should be located near the primary road network. Shopping centres should have affordable parking.	No evidence of claimed parking problems arising from redeveloping industrial sites. All designated employment sites are located near, or with good access to, the primary road network or main roads.
Fairview New Homes Ltd		SP1	OBJ	The Core Strategy lacks transparency in the manner in which employment sites have been allocated for housing. There is no apparent assessment of the commercial efficacy of the employment sites chosen for housing development.	Explanation given in the Economy and Employment Land Study – May 2006.
Home Builders Federation (HBF)		SP1	OBJ	More land needs to be identified for housing if the Borough is to meet its housing requirement without relying on windfalls. This will require changes to the Green belt boundary.	Disagree that more land needs to be identified to meet housing requirements. There is a robust case to place some reliance on windfalls.
Mr Alan Weston		SP1	OBJ	Support the principle of protecting the Green Belt and avoiding areas liable to flood but a stronger policy is needed to rule out more housing in Flood Zone 2 for which there is no need as the proposed and windfall sites will more than meet total requirements. A rider should be added: "No new housing development in a newly built form will be permitted in Flood Zone 2, unless the Annual Monitoring Report identifies a need to change the policy to meet housing allocation targets".	Some housing in Zone 2 is required and this is explained and justified in the SFRA Part 2 and paras 5.11-5.22 of the DPD.

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Respondent	Part No	Policy	Type	Summary of Representation	Response
Mr Terence Tilby		SP1	OBJ	The locational strategy should be amended to include a review of Green Belt land and promote changes to provide for a more sustainable pattern of development. The Green Belt should not act as a barrier to sustainable development and inner boundaries should be reviewed recognising the need to accommodate development and the desire to appraise Green Belt sites against sustainability criteria.	The Metropolitan Green Belt has a vital sustainability role in restraining the outward spread of London. There is no exceptional case to justify releasing land which contributes to this important role. Development needs can be met from within the existing urban area.
Network Rail		SP1	OBJ	Object on the grounds that the policy should allow for a review of detailed Green belt boundaries.	A review is not required – see previous comments.
Staines Town Society		SP1	OBJ	The wording of the Preferred Options Policy CS1 relating to Green Belt should be retained. The last paragraph of the policy should be amended to read "Major traffic generating development will only be permitted if residential and will be located where it is accessible by a choice of modes of transport".	The policy has been intentionally drafted so as not to repeat what is in the 'saved' Local Plan Green Belt Policy GB1. Limiting 'major' development to residential only would not ensure that the employment capacity and economy were appropriately maintained.
Rugby Estates PLC		SP1	SUPP	Supports the principle of the policy, particularly the reference to redevelopment of poorly sited employment uses.	Noted.
Fairview New Homes Ltd		SP1	OBJ	In view of minimal allocations, the Core Strategy lacks transparency and fails to provide any evidence that all green belt land was evaluated to see whether it still performed a green belt function, and if not why it was discounted for development.	No need to evaluate function. PPG 2 requires that existing Green Belt boundaries should not be changed unless exceptional circumstances exist which necessitate such revision. No policies in the draft South East Plan or Surrey Structure Plan justify need to re-examine boundaries where development needs can otherwise be met in the urban area.
Persimmon Homes		SP1	OBJ	Believes the Council will be unable to meet its annual housing provision within the existing urban area. Amend first sentence to read: "New development will take place within the existing urban area, allocated development sites in the Site Allocations DPD and on site where development is exceptionally allowed to meet need".	Council can meet its requirements, and the suggested amendments are not required.
Fairview New Homes Ltd		SP1	OBJ	The sentence dealing with redevelopment for housing of poorly sited employment uses in residential areas should be replaced with: "Surplus employment land and poorly sited employment uses will be redeveloped for housing".	The strategy is to redevelop poorly sited employment land in residential areas for housing. Employment land that is not poorly sited is retained under the strategy in employment use to support the local economy.
Fairview New Homes Ltd		SP1	OBJ	There is inconsistency between the Core Strategy policies that seek to reduce flooding and its effects and the Allocations DPD that allocates sites liable to flooding.	Two allocation sites with potential flood risk have been subject to Flood Risk Assessments which demonstrate they can be developed without unacceptable risk in accordance with Policy LO2.

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Crane Road Properties		SP1	OBJ	An extra sentence should be added: "Outside of existing urban areas, the Green Belt will be maintained, predominantly following existing boundaries with amendments proposed to meet development requirements in sustainable locations, as outlined in the Allocations DPD".	There is no justification to alter the Green Belt boundary. The suggested wording is inappropriate.
CPRE Surrey		SP1	SUPP	Supports the thrust of the policy in maintaining the extent of the urban area and providing for new development within it.	Noted.
CEMEX		SP1	OBJ	A clause should be included in the policy to allow for reviews of Green Belt boundaries in the future.	No justification for such a change – see previous comments on suggested Green Belt alterations.
Brixton PLC		SP1	SUPP	Brixton PLC support the general principle of locating all new development within the existing urban areas and making the best use of poorly located employment sites. Outside urban areas, other than in exceptional circumstances, development should be resisted.	Noted.
Ashford Sports Club		SP1	OBJ	An extra sentence should be added: "Outside of existing urban areas, the Green Belt will be maintained, predominantly following existing boundaries with amendments proposed to meet development requirements in sustainable locations, as outlined in the Allocations DPD".	There is no justification to alter the Green Belt boundary. The suggested wording is inappropriate.
Lower Sunbury Residents Association		SP1	OBJ	Council proposing to build too many houses.	Disagree.
Fairview New Homes Ltd		SP1	OBJ	The Core Strategy lacks transparency and is inconsistent in the manner in which alternative sites other than those liable to flooding were evaluated and subsequently discounted. Confusingly the Council cite flooding as a reason for discounting sites promoted for allocation.	The Council's SFRA provides detailed background on flood issues and the Housing Land Availability Study provides information on potential housing sites.
The Pinewood Studios Group		SP1	OBJ	(Whilst the objection was directed to 'saved' Local Plan Policy GB1 it has been taken as if made to SP1). Consideration should be given for a review of Green Belt sites to identify those appropriate for release for development, and for commitment to improve land use management and access to the Green Belt in partnership with stakeholders.	The Council is satisfied it can meet its development needs without using Green Belt land. The issue of Green Belt management is already dealt with in Policy EN8(b).
Rugby Estates PLC	5.15-5.16		SUPP	Supports the approach recognising the opportunity presented by development to help manage and reduce flood risk.	Noted.

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Respondent	Part No	Policy	Type	Summary of Representation	Response
Brixton PLC	5.16		SUPP	Brixton PLC supports the acknowledgement that the redevelopment of existing brownfield sites can contribute to a reduction in flood risk/impact.	Noted.
Government Office For The South East		LO2	OBJ	Appears to add nothing to national policy.	The SFRA provides detailed background to this locally specific policy which adds considerably to the general guidance in national policy.
Shepperton Residents Association		LO2	OBJ	Want a prohibition on extensions to residential property in the floodplain and new residential development on large gardens.	Extensions are prohibited in the 1:20 flood risk area (Zone 3b) and any new housing is prohibited in the 1:100 flood risk area (Zone 3a).
The Pinewood Studios Group		LO2	OBJ	The policy should be amended to give greater flexibility by including provision for mitigation measures in new development. Suggests amending clause (c) to add: "unless appropriate mitigation measures are included as part of the development" and amending clause (e) to add: "unless development and uses are specifically designed to be resilient/resistant to flood risk and include appropriate mitigation measures".	Re: point (c): the existing wording takes account of the impact of the development as a whole including any mitigation. Re: point (e): already qualified by reference to 'where flood risks can be overcome'.
The Pinewood Studios Group		LO2	OBJ	The flood boundaries shown on the Proposals Map in the vicinity of Shepperton Studios should be amended to reflect the revised 1 in 100 year flood area produced for the detailed Flood Risk Assessment, which was carried out for the studios and agreed by the Environment Agency in 2004.	What was agreed with the EA in 2004 has been superseded by the SFRA work undertaken in 2006 using the latest EA data and now in the latest flood outlines produced by the EA in 2008.
Thames Water		LO2	OBJ	There should be specific reference to sewer flooding in the sub text to LO2.	The SFRA considers sewer flooding. This risk does not limit potential development.
Surrey County Council		LO2	SUPP	Supports the policy with its emphasis on control and mitigation of flood risk and the high degree of compliance with Government policy. Particularly support the detailed approach to run-off attenuation in urban areas in part (f).	Noted.
Stanwell Liberal Democrats		LO2	OBJ	Policy should include requirement for developer contributions to improve soakaways on roads in Stanwell subject to surface water flooding.	The County Council, who are responsible for highway soakaways, have not identified any required upgrading of the soakaway system.

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Respondent	Part No	Policy	Type	Summary of Representation	Response
Staines Town Society		LO2	OBJ	Supporting text should include the flood risk vulnerability classification table from the Preferred Options document. In sub-point (e) of the Policy add a comma after "Zone 3a" so reference to flood risk being overcome only relates to Zone 2. Amend paragraphs 5.6 and 5.16 accordingly.  Policy should also control small losses of permeable ground, e.g. by paving over front gardens.	Flood risk vulnerability classification is set out in the SFRA. Suggested amendment to point (e) would alter the intention of allowing development where the risk can be overcome. There are no planning controls on paving over front gardens, therefore the suggested addition, though worthy, could not be implemented.
Brixton PLC		LO2	SUPP	Brixton PLC supports the approach to reducing flood risk and its effects on people and property. In particular we believe that the Core Strategy and Development Policies must make it clear that the sequential approach to site development advocated in PPS25 is applied to site allocations and associated policy, i.e. that sites within Zone 2 will be promoted ahead of those within Zone 3.	General support noted. However, the SFRA has demonstrated that some types of development will need to be allowed in Flood Zone 3.
Mr Alan Weston		LO2	OBJ	The policy should be strengthened with a presumption against housing in Flood Zone 2.	The Borough can only meet its housing requirements by use of land in Flood Zone 2 as well – this is not precluded by PPS 25.
Green Street Action Group		LO2	OBJ	Questions the adequacy of the SFRA in relation to: a) ability to cope with flash floods. b) cumulative impact of development. c) risk from water supply pipes. d) risk from reservoirs. e) effect of gravel extraction. f) uncertain effects of surface water flow. g) uncertain effects of ground water flow. Policy should prohibit underground car parks, make provision for trees, stop gravel extraction, deal with emergency planning, minimise extensions and build system of storm sewers.	No evidence presented to substantiate the criticism of the SFRA. No flood related reasons to prohibit underground car parks. Extensions are controlled in areas of highest risk. Gravel extraction is an issue for the Minerals LDF. Emergency planning issues are addressed in the Council's Emergency Plan. Storm sewers are inappropriate as the most sustainable way of handling storm water in Spelthorne is soakaways into the underlying ground which help to reduce 'surges' of water into the river system.
Fairview New Homes Ltd		LO2	OBJ	Objects to housing being strongly resisted in areas of high flood risk. The policy should state that proposals will be assessed on a site by site basis. Clause (e) should be amended to state: "Whilst it is accepted that Zones 3a and 2 could be vulnerable to housing, a flood risk assessment could be undertaken to demonstrate that suitable mitigation could be implemented to prevent the risk of flooding".	The Council's policy reflects a sound strategic approach to flood risk and flood reduction and the controls are a necessary and appropriate response.
Environment Agency		LO2	SUPP	Supports the policy. It is very robust and comprehensive and takes account of all of our flood risk concerns.	Noted.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Mr Stanley Talbot		LO2	OBJ	Ditches and rivers have not been "maintained" and restrict flow which adds to flood risk. Problem of storm water not addressed.	Agree ditches and rivers need to be continually maintained by the relevant owners and authorities, but this is not an issue the LDF can assist on but rather dealt with through the Council's/EA statutory powers. Storm water has been considered in the SFRA but there is no realistic way of coping with extreme weather events and the short term surface water flooding that can arise.
Kempton Residents Association		LO2	OBJ	Flooding is a constant problem in Sunbury. Too much concreting etc. is contributing to flooding.	Flooding has been considered in the SFRA, and Policy LO2 reflects its findings.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

CHAPTER 6 HOUSING PROVISION					
Respondent	Part No	Policy	Type	Summary of Representation	Response
CEMEX	6		OBJ	A rural exceptions policy should be added with the following wording: "Exceptionally, and where clearly justified by local needs, this policy will allow the development of a strictly limited number of suitable very small sites within or adjoining Green Belt settlements, for affordable housing only as "rural exception sites". This policy would only provide for those who are current residents of, or who have a close family connection with such settlements/villages. Such sites will only be released for affordable housing in perpetuity".	Housing requirements can be met from the urban area and there are also other non-development mechanisms to deal with the requirement of those in housing need – see Para 5.5 of the Housing Market Assessment. There is no need to use Green Belt land to provide affordable housing.
Congregation of the Sisters Of Charity Of St Paul The Apostle	6.1		OBJ	Suggests a new objective providing for new housing in appropriate locations consistent with policies such as EN4.	The housing related objectives which are repeated at Para 6.1 already adequately make clear what the Council is seeking to deliver, and objective no. 5 identifies the need to safeguard valuable urban open space. No additions are needed.
Green Street Action Group	6.1		OBJ	Fails to take account of housing over-provision, demolition of good houses making area less desirable and encouraging people to move and building within 500 metres of primary road network. Inadequate study of infrastructure.	Disagree.
Green Street Action Group	6.2		OBJ	This paragraph is strongly challenged. Yet to be proved affordable housing cannot be provided in schemes of less than 10 dwellings. There are plenty of flats available to rent or purchase, there is a demand for the types of dwellings that are being demolished and offices could be converted to housing. Falling population means more housing is not required. Influx of people into the Borough will add to traffic problems. No analysis of need for care/nursing homes. All potential housing sites should be identified.	Despite a falling population more housing is required, including for the elderly – already explained at Para 2.10. Traffic impact assessed in Transport Statement, showing overall no growth in traffic from additional housing due to proportion of sites redeveloped for housing with uses having higher levels of traffic generation. Not possible to identify all housing sites that may come forward over the 20 year life of the plan.
Persimmon Homes	6.4		OBJ	Does not believe that the evidence base for the claim that the Council will meet its housing targets is robust or credible.	Disagree.
Green Street Action Group	6.4		OBJ	Over provision of housing means a moratorium is required until a cumulative impact study is undertaken.	There is a continuing need for housing and the emerging South East Plan requires continuing provision.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Home Builders Federation (HBF)	6.5		OBJ	The housing trajectory is unsound because of its reliance on windfalls contrary to PPS3. The housing land availability assessment does not meet the Government requirements for a strategic housing land availability assessment, partly due to lack of input from the house building industry and does not provide a robust and credible evidence base.	PPS 3 (para 59) allows reliance on windfalls where there is a robust case to do so, which there is. The Plan was published prior to publication of the Government's guidance in July 2007, but the Council's Housing Land Availability Assessment closely follows the draft guidance and the final guidance.
Surrey County Council	6.5		SUPP	Supports the reference to unallocated sites in table 2 as part of the policy approach to satisfying housing requirements.	Noted.
Fairview New Homes Ltd	6.5		OBJ	The Core Strategy fails to have regard to PPS3 para 59 that deals with windfalls. It relies too heavily of windfall provision and fails to robustly justify why Spelthorne should be an exception in this respect.	Disagree – PPS 3 allows reliance on windfalls where there is a robust case to do so, which there is. The Plan was published prior to publication of the Government's guidance in July 2007, but the Council's Housing Land Availability Assessment closely follows the draft guidance and the final guidance.
Persimmon Homes	6.5		OBJ	The figures in Table 2 are unsound because they do not accord with Government guidance on delivering a flexible supply of housing. The figure from the Site Allocations DPD is not achievable.	Disagree.
Persimmon Homes	6.6		OBJ	Contests the credibility and robustness of the figures.	Comments are unsubstantiated.
Green Street Action Group	6.8		OBJ	Affordable housing is the main issue, and requirement should be much higher than 40%. No requirement for market housing.	There is a need for both 'market' and 'affordable' housing. 40% is already challenging and its contribution to meeting needs will need to be monitored.
Surrey County Council		SP2	SUPP	Supports the policy.	Noted.
Kempton Residents Association		SP2	OBJ	Housing development is way ahead of target and must be curtailed. It is spoiling Sunbury, causing extra traffic and air pollution and should be prohibited in certain areas including back gardens, which are a major source of biodiversity.	Disagree.
Mr Alan Weston		SP2	OBJ	The figure of 151 dwellings per annum should be adjusted to take account of overprovision in relation to the previous Local Plan, believed to amount to over 600 dwellings to 2006.	Disagree. There is an ongoing housing need and the South East Plan housing requirements have to be met and provision prior to 2006 cannot be counted.
Mr John Carruthers		SP2	OBJ	The Council is already ahead of housing requirements and is proposing to exceed the South East Plan targets for the Borough.	Disagree. There is an ongoing housing need and the South East Plan housing requirements have to be met.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Mr Terence Tilby		SP2	OBJ	The housing requirements could increase through the South East Plan and the policy should be amended to include reference to any higher level of provision that may be required in the final version of the plan.	The Policy intentionally uses the word 'at least' so it would not be in conflict with a higher figure.
Persimmon Homes		SP2	OBJ	Contest the Council's figures and consider the Council will be unable to meet the provision.	Disagree.
SD Developments		SP2	OBJ	The housing requirements could increase through the South East Plan and the policy should be amended to include reference to any higher level of provision that may be required in the final version of the plan.	The Policy intentionally uses the word 'at least' so it would not be in conflict with a higher figure.
Home Builders Federation (HBF)		SP2	OBJ	Objects to the 40% affordable housing target.	This figure is already set in the Surrey Structure Plan and draft South East Plan for the London Fringe area, and is essential as a contribution to meeting housing needs in Spelthorne.
Sunbury Common Residents Association (SCORA)		SP2	OBJ	Failure to provide housing which the local population actually needs. Too many smaller units are proposed and too much low cost housing is planned.	Disagree. No evidence presented to demonstrate that those in need could afford more expensive housing. Council's position is based on its Housing Needs Assessment and Housing Market Assessment.
Rugby Estates PLC		SP2	SUPP	Supports the policy in principle but considers for clarity it should include the overall housing requirement and the plan period.	The total requirement of 3020 is already made clear in the supporting text.
A E Kendrick (Garages) Ltd		SP2	OBJ	The thresholds for affordable housing should be raised and the proportion of affordable housing provided retained at the level specified in the adopted plan or indeed lowered. In addition exception sites should be permitted within the Green Belt.	The thresholds have been selected to ensure delivery of 40% of all housing needing to be affordable and with due account of the viability of developments. No justification for permitting affordable housing in the Green Belt.
Congregation Of the Sisters Of Charity Of St Paul The Apostle		SP2	OBJ	The policy should not be adopted at this stage but should wait for further Government guidance on the need for more housing.	Disagree. The Plan needs to set out its intentions for housing provision.
SEERA		SP2	OBJ	The minimum levels of social rented housing that are sought should be stated explicitly in the policy.	The quoted 40% figure in the policy provides an appropriate quantified expression of requirements along with reference to the proportion of rented units in qualifying developments.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Green Street Action Group		SP2	OBJ	The Policy should address congestion, air quality, infrastructure, needs, flooding, sustainability, unsoundness of Government housing requirements for the Borough and no restraints on predatory developers.	The suggestions go beyond the appropriate scope of the policy which is to identify what the Council is intending to provide. Some of the issues are already dealt with in other policies.
Brixton PLC		SP2	SUPP	Brixton support the aim to provide "at least" 151 dwellings per annum to meet the South East Plan requirement for Spelthorne. Brixton also support the aim for providing a mixture of housing types and tenures according to identified local needs. All housing provision should be based upon up-to-date reviews/evidence of housing need and performance against targets. In accordance with PPS3, appropriate contingency measures should be made for alternative allocations at an early stage.	Noted.
Councillor Ian Beardsmore		SP2	OBJ	Overall housing provision is too high, and it is uncertain if lower affordable housing thresholds will deliver more housing.	Disagree. Figure required by draft South East Plan. The intention of a lower affordable housing threshold is to deliver more affordable housing.
CPRE Surrey		SP2	SUPP	Supports the figure of 40% affordable for future housing provision.	Noted.
Crane Road Properties		SP2	OBJ	Object to the figure of 151 dwellings per annum. The policy cannot reasonably be adopted until the South East Plan figure is known. The strategy is heavily reliant on windfall sites, which is contrary to Government advice.	Disagree. Plan must be progressed on the guidance available at the time. Windfalls can be relied upon where there is a robust case to do so.
Fairview New Homes Ltd		SP2	OBJ	In selecting a level of housing provision that disregards the evidence base, the Core Strategy neither meets housing demand or needs identified in the Housing Needs Study. Such as approach conflicts with the advice in para 33 of PPS3. This is inconsistent with the Vision and Objectives of the Core Strategy.	Para 33 of PPS 3 relates to local, sub-regional and regional level of housing provision. Para 34 explains it is firstly for regional plans to allocate requirements to LPAs, having regard to a range of local, sub-regional and regional evidence detailed in Para 33. LDFs must then set out how the allocated figures will be delivered. The Council has properly reflected the intentions of PPS 3 and the draft South East Plan and the local evidence base has informed the type of housing to be provided. The contingency Policy HO2 will, if required, address any shortfall in provision arising from a higher allocation.
Fairview New Homes Ltd		SP2	OBJ	The Core Strategy takes a rigid and narrow approach to housing provision, ignoring the latest evidence base, i.e. 2003 Housing Projections. GOSE objected to the low level of housing provision in the Draft RSS. The Core Strategy needs to be equipped to deal with any potential modifications to housing provision in the South East Plan.	

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Fairview New Homes Ltd		SP2	OBJ	The lack of an appropriate level of housing allocations as well as the requirement for flood risk assessments on allocated sites combine to place uncertainty on both delivery and the quantum of development identified in the Allocations DPD. The Core Strategy is contrary to PPS3 para 54.	All the Allocated sites and other large sites identified in the Housing Trajectory have the support of their respective owners. Those sites requiring a detailed FRA already have a high level FRA.
Fairview New Homes Ltd		SP2	OBJ	Objects to the target of 40% of all new housing being affordable.	No evidence presented to justify this view.
Ashford Sports Club		SP2	OBJ	Object to the figure of 151 dwellings per annum. The policy cannot reasonably be adopted until the South East Plan figure is known. The strategy is heavily reliant on windfall sites, which is contrary to Government advice.	The Plan must be progressed on guidance available at the time. Windfalls can be relied upon where there is a robust case to do so (see PPS 3 para 59).
Mr John Carruthers	6.11		OBJ	No provision for additional infrastructure which is needed (cross refers to Policy CO1).	Objectors have mis-read what the first sentence actually says. It does not say that there are no infrastructure requirements but only that there are no requirements necessitating development to be phased. Infrastructure providers have not identified any significant shortfalls (see the Infrastructure Background paper for the latest position). The Plan contains specific policies requiring infrastructure where needed – SP5, CO1 and CO2 – and policies specifically addressing open space (CO3), affordable housing (HO3) and transport (SP7 and CC2). Air quality issues are addressed in Policy EN3. Para 2.19 acknowledges that in-situ solutions are being considered by the PCT for the Sunbury Health Centre. Surface water flooding has been considered and mapped as part of the SFRA. The SFRA will need to be updated when significant new data emerges.
Stanwell Liberal Democrats	6.11		OBJ	Objects that the paragraph implies there are no infrastructure constraints when there are.	
Shepperton Residents Association	6.11		OBJ	Objects to the first sentence of the paragraph. Considers there are infrastructure constraints that need to be addressed.	
Councillor Ian Beardsmore	6.11		OBJ	Objects to first sentence. Considers transport, localised surface water flooding, health centre provision and sewer capacity present infrastructure constraints on new housing provision. There are particular infrastructure problems that relate to Sunbury including traffic congestion and air pollution. Sunbury Cross is not a transport hub but a transport terminus.	
Cllr Colin Strong	6.11		OBJ	Objects to first sentence of paragraph 6.11. Considers transport capacity is a constraint on the ability to take more housing and the Transport Statement should have considered this.	
Persimmon Homes	6.11-6.13		OBJ	Form of change required not specified. The Site Allocations DPD is unsound and does not provide a sound basis for these paragraphs.	The Council is satisfied that the large sites required to meet the housing requirement are deliverable within the necessary timescales.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Persimmon Homes	6.14		OBJ	Additional sites need to be identified to make it possible to ensure the DPD is sound and thus save contingency measures for extreme cases.	Disagree
Persimmon Homes		HO1	OBJ	The policy would not ensure provision is made for housing because some sites are unlikely to be developable in the first five years of the LDF and would not accord with Government guidance in PPS3. Also proposes an additional point (i): "Granting planning permission for schemes in exceptional circumstances to meet identified need."	The Plan deals with a 20 year period and the Housing Trajectory shows there is more than a sufficient supply for the first 5 years.
Surrey County Council		HO1	SUPP	Supports the policy.	Noted.
SEERA		HO1	OBJ	There should be explicit reference to making better use of the existing housing stock through conversions which is a key part of overall housing in Spelthorne.	The Council recognises the particular role of conversions of existing dwellings to meet housing supply and the role of conversions generally is specifically identified in the housing trajectory. Policy HO1 (c) could helpfully refer to the conversion of existing dwellings which was otherwise subsumed in the general phrase of 'encouraging housing development'. For some parts of the region reducing vacant property is an issue, but not in Spelthorne where levels are below 2%.
Rugby Estates PLC		HO1	SUPP	Supports the policy.	Noted.
Mr Terence Tilby		HO1	OBJ	The number of site allocations should be increased to reduce the reliance on windfall sites in accordance with Government policy in PPS 3 regarding the need to identify "developable" sites.	The Council has identified all sites of 0.4ha or larger available at the early stages of the Plan preparation process. Other larger sites that have emerged subsequently are shown in the Housing Trajectory.
Mr Alan Weston		HO1	OBJ	The policy should include a presumption against "back garden" development for which there is no need, unless the Annual Monitoring Report identifies a significant risk of under provision which would warrant a change from the presumption against.	Policy EN1 provides a basis against which harmful development can be refused, but a blanket objection to a particular type of site cannot be justified.
Home Builders Federation (HBF)		HO1	OBJ	The policy is unclear. It is little more than a statement of aspirations and does not serve any real purpose.	The policy provides a clear statement of how the Council will deliver the draft South East Plan housing requirement and is supported by Policy HO2.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Government Office For The South East		HO1	OBJ	Cannot see how it supports the strategy or inform strategic decisions and place shaping.	Disagree. The policy provides a clear statement of how the Council will deliver the draft South East Plan housing requirement and is supported by Policy HO2.
Congregation of the Sisters of Charity Of St Paul The Apostle		HO1	OBJ	Suggest a new category (i): "New housing should be promoted on sites in part or in whole for changes of use of land or buildings consistent with other policies of the plan".	Already covered in (c) of Policy HO1.
Brixton PLC		HO1	SUPP	Brixton support the approach to promoting specific sites for housing through the allocations DPD and to encouraging housing on other suitable sites (criterion C). To provide certainty and reduce reliance on windfall sites HO1 and HO2 should be cross-referenced to acknowledge that additional identified sites may come forward during or after the LDF preparation. We also strongly support the approach to "encouraging housing development, including change of use of existing buildings to housing, on all sites that are sustainable for that purpose".	Noted. Further cross referencing considered unnecessary.
SD Developments		HO1	OBJ	The number of site allocations should be increased to reduce the reliance on windfall sites in accordance with Government policy in PPS 3 regarding the need to identify "developable" sites.	The Council identified all available sites of 0.4ha or larger at the early stages of preparing the Allocations DPD. Other larger sites that have emerged subsequently are shown in the Housing Trajectory.
Persimmon Homes	6.15-6.18		OBJ	The mechanisms set out in the contingency strategy would be too slow to address the issues that will arise due to too few allocations and an over-reliance on windfalls.	Disagree.
The Pinewood Studios Group	6.18		OBJ	The paragraph should be amended to enable greater flexibility for Green Belt release. Suggests amending the first sentence to read: "There is limited contingency to release Green Belt land for housing, subject to specific consideration of any proposal", adding a new second sentence to clause (I): "However their detailed boundaries may be subject to limited review" and adding "current predicted" before "housing requirements" in clause (ii).	No need to release Green Belt land to meet the housing requirements.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Persimmon Homes	6.19		OBJ	There is no evidence to suggest why Green Belt sites or defined "reserve" sites should not be released as part of a contingency strategy.	In the absence of exceptional circumstances such release is contrary to national, regional and structure plan policy.
Crane Road Properties		HO2	OBJ	Object to the figure of 151 dwellings per annum. The policy cannot reasonably be adopted until the South East Plan figure is known.	The Plan must be progressed on guidance available at the time.
Persimmon Homes		HO2	OBJ	The contingency strategy should only be a last resort and instead more sites should be added to the Allocations DPD.	New sites introduced at a late stage would not have been subject to early community engagement.
Surrey County Council		HO2	SUPP	No concerns over the compliance of the policy concerning housing contingency. Supports the commitment to monitoring and review.	Noted.
SD Developments		HO2	OBJ	The reference to the South East Plan figure should be deleted from HO2 provided adequate provision is made under HO1.	Adequate provision is made under HO1 but a contingency policy represents a prudent safeguard against unforeseen circumstances and ensures delivery.
Rugby Estates PLC		HO2	OBJ	The policy should be amended to state that criterion (a) will happen, whereas (b) and (c) will only happen if necessary.	The sub-points are already qualified by the word 'necessary' – no change is needed.
Home Builders Federation (HBF)		HO2	OBJ	The policy does not provide any contingency should delivery rates fall below the annual target. Reviewing the housing land assessment and the allocations DPD is not a proper contingency. Instead sufficient sites should be provided to meet the requirements of PPS3 so they can be release through a plan-monitor-manage mechanism if necessary.	Adequate provision is made under HO1 but a contingency policy represents a prudent safeguard against unforeseen circumstances and ensures delivery.
Brixton PLC		HO2	SUPP	Brixton supports the proposal to review the Allocations DPD where necessary and bring forward additional sites for housing that is consistent with the Core Strategy and Policies DPD.	Noted.
Ashford Sports Club		HO2	OBJ	Object to the figure of 151 dwellings per annum. The policy cannot reasonably be adopted until the South East Plan figure is known.	The Plan must be progressed on the basis of guidance currently available.
Mr Terence Tilby		HO2	OBJ	The reference to the South East Plan figure should be deleted from HO2 provided adequate provision is made under HO1.	Adequate provision is made under HO1 but a contingency policy represents a prudent safeguard against unforeseen circumstances and ensures delivery.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
The Pinewood Studios Group	6.20		OBJ	The approach outlined is overly rigid and may have the result of slowing economic growth. If there is concern at meeting the target for affordable housing the threshold should be lowered. Suggests additional wording at the end of the sentence starting: "Commercial developments..", "at a reasonable level to be considered on a scheme by scheme basis against the overall policy aspirations and impact on viability of any scheme. A threshold of 100sq m increase in floorspace is set".	The policy needs to be clear and specific so developers know in advance what is required. The suggested additional wording is imprecise and does not add anything helpful to the policy. The threshold of 1000m <sup>2</sup> is judged to be appropriate.
Mr Alan Weston		HO3	OBJ	The policy is premature in the light of recent Government announcements. Thresholds for provision lead to developments being manipulated to fall outside the limit. A more elaborate means of providing affordable housing is needed.	The policy takes account of latest Government guidance and specific thresholds is intended to limit the means of schemes avoiding making a contribution.
A E Kendrick (Garages) Ltd		HO3	OBJ	The thresholds for affordable housing should be raised and the proportion of affordable housing provided retained at the level specified in the adopted plan or indeed lowered. In addition exception sites should be permitted within the Green Belt. The thresholds for affordable housing and the proportion of affordable housing to be provided on qualifying sites will act as a deterrent to meeting the Council's housing objective. Affordable housing exception sites outside the built up areas and within the Green Belt would encourage the provision of affordable housing.	The thresholds are both necessary to deliver the 40% figure and justified by evidence – see background document 'Provision of Affordable Housing' and the 'Housing Market Assessment'. Release of Green Belt land is not justified.
Surrey County Council		HO3	SUPP	Supports the policy.	Noted.
The Pinewood Studios Group		HO3	OBJ	To provide greater flexibility the start of clause (d) of the policy should read: "Negotiating for a reasonable and viable financial contribution..."	The suggested wording adds nothing that is not already implicit in the word 'negotiate'.
Spelthorne Constituency Labour Party		HO3	OBJ	Object to the provision for developers to offer a financial contribution in lieu of requirements for affordable housing.	This is appropriate where on-site provision cannot be made.
Spelthorne College		HO3	OBJ	The policy should allow for site specific agreements to reflect the particular circumstances of each site. Add to end of policy: "Affordable housing will be negotiated on a site by site basis taking into account other site development costs and site requirements".	These issues are already covered by the word 'negotiate'.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
SEERA		HO3	OBJ	The minimum levels of social rented housing that are sought should be stated explicitly in the policy. The term "intermediate housing" should be used rather than "shared ownership".	The social rented requirement is already clear given the % limit on 'shared ownership'. The term 'shared ownership' is preferred as it is more readily understood by the public – the meaning of the word 'intermediate' is obscure.
SD Developments		HO3	OBJ	The requirement for affordable housing is onerous and has not been substantiated. It could impact on viability and deliverability of sites. The 40% requirement should be set as a guideline or target level only and the threshold should be changed to the national threshold of 15 dwellings. An approach of varied thresholds for different areas based on economic viability should be considered. Affordable housing should be negotiated on a site by site basis.	The requirements are substantiated in the supporting evidence and viability issues have been assessed.
Rugby Estates PLC		HO3	OBJ	The references to 50% and 40% are confusing. Part (a) should be amended to require 40% with flexibility to take site-specific considerations into account. Objects to the wording that permission will be refused if the applicant is unwilling to make reasonable provision for affordable housing, on the grounds that it provides insufficient flexibility. The wording on providing affordable housing in perpetuity should be amended to provide flexibility to accommodate the "staircasing" approach.	The wording of the policy is considered clear and appropriate. The 50% and 40% refer to different elements of the policy.
Persimmon Homes		HO3	OBJ	Does not accept the 40% figure is achievable and questions whether the 50% figure on sites of 10 or more units viable or sustainable. To provide more affordable housing more sites should be allocated.	The Council's evidence base has demonstrated viability and the policy has been designed to secure the 40%. The policy specifically refers to provision being negotiated to take account of viability issues.
LaSalle Investment Management		HO3	OBJ	Insufficient justification has been provided for the 1,000 sq m threshold within the policy (clause (d)). The threshold has no regard for different employment ratios associated with different uses and does not explain how the contributions will be calculated. Commercial/viability factors of individual schemes should be considered in calculating whether a contribution is reasonable. Additional wording proposed after clause (d): "The Council will publish a Supplementary Planning Document on Affordable Housing wherein the basis on which details of calculating an appropriate level of contribution will be contained".	Para 13.7 already states the Council intends to bring forward a Supplementary Planning Document on affordable housing.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Home Builders Federation (HBF)		HO3	OBJ	The policy is contrary to Government policy advice in PPS3 and PPS12 in that it is not based on a housing market assessment carried out in accordance with Government guidance. In the absence of such an assessment there is no conclusive evidence to depart from the national threshold or to adopt the 40% target. The 40% target should be deleted and the site threshold increased to 15 dwellings.	The policy is based on an HMA which is based on draft government guidance available at the time. The 40% target is already in the adopted Surrey Structure Plan.
Fairview New Homes Ltd		HO3	OBJ	Objects to the target of 40% of all new housing being affordable and the target of 50% on sites of 10 or more dwellings or 0.3 ha or larger. The wording of the policy should be changed to state that "affordable housing targets should be indicative and set at a maximum negotiation level". The affordable housing mix on new development sites should be negotiated on a site by site basis.	The policy is based on an HMA which is based on draft government guidance available at the time. The 40% target is already in the adopted Surrey Structure Plan.
Crane Road Properties		HO3	OBJ	There should be flexibility in the consideration of individual sites and 50% should not be seen as a target.	The policy is based on an HMA which is based on draft government guidance available at the time. The 40% target is already in the adopted Surrey Structure Plan.
CPRE Surrey		HO3	SUPP	Supports the requirement for 50% affordable from sites of 10 units or more, a financial contribution from sites of 4-9 units and from schemes with an increase of 1,000 sq m or more. These are necessary to meet the requirements for more affordable housing.	Noted.
Councillor Ian Beardsmore		HO3	OBJ	Doubtful if 40% affordable housing can be achieved.	Disagree.
Congregation Of the Sisters Of Charity Of St Paul The Apostle		HO3	OBJ	The reference to 50% conflicts with Policy SP2. The policy is badly worded and should not contain reference to both 40% and 50%.	The two percentages refer to different things and there is no conflict.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Clerical Medical Investment Group Ltd		HO3	OBJ	Insufficient justification has been provided for the 1,000 sq m threshold within the policy (clause (d)). The threshold has no regard for different employment ratios associated with different uses and does not explain how the contributions will be calculated. Commercial/viability factors of individual schemes should be considered in calculating whether a contribution is reasonable. Additional wording proposed after clause (d): "The Council will publish a Supplementary Planning Document on Affordable Housing wherein the basis on which details of calculating an appropriate level of contribution will be contained".	Para 13.7 already states the Council intends to bring forward a Supplementary Planning Document on affordable housing.
Ashford Sports Club		HO3	OBJ	There should be flexibility in the consideration of individual sites and 50% should not be seen as a target.	The policy is based on an HMA which is based on draft government guidance available at the time. The 40% target is already in the adopted Surrey Structure Plan.
Brixton PLC		HO3	OBJ	There does not appear to be clear evidence to support the 40% affordable housing figure or to support the financial contribution on schemes of four to nine dwellings, which would render the majority of such schemes unviable.	Evidence set out in 'Provision for Affordable Housing' and the 'Housing Market Assessment'.
Mrs Caroline Nichols		HO4	OBJ	Extra-care housing deserves more special attention in the LDF to ensure delivery of such accommodation. Schemes should not exceed 80dph. Changes: 1. Wants reference to compliance with Housing Corporation requirements for open space and access to amenities. 2. Identify extra-care housing requirement as the top priority. 3. Amend the vision at para 3.3	Reference in Policy HO4 is considered sufficient to ensure delivery given progress already. Density limit inappropriate – needs to be related to the circumstances of the site in question. Open space requirements are already dealt with in Policy CO3. Too specific an issue for reference in the vision.
Spelthorne College		HO4	OBJ	The policy is too prescriptive and should allow more flexibility. Add to end of policy: "Housing mix will be determined on a site by site basis taking into account site characteristics, housing need and the local housing market".	Site issues already covered in Policy EN1 – but prescription of policy necessary to ensure an appropriate mix of housing.
Surrey County Council		HO4	SUPP	Supports the policy.	Noted.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Persimmon Homes		HO4	OBJ	The policy is too prescriptive. It could conflict with other policies on local character and guidance in PPS3 on housing for families.	The detail is necessary but any proposal must take account of all the policies of the Plan including those related to character.
Home Builders Federation (HBF)		HO4	OBJ	The policy should be deleted. The necessary evidence is not available to justify the policy in the absence of a full housing market assessment. Local authorities should not seek to control the size and type of dwellings built by the private sector.	Evidence is set out in the HMA.
The Pinewood Studios Group		HO4	OBJ	Greater flexibility is needed in the wording of the policy to meet both current and future requirements. Suggests adding to the 1st sentence after "by": "monitoring and managing the current and emerging requirements through regular Housing Needs Assessment. This will be achieved, subject to consideration of the site, scheme proposed and local area by:" and adding to clause (a): "subject to consideration of the site and viability of the scheme".	It is for the Plan to determine which is needed, not future studies. Flexibility is not required.
Fairview New Homes Ltd		HO4	OBJ	Part (a) of the policy should be deleted because it imposes an unjustified restriction on housing development that goes well beyond the intentions of planning legislation. Instead the policy should state: "Housing size and types for each development will be assessed on a site by site basis taking into consideration market and commercial considerations."	House size and type need to relate to needs which have been assessed and set out in the HMA.
Lower Sunbury Residents Association		HO4	OBJ	Fails to provide the type of housing people want.	Disagree.
Mr Alan Weston		HO4	OBJ	Question the need for such a high proportion of one and two bed units. Also concerned at the related reduction in living space standards for people. Further research is needed and the policy should be reconsidered.	As set out in Para 6.22-6.23 the proportion reflects the limited number of existing smaller units and the growth in size of existing dwellings through extensions.
Persimmon Homes	6.26-6.29		SUPP	Supports the approach to housing density.	Noted.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Staines Town Society		HO5	OBJ	Policy should set maximum densities so overall housing provision does not exceed housing targets and place constraints on infrastructure. High density schemes of flats do not produce a stable social mix.	Using density policy to limit housing provision is unjustified and inappropriate. Where impacts on infrastructure are created contributions can be required under Policy CO2.
Surrey County Council		HO5	SUPP	Supports the policy.	Noted.
Spelthorne College		HO5	OBJ	The policy is too prescriptive and should allow more flexibility. Add to end of policy:  "In all circumstances, site densities will be determined on a site by site basis depending upon site characteristics".	This would not give sufficient guidance on what is required.
Rugby Estates PLC		HO5	SUPP	Supports the policy including density guidelines provided the policy remains flexible to ensure development schemes maximise the use of sites.	Noted.
Persimmon Homes		HO5	SUPP	Supports the policy.	Noted.
Fairview New Homes Ltd		HO5	OBJ	Objects to clauses (a) - (d). Instead the policy should state that density and scale of development should be considered on a site by site basis.	This would not give sufficient guidance on what is required.
Councillor Ian Beardsmore		HO5	OBJ	Delete reference to a minimum density of 35 dwellings per hectare.	Minimum figure appropriate to ensure land used effectively and efficiently (see PPS3 – para 69).
Brixton PLC		HO5	SUPP	Brixton support the key elements of the guidance on housing density and its flexibility, particularly the assertion that "higher density development may be acceptable where it is demonstrated that the development complies with policy EN1 on design". Any policy on density must acknowledge that both PPS1 and PPS3 do not advocate any approach that constrains future development density based upon existing conditions alone.	Noted.
Surrey County Council		HO6	SUPP	Supports the policy including the specific references to safeguarding existing provision and possible additional provision together with the approach to development in the Green Belt. Also supports the intention to prepare a separate Sites DPD if needed.	Noted.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Staines Town Society		HO6	OBJ	The Policy should not allow new or extended Gypsy and Traveller sites in the Green Belt.	The policy reflects guidance in Circular 1/2006 'Planning for Gypsy and Traveller Caravans' – para 49.
Surrey County Council		HO7	SUPP	Supports the policy and considers the approach to be sound under emerging Government guidance to replace Circular 22/91.	Noted.
Surrey County Council	CHAP	7	SUPP	Supports the approach and policies of the chapter.	Noted.
BAA Heathrow	PARA	7.7	OBJ	The Air Transport White Paper supports growth of Heathrow beyond Terminal 5 although it is acknowledged that until the Government confirms a policy decision on the extent of growth it could be difficult to plan for in respect of additional employment land needs. The paragraph should be expanded to make reference to future growth of Heathrow beyond Terminal 5 and potential implications of this on employment land demand. At the very least the paragraph must commit the Council to reviewing employment land strategy/policy once the Government confirms a policy decision on Heathrow's growth.	<p>The Government's Future of Air Transport White Paper, 2003, expresses support for further growth at Heathrow in the form of another runway north of the existing airport provided specific requirements relating to air quality, noise and surface access are met. It suggests the runway might be available in the period 2015-2020. It also suggests changes to allow more intensive use of the existing runways should be examined, including mixed mode operation. The Government initiated studies to examine whether the air quality, noise and surface access requirements could be met and consulted on the findings of these studies between November 2007 and February 2008. A final policy decision will be made some time after the close of the consultation (not expected now until early 2009).</p> <p>In the absence of a final decision by the Government on further expansion there is no basis for releasing any additional employment land in Spelthorne in connection with the expansion of Heathrow beyond T5. The Council recognises that employment land requirements within and around the airport would need to be re-examined should further expansion be agreed and that this may in turn require a future review of the employment land strategy if additional land is shown to be needed. Other aspects of the spatial strategy may also require review.</p> <p>An amendment to the wording of paragraph 7.7 to incorporate the possible need for a future review has been agreed with BAA.</p>

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
CEMEX	PARA	7.7	OBJ	The paragraph ignores the clear Government support for future expansion of Heathrow within environmental limits and the stated requirement in the Air Transport White Paper for land needed for future airport expansion to be safeguarded.	See comment above. The White Paper requires the land needed for the third runway to be safeguarded. The area concerned is shown on the map on page 124 of the White Paper. It does not include any land in Spelthorne.
Green Street Action Group		SP3	OBJ	Policy fails to take account of high office vacancy rate, high proportion of warehousing with its adverse traffic impact, loss of industrial land to housing with no consideration of alternative uses and industrial restructuring.	All these issues have been taken into account in preparing the Plan.
Ashford Sports Club		SP3	OBJ	The following sentence should be added after the first sentence: "It will make provision for employment development by safeguarding and encouraging the effective use of designated employment land that is appropriately located for that use, and allocating land for employment uses that meet the needs of Heathrow Airport."	Major employment sites have already been designated. With regard to Heathrow the Terminal 5 Inquiry concluded that requirements for airport related development arising from Heathrow with T5 could be met without releasing additional land. If further expansion is agreed it is acknowledged that a future review may be needed (see response to BAA on para 7.7 above) but it cannot be concluded at this stage that there will be a need to allocate additional land in Spelthorne for employment purposes arising from the growth of Heathrow.
Brixton PLC		SP3	SUPP	Brixton support the policy approach to maintaining larger well-sited employment areas in Spelthorne, where a need can be demonstrated, thus allowing for the release of smaller less well-located sites.	Noted.
CEMEX		SP3	OBJ	The policy is inconsistent with national policy in ignoring the potential for Heathrow expansion beyond Terminal 5. The DPD should provide for a future review of employment and other related policies, including the Green Belt boundary, to provide for further land release to enable the accommodation of uses associated with an expanded airport.	See response to BAA on para 7.7 and Ashford Sports Club on SP3
Councillor Tony Crabb		SP3	OBJ	There should not be a presumption of retaining the amount of office development in the Borough because the growth in teleworking will mean less space is required.	There is no evidence to support the growth of teleworking of a scale to justify reducing the amount of office floor space.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Crane Road Properties		SP3	OBJ	The following sentence should be added after the first sentence: "It will make provision for employment development by safeguarding and encouraging the effective use of designated employment land that is appropriately located for that use, and allocating land for employment uses that meet the needs of Heathrow Airport".	Major employment sites have already been designated. With regard to Heathrow the Terminal 5 Inquiry concluded that requirements for airport related development arising from Heathrow with T5 could be met without releasing additional land. If further expansion is agreed it is acknowledged that a future review may be needed (see response to BAA on para 7.7 above) but it cannot be concluded at this stage that there will be a need to allocate additional land in Spelthorne for employment purposes arising from the growth of Heathrow.
WM Morrison Supermarkets PLC		EM1	OBJ	This policy lacks flexibility. If there were no market interest for employment uses on these sites, it would result in the inefficient use of land.	The policy has to ensure adequate employment provision for the plan period as a whole and not respond to short term market variations.
Brixton PLC		EM1	SUPP	Brixton support the proposal for protecting and promoting employment uses within the designated employment areas.	Noted.
Clerical Medical Investment Group Ltd		EM1	SUPP	Supports the aims of the policy, which is consistent with Government guidance on economic development and town centres.	Noted.
Galliard Homes Ltd		EM1	OBJ	The objector owns the freehold of Mimosa Court, which is part of the Ashford Rd, Littleton Rd and Spelthorne Lane, Ashford designated employment area. The premises should be deleted from the designated employment area because they are partly vacant and difficult to relet and the whole site will be available for redevelopment during the plan period. There are weaknesses in the employment land study on which the designation is based. Alternatively criterion (c) of the policy should be amended to allow for the loss of offices for which there is a demonstrable lack of demand or which are poorly located.	The representation site forms a substantial part of the designated employment area, which the Economy and Employment Land Study found to be a good site for continued employment use. Redevelopment for housing would result in a significant loss of employment land and bring housing closer to the remainder of the commercial area creating potential environmental issues. If the site becomes available for redevelopment alternative employment uses should be considered. The policy is intended to maintain a long term stock of land in employment use. The amendment would weaken the policy by allowing erosion of the stock due to short term variations in market demand.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Ian Allan Group		EM1	OBJ	The employment area designation for Shepperton should be deleted because the town is not of sufficient standing to be covered by the policy. Failing that the area north of the High Street should be deleted on the grounds that it is a secondary location that does not justify inclusion in the designated area.	The designated employment area makes a contribution to maintaining the employment capacity of the Borough and is appropriately located in relation to adjoining uses and is accessible.
Ian Allan Group		EM1	OBJ	Paragraph (c) should be amended for consistency to add the words "land or" before floorspace in the second part of the sentence so that it matches the wording in the first part of the sentence.	Agree the factual correction would be helpful.
LaSalle Investment Management		EM1	SUPP	Supports the aims of the policy, which is consistent with Government guidance on economic development and town centres.	Noted.
Robert Brett & Sons Ltd		EM1	OBJ	Paragraph a) should include the existing employment area at Littleton Lane, Shepperton. This industrial area is long established and provides employment opportunities within a variety of small industrial units.	The site is required to be cleared in due course to meet the requirements of a legal agreement associated with permission for gravel extraction. The site is in the Green Belt and in Flood Zone 3b where there would be fast flowing flood water. Designating the site under Policy EM1 would establish support for the principle of further employment development in this location, which would be contrary to the locational strategy. No justification for designating the site.
Rugby Estates PLC		EM1	SUPP	Supports the policy as amended from the Preferred Options. To remove ambiguity the policy should refer to "designated" employment areas.	Noted – already refers to designated areas.
The Pinewood Studios Group		EM1	OBJ	Supports the inclusion of Shepperton Studios as an identified site in the policy. There is scope for some increased flexibility to allow for small scale release of employment land subject to suitable alternative proposals. Suggests adding to the end of clause (c): "or an alternative appropriate use that can suitably be justified to meet local needs".	The suggestion is vague and undermines the intention of the policy to maintain the Borough's employment capacity.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Staines Town Society		EM1	OBJ	Increasing the amount of office floorspace in Staines is significantly changing the nature and appearance of the town for the worst, and draws in people who have no commitment to the area and provide little or no benefit for the community. In addition, every new development appears to give rise to the closure of small local resources and the opening of a proliferation of fast food outlets.	The grounds for the objection are unsubstantiated and development which accords with the policies of the plan as a whole should not harm the town overall and its important role as a town centre if the other policies of the plan are adhered to.
Mr Terence Tilby		EM2	OBJ	The policy should take into account existing employment sites in the Green Belt.	Policy EM2 is not a site-specific policy. It applies to employment development in all areas of the Borough, apart from those designated under EM1. In Green Belt areas the assessment of acceptability would need to include establishing that “very special circumstances” exist to justify the development as required under Government Guidance in PPG2.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

CHAPTER 8 TOWN CENTRES AND RETAIL DEVELOPMENT					
Respondent	Part No	Policy	Type	Summary of Representation	Response
Surrey County Council	8		SUPP	Supports the approach and policies of the chapter.	Noted.
Green Street Action Group		SP4	OBJ	Policy fails to take account of the growing influence of Tesco, Kempton Park Market, Hounslow town centre, Feltham and car boot sales, impact of housing costs on consumer expenditure or growth in internet shopping. No account of leisure and hotel facilities in Staines, or expenditure levels in existing centres and other major stores. No account of car sales trade and scrap cars. No research on public's aspirations.	The Retail Study has been based on detailed research of shoppers and those living in the catchment areas of the Borough's centres and also market advice. There are separate background reports on Hotels and Open Space, Sport and Recreation including leisure facilities.
Cllr Colin Strong	8.13		OBJ	Objects that reference to traffic congestion in Staines Town Centre is not accompanied by any improvements.  Form of change required not specified.	General issue of congestion and traffic management is primarily a matter for the County Council's Local Transport Plan. The policy encourages improvements and makes specific requirements on new development and encourages alternative transport generally (Policy CC2). The County Council is currently studying the issue.
LaSalle Investment Management		TC1	OBJ	Supports the overall aim of the policy. Seeks the following amendment to 1st sentence of clause (c) to recognise the parking needs of workers in Staines: "c) manage its public car parks to give priority to meeting demand from shoppers and make appropriate provision for long stay parking to achieve a balance between providing for long stay parking to support existing businesses and supporting strategies to encourage other modes".	The suggested alternative wording would weaken the intention to encourage more sustainable patterns of travel sought in Policy CC2.
Staines Town Society		TC1	OBJ	Amend Policy TC1 as follows: (a) make provision for a small amount of retail development to meet the needs of local residents. (b) encourage measures to improve traffic management in the town centre and to further improve accessibility by public transport and other non car-based modes and require such improvements in connection with any developments in the town centre.	The Retail Study has demonstrated that a significant increase in floorspace is required to meet the needs of those who rely on the town. The policy already supports improvements to traffic management and public transport, and Policy CC2 identifies the requirements all developments must meet.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Arlington Property Investors		TC2	OBJ	<p>The policy should refer to shopping frontages rather than areas to comply with PPS6 and there should be more flexibility in the primary frontage to accommodate non-A1 uses where they will not undermine vitality or viability of the centre. Amended wording is proposed for the primary frontage:</p> <p>"Within the primary shopping frontages of Staines Town Centre, uses other than retail within Class A1 will only be permitted where:</p> <p>a) the proposal would sustain or enhance the vitality and viability of the primary shopping area.</p> <p>b) the proposal would not undermine the vitality and viability of the particular frontage, either on an individual basis or cumulatively as part of other existing or approved non-A1 uses.</p> <p>c) where planning permission is granted, conditions will be used to ensure that the ground floor shop window provides a display of visual interest and is consistent with the appearance of other units in the primary shopping frontage.</p> <p>For secondary frontages the amended wording replaces "areas" with "frontages" and deletes clauses (c) and (d).</p>	<p>PPS 6 refers in para 2.16-2.17 to both the primary shopping 'area' and to 'frontages'. Staines has a relatively simple and limited street pattern and whilst the policy uses the term primary and secondary shopping 'areas' there can be no uncertainty about the 'frontages' to which they policy applies. Para 2.17 of PPS 6 states that primary shopping areas should contain a high proportion of retail uses. The Elmsleigh Centre is a covered shopping centre under single management control and is almost wholly in A1 use (94.8%). The High Street and Two Rivers area has an A1 shopping frontage of 74.1%. The 25.9% of non A1 use is a relatively high percentage for a primary shopping area and the presumption in Policy TC2 against further loss is considered justified and consistent with PPS 6. The suggested relaxation of the policy is considered inappropriate.</p>
Clerical Medical Investment Group Ltd		TC2	OBJ	<p>Supports clause (d) but seeks additional wording to take account of regeneration benefits of redevelopment schemes: "...or where it is part of a larger development that would deliver regeneration benefits that outweigh the loss of the retail use".</p>	<p>There are no regeneration proposals in Staines or need for such economic renewal as the town centre is not suffering an economic decline, therefore the suggested wording is unjustified.</p>
Mrs J Wood		TC3	OBJ	<p>Ashford town centre is now a ghost town with unsold shops and flats. Most of the small, more interesting shops that used to draw people into the town have closed, often due to rent increases, and been replaced by poorly designed flats. The town has very little to be proud of and no feeling of belonging. Problems of vandalism and graffiti may be due to young people feeling no sense of pride in the town.</p> <p>The plans are very impressive and well-presented but do not fulfil the Council's commitments or objectives as to meeting the needs of the community or for a sustainable place to live and work at the moment.</p>	<p>Town centres such as Ashford have seen their role change in recent decades with the advent of food superstores and non-food retailing growing only in larger centres. The policy is intended to allow scope for non-retail uses to meet a wider service need but not to the detriment of a primarily retail role. The percentage of vacant premises is 6.8% (11 units out of 161) (August 2007).</p>

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
White Young Green Planning		TC5	SUPP	Policy TC5 of the Core Strategy and Policies DPD should not preclude appropriate expansion and modernisation of existing retail facilities at out-of-centre locations within the Borough, subject to tests outlined in PPS6.	The suggested interpretation of the policy is too open ended and could lead to unconstrained growth of floorspace at existing out of town locations contrary to the intention of PPS 6 to focus retailing on town centres.
Government Office For The South East		TC5	OBJ	Adds nothing to national policy in PPS6.	The Borough has faced a number of proposals in recent years for out of centre retail development, and the policy has an important role in making clear the Council's stance on this issue in the context of its clear strategy to focus retail development on existing centres.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

CHAPTER 9 COMMUNITY NEEDS					
Respondent	Part No	Policy	Type	Summary of Representation	Response
Persimmon Homes	9.1-9.6		SUPP	Supports the approach to meeting community needs.	Noted.
Green Street Action Group	9.2		OBJ	No evidence of the capacity of existing infrastructure.	Infrastructure providers have confirmed there is generally no lack of capacity.
Brixton PLC		SP5	SUPP	Brixton support the policy approach to providing community facilities but would recommend that the extent of contributions, to "necessary improvements" are proportionate to the level of need or impact generated by a development and are considered against other potential benefits generated by the development in question. It is potentially onerous and contrary to Government guidance to expect developments to address existing or historical deficiencies.	Agree – the policy is intended to operate within the terms of Circular 5/2005 'Planning Obligations'.
Government Office For The South East		SP5	OBJ	Does not appear to add to guidance in government circulars.	Circular 5/2005 expects development plans to set out requirements and it identifies the issues to be covered. It is clear from the Circular that it was never intended that developers should rely on the Circular alone. The policy, along with policies CO2 and CO3, seek to follow that requirement.
Green Street Action Group		SP5	OBJ	This policy needs to: 1) outline the process of how need is determined. 2) commit to an annual review of facilities. 3) safeguard the Ashford Hospital site for health use.	Details of the process of determining need are best set out in the planned SPD on Development Control Policies. Plans have to be kept under review and it is unnecessary to include a commitment to review within a policy. It is for the relevant health care providers to indicate what facilities they require. The Hospital Trust has recently declared the site of the former maternity block at Ashford Hospital surplus and sold the site.
Persimmon Homes		SP5	SUPP	Supports the policy.	Noted.
Persimmon Homes		CO1	OBJ	Supports the policy but adds that additional land needs to be identified in Sunbury to meet community and open space needs. They refer to their site at Stratton Road.	There are no community needs which the site could contribute to. The site is in the Green Belt.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
The Theatres Trust		CO1	SUPP	This policy contains all the elements we expect to see in a Core Strategy - to provide for the provision of new facilities, to support improvements to existing facilities and to resist the loss of existing facilities.	Noted.
Surrey County Council		CO1	SUPP	Supports the policy.	Noted.
Spelthorne College		CO1	SUPP	Supports the policy.	Noted.
Government Office For The South East		CO1	OBJ	Does not appear to add to guidance in government circulars.	Circular 5/2005 expects development plans to set out requirements and it identifies the issues to be covered. It is clear from the Circular that it was never intended that developers should rely on the Circular alone. The policy, along with policies CO2 and CO3, seek to follow that requirement.
Sport England South East		CO1	SUPP	Supports the policy. The Playing Pitch strategy currently being prepared jointly with the Council will provide a sound information base for making decisions on future development of playing pitches.	Noted.
Green Street Action Group	9.9		OBJ	Fails to consider cumulative impact of development on infrastructure needs.	Disagree. See Policy CC2 (d III) on transport and CO3 on Provision of Open Space.
Mr J Carruthers		CO1	OBJ	Wording of policy not sufficient in its support for facilities and in resisting their loss.	Disagree. No alternative wording suggested by the objector.
SEERA		CO2	OBJ	The policy would be improved making a more explicit link between infrastructure and new development on a broader scale and also by including the definition of infrastructure in the Implementation Plan of the draft South East Plan.	The SEERA definition covers a very wide range of items (although not everything). Some of these are things not required in Spelthorne e.g. additional schools, and to list all the items could therefore be misleading. The general description in Para 9.9 of the DPD is therefore considered more appropriate.
Surrey County Council		CO2	SUPP	Supports the policy and the related references to meeting the infrastructure requirements of new developments in paragraph 9.2 together with the reference to developer contributions in paragraph 9.4.	Noted.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Thames Water		CO2	OBJ	<p>The policy is not sufficiently sound. The Core Strategy should refer to the provision of adequate water and sewerage infrastructure to service all new development and thereby avoid unacceptable environmental impacts. A new water and waste policy should be included: "Water and sewage infrastructure – planning permission will only be granted for developments which increase the demand for off-site service infrastructure where: 1. sufficient capacity already exists, or 2. extra capacity can be provided in time to serve the development which will ensure that the environment and the amenities of local residents are not adversely affected. When there is a capacity problem and improvement in off-site infrastructure are not programmed, planning permission will only be granted where the developer funds appropriate improvements which will be completed prior to occupation of the development".</p> <p>Thames Water is a major landowner in the Borough and an additional policy is proposed to meet the requirements of utilities for development to meet demands placed upon them: "Utilities Development: The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact and that any such adverse impact is minimised".</p>	<p>Para 9.9 and Policy CO2 are already clear on the general scope of infrastructure needs and includes specific references to sewerage disposal. The policy is clear and generic on the requirements of developers to provide for infrastructure whatever it may be.</p> <p>It is recognised that Thames Water has a significant land holding in the Borough used in the storage, treatment and supply of drinking water. Most of this land holding is in the Green Belt. Circular 17/91 'Water Industry Investment: Planning Considerations' provides clear guidance to local authorities on how to respond to proposals for improvements to water supply and treatment, which is more detailed than the wording suggested. It is unnecessary, therefore, to repeat government guidance in a DPD policy in this case.</p>
Sport England South East		CO2	SUPP	Supports the policy and would be pleased to offer support with future supplementary planning guidance on developer contributions.	Noted.
Green Street Action Group		CO2	OBJ	Add the following: "as assessed by the Council and not less than the standard for the type of development".	This wording adds nothing of value to the policy as drafted as the Council will always assess a proposal, and needs it generates, when determining any planning application.
Government Office For The South East		CO2	OBJ	Does not appear to add to guidance in government circulars.	Circular 5/2005 expects development plans to set out requirement and it identifies the issues to be covered. It is clear from the Circular that it was never intended that developers should rely on the Circular alone. The policy, along with policies CO2 and CO3, seek to follow that requirement.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Fairview New Homes Ltd		CO2	OBJ	The policy should make clear that planning contributions and provision of open space should be negotiated on a site by site basis and that they should not be used to achieve wider planning objectives that are not necessary to allow consent to be given for a particular development.	The scope for negotiations is made clear in Circular 5/2005 and the policy must operate within its terms.
Brixton PLC		CO2	SUPP	Brixton recommend that contributions towards new infrastructure are considered on a case-by-case basis according to the impact generated by the scheme, the viability of the scheme and other benefits and relevant material considerations.	
Rugby Estates PLC		CO2	OBJ	The policy should be amended to clarify that financial contributions will only be sought where they are needed and are related in scale and kind to the proposed development.	
Cllr Ian Beardsmore		CO2	OBJ	Plan fails to take account of cumulative impact from development and meet existing shortfalls.	Policy CO2 has been phrased to enable any legitimate requirement to be contributed to. This enables contributions to be secured and impact from cumulative development to be addressed.
Persimmon Homes	9.10-9.13		SUPP	Supports the approach to provision of open space in new developments.	Noted.
Green Street Action Group	9.10-9.13		OBJ	Only deals with the open space needs of development of 30 dwellings or more.	Second part of the policy deals with any housing development.
Spelthorne Constituency Labour Party	9.11		OBJ	Public open space should also be provided for elderly person's accommodation.	Second part of the policy deals with any housing development.
Rugby Estates PLC		CO3	OBJ	The policy should be amended to clarify that contributions will only be sought where they are needed and are related in scale and kind to the proposed development.	The scope for negotiations is made clear in Circular 5/2005 and the policy must operate within its terms.
Brixton PLC		CO3	SUPP	Brixton recommend that the provision of open space to be considered on a site-by-site basis, having regard to the characteristics of the site, its dwelling and land use mix and its wider location. For example, it may be possible to provide an off-site contribution to enhance existing facilities in the area that are better suited to making a wider contribution. Equally, if the on-site open space that can be provided on-site exceeds the minimum of 0.1 ha, then the additional open space provided should be considered as an "in kind" planning contribution and should therefore reduce the level of S106 contributions that are required in relation to the development in question.	It is considered the policy adequately covers the additional comments made in support.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Sport England South East		CO3	SUPP	Welcomes that all new housing in areas with open space deficiencies will be required to provide open space or contribute to off site provision. The PPG17 assessment and forthcoming Playing Pitch Strategy should inform these decisions.	Noted.
Persimmon Homes		CO3	OBJ	Supports the policy but adds that allocation of further sites in Lower Sunbury could contribute to provision.	There is no particular shortage of open space in Lower Sunbury.
Mrs Caroline Nichols		CO3	OBJ	Wants policy replaced by the wording in Local Plan Policy BE15, plus requirement for open space provision for extra care housing.	Disagree. Private open space would in any case be required. Second paragraph of policy covers any development.
Green Street Action Group		CO3	OBJ	Policy does not take account or deal with loss of garden land and generally needs to assess the green space available and quantify the shortfall.	A study of Open Space, Sport and Recreation has assessed needs. The loss of a particular garden needs to be assessed in the context of the application concerned.
Fairview New Homes Ltd		CO3	OBJ	The policy should make clear that planning contributions and provision of open space should be negotiated on a site by site basis and that they should not be used to achieve wider planning objectives that are not necessary to allow consent to be given for a particular development.	The scope for negotiations is made clear in Circular 5/2005 and the policy must operate within its terms.
Councillor Ian Beardsmore		CO3	OBJ	Public open space should be provided for all housing developments, plus a 5% addition over and above requirements currently in the policy.  Delete the word "family" from the policy and add reference to an additional 5%.	Some areas of the Borough have sufficient open space and additional provision would not be justified. Projections show that despite additional housing the population will fall slightly and suggests existing space will not be put under greater pressure. There is no justification therefore for the suggested 5% additional requirement. Use of the word 'family' is intended to cover the particular on-site requirement of open space for children.
Staines Town Society		CO3	OBJ	Needs to be clearer on what family accommodation is, and if public open-space should be on-site suggest "on-site" be inserted in from of "public space increased proportionally....." in the first paragraph.	Family accommodation is that which might be expected to have children – it is felt this is already clear in the accepted meaning of the word family. The word 'on-site' is unnecessary as the requirement is already clear by use of the word 'inclusion'.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Government Office For The South East	10		OBJ	Policies EN2 - EN22 appear to add nothing to national policy or meet in full the test for development control policies in PPS12.	Policies EN18-22 are policies 'saved' from the Local Plan and are included for information only. Policies EN2-17 provides a limited suite of policies covering a wide range of issues and containing between them important local detail which is brought together in one place.
CEMEX	10		OBJ	Policy RU3 of the Local Plan regarding areas of degraded landscape and the associated notation should be included in the new plan.	The principles of Local Plan Policy RU3 are now covered in Policy EN8 of this plan.
Green Street Action Group	10.1		OBJ	Objectives will not be achieved because the environment is deteriorating.	The purpose of the objectives and policies is to ensure this does not happen.
SEERA		SP6	OBJ	The DPD would be improved by explicit reference to sustainable design and construction in the policy to bring consistency with terms use in the draft South East Plan.	The point is effectively covered by Policies EN1 and CC1.
Spelthorne College		SP6	OBJ	The term "historic buildings" has no agreed or statutory definition and should be replaced in the policy with "statutory listed buildings".	The terms covers both statutory listed buildings and locally listed buildings and is explained in para 10.25.
Natural England		SP6	SUPP	Supports the policy.	Noted.
Councillor Ian Beardsmore		SP6	OBJ	Objects because it contains no reference to BREEAM "very good" or eco-homes "good" standards.	Both terms are referred to in Policy CC1. Too detailed a point to be included in Policy SP6.
Brixton PLC		SP6	SUPP	Support the policy, particularly the first sentence and provision relating to design and protection for areas of environmental quality. Comment that existing character should not act as an overriding constraint.	Noted.
Green Street Action Group	10.4		OBJ	Increasing development cannot lead to improvements in the environment.	The purpose of the objectives and policies is to ensure this does not happen.
Green Street Action Group	10.5		OBJ	Plan has not looked at energy reduction of existing development.	Covered in Policy CC1 (2).
Green Street Action Group	10.6		OBJ	Need a policy to stop "gated" developments.	Should only be done where particular harm can be demonstrated.
Staines Town Society	10.8		OBJ	It is not made clear how the public will be involved in the preparation of the SPD on Policy EN1 and other detailed policies.	This is made clear in the Council's Statement of Community Involvement.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Brixton PLC		EN1	SUPP	Brixton support the policy but recommend the first sentence be amended to read "The Council will require an appropriate standard of design and layout of new development".	Disagree. Important to emphasise a 'high' standard is required. This is consistent with PPS1.
SEERA		EN1	OBJ	The DPD would be improved by explicit reference to sustainable design and construction possibly in the policy title to bring consistency with terms use in the draft South East Plan.	The point is effectively covered by Policies EN1 and CC1.
Sport England South East		EN1	SUPP	Welcomes the policy to ensure high quality design to support safer and attractive communities. Draws attention to Sport England's recent guidance "Active Design" on incorporating recreational opportunities in new development.	Noted.
Staines Town Society		EN1	OBJ	Policy needs to be stronger to: 1. ensure more than "token" landscaping. 2. protect the character of neighbourhoods. 3. protect existing pockets of green space not covered by Policy EN4. 4. maximise opportunities for sustainable travel. 5. reflect changing attitudes to green issues and sustainable travel.	Points 1-3 are covered by reference to high standards of design. Sustainable travel dealt with in Policy CC2.
Shepperton Residents Association		EN3	OBJ	Air quality affected by road and air traffic to the extent it registers above acceptable trends on a regular basis.	The Council has commissioned extensive research over recent years. Of the seven pollutants the Council is required to monitor under the 1995 Environment Act two have degrees of exceedance in the Borough – NO <sub>2</sub> and PM <sub>10</sub> . The report 'Detailed Air Quality Assessment for Spelthorne' April 2006 (produced by CERC Ltd) and the Air Quality Progress Report 2007 project improvements in the period 2005-2010 showing for PM <sub>10</sub> very small areas of exceedance on the M25 and M3 for 2005 (Fig 11.5 page 35), and no exceedance in 2010 (Fig 11.6 page 36). Twenty-four hourly averages show areas of exceedance, but improvements from 2005 to 2010 (see Figs 11.7 to 11.10, pages 37-40). For NO <sub>2</sub> exceedance is confined in the main to the M25 and M3 and mainly within the carriageways with improvements from 2005-2010 (Figs 11.1 and 11.2, pages 31-32). The hourly average figures only show exceedance on the M25 with it virtually eliminated by 2010 (Figs 11.3-11.4, pages 33-34). Annual average levels of NO <sub>2</sub> and PM <sub>10</sub> by 2010 will be wholly below prescribed exceedance levels in Staines Town Centre,
Spelthorne Constituency Labour Party		EN3	OBJ	Plans to improve air quality and reduce carbon emissions need to be clarified.	
Staines Town Society		EN3	OBJ	Air quality problems in Staines Town Centre should be resolved by removing most through traffic by making Staines Bridge available only to local and public traffic.	
Highways Agency		EN3	OBJ	The sustainability appraisal should contain evidence as to the effect of development in the LDF on air quality.	
Green Street Action Group		EN3	OBJ	Inadequate research and use of existing data in the policy. Further development at Heathrow should be opposed. Areas should be defined where there will be no more housing development. PM <sub>10</sub> and PM <sub>2.5</sub> particulates should be measured.	
Councillor Ian Beardsmore		EN3	OBJ	Policy should place a moratorium on development in areas where the EU air quality standards for 2010 will not be met.	
Mrs Caroline Nichols		EN3	OBJ	EN3d is weak in referring to "other considerations".	

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

					<p>Sunbury and Shepperton but still exceeding in immediate areas around the M25. There are no urban areas where housing could go ahead where the two pollutants breach annual exceedence levels and there is no case for a moratorium or limitation of development. Measures to improve air quality further are set out in Policy EN3. This is no policy justification to limit the use of Staines Bridge on air quality grounds.</p> <p>The 'Air Quality Strategy for England, Scotland, Wales and NI', July 2007 Vol 1, is proposing to introduce targets for PM2.5 for the period 2010-2020, but they do not apply yet. The Council is nevertheless actively working toward introducing systems to monitor PM2.5. In Spelthorne research has shown that changes in levels of PM2.5 are broadly commensurate with PM10 levels and on the basis of this research monitoring is unlikely to identify patterns of PM2.5 significantly different from those for PM10 established by existing monitoring.</p> <p>Further information on air quality is set out in the Background Paper on Air Quality.</p> <p>The Transport Statement supports the Sustainability Appraisal and assesses the traffic impact of the LDF. It concludes that the plan itself should lead to a slight reduction of traffic which would in turn have a small related air quality benefit – this meets the Highway Agency's point.</p> <p>With reference to 'other considerations' in sub-point (d) of the policy, it will be for the Council to judge whether a 'weak' case is being made when it determines applications and it will be able to decide accordingly.</p>
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## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Persimmon Homes	10.22-10.24		SUPP	Supports the approach to open space, sport and recreation.	Noted.
Sunbury Common Residents Association (SCORA)		EN4	OBJ	Policy EN4 and area D3 in Appendix 1: Density of development in Kenyngton Drive must not be increased and the area protected by the LDF designate. Suggest north part of Beechwood Avenue/Ashridge Way is included as urban open space.	North part of Beechwood Avenue/Ashridge Way is a residential area with little integral open space and does not justify designation as an urban open space site. Density of any development that might take place in the future would need to be considered in the context of Policies HO5 and EN1.
Congregation Of the Sisters Of Charity Of St Paul The Apostle		EN4	OBJ	The relationship to Local Plan policy BE14 is unclear. The policy should take account of the present functional value of the area and if it is not used an alternative use should be found. The second part of the policy should allow for development on the whole of a site and an additional criterion (h) is proposed: "Where the present functional use has been abandoned and an open space or sport or recreational use can be provided in part or in whole on nearby land as g) above or alternatively in part on the existing site." The open space designation on the former tennis courts at The Ridings, Sunbury, should be deleted.	It is intended that once this DPD is adopted, 'saved' policy BE14 of the Local Plan will expire. The DPD already lists those Local Plan policies 'saved' beyond adoption of the DPD. The position is considered clear. Sub point (d) of the policy has been deliberately worded to refer to both 'existing' open space use or 'capability' of use so as to overcome the possibility that the use may be terminated, irrespective of need, simply to make a case that lack of use justifies a sites permanent loss. The policy already adequately sets out the tests of use, amenity value and the circumstances where some development may be acceptable. It provides an appropriate framework against which any proposals by the objector can be tested at the planning application stage. No evidence has been presented to demonstrate that the former tennis court area could not be used again for sport or recreation, if it were made available, and thereby justify amending the designation on the Proposals Map.
Thames Water		EN4	OBJ	The policy should be expanded to add an additional clause to avoid conflict with potential future operational development: "h) The open space designation is not intended to restrict potential plans of organisations such as Thames Water in carrying out their statutory functions".	This is unnecessary as it is clear from (d) that some sites may only have an amenity value rather than actual use for sport and recreation.
Staines Town Society		EN4	OBJ	Subsection (c) should also refer to safeguarding the existing rights-of-way network.	This comes within the scope of (c), which also applies to other non-statutory routes.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Sport England South East		EN4	SUPP	Pleased with the strong wording of the policy but would also like to stress the need to provide facilities for sport and recreation over and above open space and notes that there is no reference to indoor sport.	Sub-point (a) of the policy supports the provision of any additional space required and does not limit this to existing sites. Indoor sport comes within the scope of Policy CO1.
Persimmon Homes		EN4	OBJ	Supports the policy and adds that further land for open space should be identified in Lower Sunbury.	Support noted.
Natural England		EN4	SUPP	Supports the policy.	Noted.
Green Street Action Group		EN4	OBJ	Object to sub point (g) as all space should be safeguarded.	The sub-point is intended to cover the circumstances where acceptable alternative provision has been made and the existing site is not required.
Councillor Ian Beardsmore		EN4	OBJ	Site D3 in Appendix 1 should be extended to include the north part of the Beechwood Avenue/Ashridge Way, Sunbury as designated urban open space. There should be a requirement that there be no net increase in the built footprint of the area shown. In any part no replacement building should exceed the height of the building it is replacing.	North part of Beechwood Avenue/Ashridge Way is a residential area with little integral open space and does not justify designation as an urban open space site. Density of any development that might take place in the future would need to be considered in the context of Policies HO5 and EN1. Height of any replacement development would be considered in the context of Policy EN1 (a).
Shepperton Residents Association		EN4	OBJ	There is a limited amount of open space and all recreational land that is available needs to be safeguarded.	The sub-point is intended to cover the circumstances where acceptable alternative provision has been made and the existing site is not required and therefore retention could not be justified. (Also see comments above).
Mrs Caroline Nichols		EN5	OBJ	Policy should also protect more modern housing outside of Conservation Areas.	The policy is concerned only with buildings of architectural or historic interest, which does not preclude modern buildings so long as they are clearly of merit to justify statutory listing or inclusion on the Council's 'local list'.
Staines Town Society		EN5	OBJ	Policy should be amended to refer to the Council also using its legal powers to ensure listed buildings are kept in proper repair, thereby reflecting the text in paragraph 10.26.	Already covered in sub-point (e).

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Brixton PLC		EN6	SUPP	Brixton support the policy in relation to conservation areas, in particular the aim for ensuring that new development affecting conservation areas should contribute to its preservation and enhancement. Brixton supports the general approach that any development within or adjacent to a site of heritage value should not detract from its character or appearance.	Noted.
LaSalle Investment Management		EN6	OBJ	The wording of the policy and paragraphs 10.29 and 10.30 should be changed from "preserve and enhance" to "preserve or enhance" to be consistent with PPG15.	Whilst Section 69 of the Listed Buildings Act 1990 uses the term 'preserve or enhance' in relation to surveys of areas worthy of designation as conservation areas, Section 71 – which relates to the formulation of proposals for conservation areas - expressly refers to their 'preservation and enhancement'. Exercise of the duties under Section 71 is elaborated on in PPS 15. Those duties, when exercised across any conservation area will entail activities aimed at both preservation and enhancement, and it is correct for the policy to be phrased in a manner to reflect this.
Staines Town Society		EN6	OBJ	Local groups should be involved in planning policy for Conservation Areas and statutory consultees notified and involved.	This is already a statutory requirement as part of the LDF process. Any conservation enhancement plans will need to meet the requirements of Section 71 (2 or 3) of the Listed Building Act and, as the Council intend such plans to have the status of Supplementary Planning documents, they will also be prepared in accordance with the Council's Statement of Community Involvement as well.
Green Street Action Group		EN7	OBJ	Tree Preservation Order process needs to be speedier. Survey of all trees in Borough needed to identify where preservation should be concentrated and new planting planned.	This level of detail is inappropriate for this DPD.
Kempton Residents Association		EN7	OBJ	Preservation of trees should be a much higher priority. In spite of the fact that they are environmentally beneficial, far too many are being felled.	The policy already adequately expresses the Council's commitment to the protection of trees.
Mr Alan Weston		EN7	OBJ	A stronger policy is needed to refuse applications where tree felling has occurred on the site in the last two years.	Policy EN1 (d) already adequately identifies the account to be given to the retention of trees of amenity value. No addition is required to Policy EN7.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Shepperton Residents Association		EN7	OBJ	Tree Preservation Orders should be put on all trees in the Borough so permission is required to remove any of them.	To attempt to place a TPO on every tree in the Borough would be an enormous undertaking for which the Council does not have the resources. The Government publication 'Tree Preservation Orders: a Guide to the Law and Good Practice', April 2000, counsels discretion in promoting orders, advising them to be made when expedient in the interests of amenity and refers to account being taken of the risk to a tree, and the extent to which it is under good management. Use of the word 'appropriate' in the policy covers these considerations and no commitments of the type suggested should be added.
Natural England	10.33-10.37		SUPP	Supports the paragraphs.	Noted.
Green Street Action Group		EN8	OBJ	Need an additional sub-point to safeguard urban gardens.	Policy EN1 (b) already covers the amenity issues of new development and, by requiring a satisfactory relationship between buildings, determines the space between dwellings, much of which will be garden area. EN1 (d) deals with the landscape aspects of development, including gardens. EN8 covers landscape and biodiversity considerations. There is a need to make efficient use of urban areas (PPS 3, paras 45-51) and no case to preserve gardens per se beyond the above considerations.
Natural England		EN8	SUPP	Supports the policy.	Noted.
Green Street Action Group	10.41		OBJ	Replace "Walton Bridge" with "Shepperton Lock" (factual correction).	Agreed.
Brixton PLC		EN9	SUPP	Brixton support the policy approach to looking for opportunities to enhance the setting of the River Thames and its tributaries.	Noted.
Natural England		EN9	SUPP	Supports the policy.	Noted.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Sport England South East		EN10	SUPP	Welcomes the policy.	Noted.
Green Street Action Group		EN11	OBJ	Replace with existing Borough Plan Policy BE18, including reference to areas of special advertisement control and signs adjacent to highways.	Disagree. Existing Local Plan policy is both unnecessarily wordy and includes reference to an Area of Special Advertisement Control which was revoked in October 2006.
Green Street Action Group	10.45		OBJ	Need a Policy to build sound barriers and tree cover along the length of the M3 in Spelthorne.	The purpose of the policy is to identify actions the Council proposes to take to minimise the adverse impact of noise. It is unnecessary to identify sources of noise other than in the case of Heathrow where there are published noise contours and specific controls/measures based on guidance in PPG 24 'Planning and Noise'. The particular suggestion of noise barriers and tree planting along the length of the M3 through Spelthorne and at Stanwell and Stanwell Moor was not raised at the Preferred Options stage. Some planting has been carried out between the airport and Stanwell and Stanwell Moor as part of the Terminal 5 mitigation package. Whilst objective 4 of the plan and policy EN12 clearly express the Council's position in seeking to mitigate the adverse impacts of noise, a proposal for planting along the length of the M3 would need to be investigated thoroughly to establish not only its necessity along the entire length, but its feasibility and, importantly, sustainability particularly any adverse impact on flooding and visual impact. It would be unsound for the plan to make such a commitment in the absence of careful consideration of its feasibility.
Cllr Colin Strong		EN12	OBJ	Policy lacks reference to the M3 as a source of noise for residents living and working alongside it. (Also cross reference to Para 2.35).  Wants policy strengthened and green infrastructure to mitigate the effects of noise.	
Stanwell Liberal Democrats		EN13	OBJ	Planting of trees and other "green" measures should be referred to in the policy as a means to shield Stanwell and Stanwell Moor from noise generated by Heathrow.	

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Staines Town Society		EN13	OBJ	There should be a specific policy to resist further expansion of Heathrow Airport on the grounds of air quality and impact on climate change, and to maintain the air transport movement limit of 480,000.	The ATM limit is already covered in the policy. A general policy of resisting expansion could be judged as unreasonable as it would apply to the smallest changes – perhaps some with no impact on the Borough – and also fetter the Council's proper consideration of any specific proposal. The Council's position on issues such as climate change and air quality is nevertheless clear and would clearly be considerations in assessing any proposal.
BAA Heathrow		EN13	OBJ	Criteria (a) and (b) should be deleted. The Government's 2003 White Paper and 2006 Progress Report support additional runway capacity subject to meeting stringent environmental safeguards, particularly in relation to air quality and noise. Mixed mode operation and a third runway are two suggested measures for increasing capacity on which environmental impacts are being assessed through the Government-led "Project for the Sustainable Development of Heathrow" on which consultation is expected in late 2007. Both would exceed the 480,000 ATM and mixed mode operation is incompatible with segregated mode. The policy is pre-empting the outcome of the Government's studies and is inconsistent with national planning policy.	Parts of Spelthorne are severely affected by aircraft noise and, while the Council, has no control over the noise management regime, it has a legitimate interest on behalf of affected communities. The measures in (a) and (b) are existing controls intended to mitigate noise impact from Heathrow. In the absence of a final Government decision on further expansion it is not considered that a policy expressing support for existing control measures can be regarded as contrary to national policy.
Shepperton Residents Association		EN13	OBJ	Noise from lorries (particularly those carrying gravel) from the M3, and from aircraft, affect the quality of life.	The issue is already covered by Policy EN12 and EN13.
Staines Town Society		EN14	OBJ	Policy should specify (1) the use of fully downward directional lighting, and (2) should also refer to office blocks leaving lights on out of hours.	The first point is already covered in the policy. The Council cannot control the second issue.
Brixton PLC		EN16	SUPP	Brixton support the policy aimed at ensuring that where development is on land that may be affected by contamination, action is taken to ensure that the site is safe or will be made safe for its intended use.	Noted.
Mono Consultants Ltd		EN17	SUPP	Welcome and support the policy. It is consistent with national guidance in PPG 8.	Noted.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

CHAPTER 11 CLIMATE CHANGE AND TRANSPORT					
Respondent	Part No	Policy	Type	Summary of Representation	Response
Mr Stanley Talbot	11		OBJ	Infrastructure generally - inadequacy of Walton Bridge, Church Street, Staines and Clockhouse Lane, Ashford - cannot cope with more traffic.	Surrey County Council has proposals to replace Walton Bridge. Improvement of existing roads, where necessary and justified, is a matter for the County Council and to be set out in the Local Transport Plan.
Mrs Caroline Nichols	11		OBJ	Wants an all day through service by train from Sunbury to Richmond. General concerns on public transport provision. Council's plan has focused too much on transport in Staines.	Support for improvements generally for non-car based transport, including public transport, is set out in Policy CC2(a) and can be used to back any appropriate improvements. Specific reference to train services to Richmond is too detailed a proposal for the Plan and is more appropriate to the Local Transport Plan.
Fairview New Homes Ltd	11		OBJ	Transportation policies are too generalised (other than focussing on Staines' role as a transport interchange) and fail to properly address the cause and effects of climate change.	Disagree. They provide an appropriate policy framework.
Green Street Action Group	11.1		OBJ	Failure to recognise heat island effect of buildings and cooling effect of trees.	These are generally accepted facts and do not need stating in the Plan.
Green Street Action Group	11.6		OBJ	New development will not discourage car use. No evidence of existing road capacities, no assessment of public transport requirements or how to make it more attractive.	New development, by its location and use of such measures as travel plans and parking provision, provide an opportunity to influence travel patterns – see Policies CC2 and CC3. Some evidence of primary road capacity is set out in the Transport Statement as well as a general recognition in the plan of congestion, e.g. para 2.26, 2.34 and 11.7. The County Council hold more detailed information on road usage as the statutory 'Highway Authority'. Provision of further detail on capacities does not alter the need to reduce vehicle use for a range of reasons including air quality, climate change and health, and the necessity of the policies and approach in Chapter 11. In relation to public transport no suggestion is made as to how the policy could be further improved to achieve the outcomes.
Green Street Action Group	11.10		OBJ	There should be a Policy to avoid demolition of sound useable buildings in favour of refurbishment to avoid waste.	Such a suggestion could frustrate the need to meet future requirements but is likely to be done anyway where it is economic to do so.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Surrey County Council		SP7	SUPP	Supports the policy.	Noted.
Brixton PLC		SP7	SUPP	Brixton support the policy to minimise the impact of climate change. In particular, we support the approach that seeks to ensure that development is located in a way that reduces the need for travel and promotes alternative to car use.	Noted.
Home Builders Federation (HBF)		CC1	OBJ	Criteria (ii) and (iii) should be deleted and replaced with a general policy reference to compliance with the Code for Sustainable Homes should it become mandatory. The Council should not seek to pre-empt decisions on whether the Code becomes mandatory or the timetable for compliance.	The terms in which the Government has published the guidance and the way in which it builds on the well established Eco Homes guidance is such that the terms of the policy are appropriate. Housing Corporation grant funding, for example, is now conditional on developments - meeting at least Code 3. The Government has signalled its intentions to move to zero carbon development in due course and more recent guidance elaborates on this. Clearly any requirements must be viable – as required by PPS 22 para 8, but viability issues must consider projected energy savings and the Government’s intention to adopt challenging progress in this area.
WM Morrison Supermarkets PLC		CC1	OBJ	This policy is unduly onerous and should be subject to a caveat regarding viability. The policy conflicts with the intentions of Government guidance within PPS22 and its companion guide.	
Fairview New Homes Ltd		CC1	OBJ	Objects to the requirement to provide 10% of energy demand from on-site renewable sources and to the requirement to comply with the Code for Sustainable Homes which should remain voluntary. Part (1) of the policy should be deleted and replaced by a new point stating that on-site renewable energy would be considered on a site by site basis taking into consideration the viability of the scheme and the site's characteristics, for example land contamination and affordable housing.	The Government consultation document ‘Planning Policy Statement: Planning and Climate Change – Supplement to PPS 1’, December 2006 para 1.11, requires authorities in their DPDs to set policies on the provision of low carbon and renewable energy. It states the provision should be ‘significant’ and in the interim, before plans are adopted, require a standard 10%. In the absence of the Government having formally adopted the Statement and confirmed the exact manner in which its zero carbon objectives are to be achieved (whether mandatory, through Building Regulations, etc), Policy CC1 properly requires at least 10% on-site renewable energy. It is considered reasonable to refer to the Code for Sustainable Homes given the weight it is being accorded by the Government. Whilst Policy CC1 may require early review (as acknowledged in para 11.13) to reflect further development in Government policy, its requirements are appropriate.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Rugby Estates PLC		CC1	OBJ	The policy should include flexibility for the inclusion of new renewable technologies as they emerge and to take account of viability.	The policy does not preclude any.
Surrey County Council		CC1	SUPP	Supports the policy.	Noted.
Brixton PLC		CC2	SUPP	Brixton support the policy to promote sustainable travel. In particular, we support the approach to requiring development to be located where it will be accessible by non-car means of transport and where it will reduce the need to travel by car.	Noted.
Sport England South East		CC2	SUPP	Welcomes the policy.	Noted.
Staines Town Society		CC2	OBJ	There should be a general presumption against traffic generating development and only exceptionally allowing it where it meets the points in sub-point (d) i-v.	There can be no objection in principle to such development where the terms of point (d) can be met.
Surrey County Council		CC2	SUPP	Supports the policy but comments that it would benefit from being more specific in terms of developer contributions. It should state that developers will be obliged to fund/provide appropriate mitigation measures to accommodate the movement impact of a development. Also requests a reference to the need for a Transportation Assessment for all major development.	This is covered by Policy CO2 – but a cross reference could be made. It is unnecessary to state where TAs are needed as this is covered in Government guidance and those involved in major development are aware of the requirements.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Councillor Ian Beardsmore		CC3	OBJ	Objects to the policy because the Council's car parking standards have not been subject to public consultation and are in conflict with national and regional policy. (Rep had incorrectly referred to CC2).	The policy requires appropriate provision to be made for car parking and regard to a number of considerations including demand, scope for alternative means of travel, impact on highway safety and provision for those with disabilities. This is consistent with PPG 13 paras 17, 49-58). In February-April 2001 the Council consulted on revised parking standards to accord with the guidance in PPG 13 – those were adopted in June 2001. It had regard to the guidance in para 59-62 of PPG 3 which in general sought to reduce parking provision, in particular not setting minimum standards. The Council's standards were based on its own research. PPS 3 is less specific in its requirements for car parking than either PPG 13 or PPG3 but requires parking policies to take account of expected levels of car ownership, importance of promoting good design and need to use land efficiently. By addressing 'policies' rather than 'standards' it takes a broader approach. It requires such policies to be subject to consultation. The policies of this DPD have been subject to consultation. Both the DPD policies and existing standards are consistent with the relevant aspect of policy T7 of the draft South East Plan in that they are restraint based, set maximum standards, the B1 standard of 1.35-1.50m <sup>2</sup> is within the prescribed range of 1:30-1:100, ensures sufficient provision for cycling by setting specific standards. It is not for the Core Strategy Examination to assess the existing parking standards (which are in a separate document) but the DPD policies are sound and the standards are nevertheless consistent with published guidance.
Surrey County Council		CC3	SUPP	Supports the policy.	Noted.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Sunbury Common Residents Association (SCORA)		CC3	OBJ	Council's car parking standards need reviewing in consultation with the community.	Disagree. The policy requires appropriate provision to be made for car parking and regard to a number of considerations including demand, scope for alternative means of travel, impact on highway safety and provision for those with disabilities. This is consistent with PPG 13 paras 17, 49-58). In February-April 2001 the Council consulted on revised parking standards to accord with the guidance in PPG 13 – those were adopted in June 2001. It had regard to the guidance in para 59-62 of PPG 3 which in general sought to reduce parking provision, in particular not setting minimum standards. The Council's standards were based on its own research. PPS 3 is less specific in its requirements for car parking than either PPG 13 or PPG3 but requires parking policies to take account of expected levels of car ownership, importance of promoting good design and need to use land efficiently. By addressing 'policies' rather than 'standards' it takes a broader approach. It requires such policies to be subject to consultation. The policies of this DPD have been subject to consultation. Both the DPD policies and existing standards are consistent with the relevant aspect of policy T7 of the draft South East Plan in that they are restraint based, set maximum standards, the B1 standard of 1.35-1.50m <sup>2</sup> is within the prescribed range of 1:30-1:100, ensures sufficient provision for cycling by setting specific standards. It is not for the Core Strategy Examination to assess the existing parking standards (which are in a separate document) but the DPD policies are sound and the standards are nevertheless consistent with published guidance.
Fairview New Homes Ltd		CC3	OBJ	An additional point should be added: "Car parking standards will be negotiated on a site by site basis taking into consideration the individual characteristics of each development scheme".	Disagree. This could be seen as overriding the maximum standards which would be contrary to Government guidance.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Mrs Caroline Nichols		CC3	OBJ	Policy should include specific prohibition on underground car parks except in town centres.	PPG 3 seeks to secure the efficient use of land (para 45-51) and so does PPG 13 para 52. Where appropriate, parking underneath a building can help to achieve this. Any proposal must comply with the policies of the plan, particularly EN1. Where the requirement of the policies of this DPD is otherwise met there can be no reason in principle to object to underground car parks.
Ms Sandra Dodson		CC4	OBJ	Objects to Airtrack, particularly in view of the damaging effects on the town. Does not consider the proposal will have any real social or commercial benefit.	Airtrack is identified in the Regional Spatial Strategy and the Structure Plan. The Council is required to 'safeguard' the route to ensure conformity with strategic plans, hence the last sentence of policy CC4 and identification of the route on the submission Proposals Map. While SEERA and Surrey County Council have made representations, no "conformity" issue has been raised. Additionally no objection has been raised by GOSE or BAA, who have announced they will promote an application for the scheme. Paragraphs 11.19-11.23 explain the Council's concerns, which reflect the points raised by several of the respondents. The scheme has not yet been developed in detail and there is no evidence available to support assertions that in Spelthorne reductions in car use, access to Heathrow by employees or air quality will necessarily be improved. Deleting reference to considering alternatives is inappropriate given the proximity of the scheme to SPA sites, need for an Appropriate Assessment and absence of evidence there would be no 'significant effects'. Whilst para 11.20(a) refers to those living near the track in Staines, it is agreed the policy could also reflect this by adding the following words which would also meet the concerns of those living at Stanwell Moor – after 'Staines town centre' insert 'and those living near the track'. Specific requirements for green infrastructure in the policy at this stage, prior to a detailed scheme being formulated by its promoters and thoroughly assessed, would be premature. The policy does, however, already refer to 'effective mitigation'.
Sunbury Common Residents Association (SCORA)		CC4	OBJ	Scheme needs to consider the traffic impact on Staines Bridge and Thorpe Road. No specific change proposed.	
Surrey County Council		CC4	SUPP	Supports the approach of safeguarding for Airtrack. As the Structure Plan refers to Airtrack as a scheme in preparation rather than a policy commitment, no objection to the policy. Can be supported under Test of Soundness 4 concerning regard to relevant plans, policies and strategies. In the supporting text the reference in paragraph 11.20 to possible environmental impacts is supported, together with the reference to the Planning Brief in paragraph 11.21. Reference should be added in the supporting text to the potential benefits of Airtrack, including reducing car travel, improving access for the workforce and air quality improvements.	
Stanwell Liberal Democrats		CC4	OBJ	The Council should do more to protect the residents who live alongside the proposed Airtrack route - particularly Stanwell Moor. Tree planting and "other measures" are referred to.	
SEERA		CC4	OBJ	Reference to considering alternative options to Airtrack in the first instance should be removed and instead a contingency could be included requiring alternatives to be considered if more detailed assessments raise issues that cannot be mitigated. This amendment will ensure the plan implements this regionally significant transport scheme.	

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

Respondent	Part No	Policy	Type	Summary of Representation	Response
Mr Tony Davis		CC4	OBJ	<p>Line 3 of para 2 should be amended to read: "particularly on Staines Moor, Staines town centre and residential areas along the proposed Airtrack route are fully assessed".</p> <p>Airtrack will severely impact nearby residential areas due to noise and vibration from extra trains and from the new station, and also from increased demand for parking on local roads. (Also refers to adverse impact on house prices and saleability of houses)</p> <p>The track alongside Staines Moor will remove a very pleasant footpath and diminish the amenity of a Site of Special Scientific Interest and a Special Protection Area. Particularly concerned about the loss of the tree line shielding Staines Moor from the M25.</p>	See previous page.
Mr + Mrs Jonathan Hobbs		CC4	OBJ	<p>Object to the policy of safeguarding for Airtrack and consider that instead the Council should be opposing it because of the adverse impact on Staines town centre, Staines Moor and Staines residents living close to the railway.</p>	
Fairview New Homes Ltd		CC4	OBJ	<p>Core Strategy Policy CC4 is equivocal in its support or otherwise for Airtrack and Rail Access to Heathrow.</p>	
Cllr Colin Strong		CC4	OBJ	<p>Policy should require planning gain in the form of green infrastructure benefiting the residents of those communities directly affected by the rail link.</p>	
CPRE Surrey		CC4	SUPP	<p>Supports the emphasis on achieving an environmentally acceptable solution for public transport access to Heathrow and the specific position on Airtrack.</p>	
Ms Rosanna Suliani		CC4	OBJ	<p>Airtrack would have a damaging impact on residential areas adjoining the Windsor Line and Staines town centre. The second paragraph should be amended to read: "particularly on Staines Moor, Staines town centre and any residential areas along the proposed Airtrack route, are fully assessed".</p>	

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

CHAPTER 12 SPATIAL IMPLICATIONS OF CORE STRATEGY AND POLICIES					
Respondent	Part No	Policy	Type	Summary of Representation	Response
Government Office For The South East	12		OBJ	Could not readily find in the Sustainability Appraisal how the Council arrived at the proposed housing distribution and whether reasonable alternatives were tested.	The SA report considered the alternatives that were theoretically possible setting aside the nature of the policy constraints. The different geographic expressions of those policy options are described in pages 23-30 and supported by pages 9-91 in the Appendices to the SA. Each option is explicitly tested against the SA objectives. Pages 30-32 of the SA deal specifically with the rejected options. The Spelthorne Development Plan – Strategy and Policies Preferred Options (May 2006) comments further at Appendix 3 (pages 117-119) on the rejected strategies.
Persimmon Homes	12.19-12.22		OBJ	Concerned that only one site in Sunbury is included in the Allocations DPD (Riverside Works, Fordbridge Road) and that is not in the most sustainable location.	Consideration of the suitability of the site is for the Allocations DPD Examination.

## SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS

<b>OTHER MATTERS</b>					
Respondent	Document	Policy	Type	Summary of Representation	Response
Kempton Residents Association	Transport Statement		OBJ	The Transport Statement is unsound because it fails to consider the need to set up a Borough Transport Co-ordinating Committee to consider feedback and action on transport issues.	The purpose of the Statement was primarily to assess the impact of the two submitted DPDs on the Trunk Road network and whether there are likely to be any other significant effects. It is not a substitute for the County Council's Local Transport Plan and that documents role in setting out transport proposals and actions for the Borough.
Cllr Ian Beardsmore	Transport Statement		OBJ	Various comments on the inadequate scope of the Transport Statement. These include: traffic issues in Sunbury, concentration of secondary schools in Sunbury, access to St Peter's Hospital at Chertsey, Statement is primarily concerned with Trunk Road network, inadequate public transport in Sunbury, failed to map congestion on non-trunk roads, significance of thresholds for Transport Assessments, no mapping of transport noise - particularly around the M3.	The purpose of the Statement was primarily to assess the impact of the two submitted DPDs on the Trunk Road network and whether there are likely to be any other significant effects. It is not a substitute for the County Council's Local Transport Plan and that documents role in setting out transport proposals and actions for the Borough.
Mr John Carruthers	Rep Form		OBJ	Form is difficult to complete and making a representation requires reference to many documents.	The form is the standard one commended by the Planning Inspectorate. Referring people to the Council's evidence base and other relevant documents is considered helpful.
Mr John Carruthers	HLAA		OBJ	Failed to consider use of Green Belt and land at flood risk and ignored past 'over provision'. Concern it admits plan can provide more than is required.	The Assessment focussed on land which can be developed within existing policy constraints. Having established that needs can be met in the urban area other land did not need to be considered. The Council is not able to count any theoretical surplus of provision prior to April 2006. The surplus provides flexibility to ensure delivery of the required level of housing.
Mr John Carruthers	Housing Needs Survey		OBJ	Considers that the rent respondents who have said they can pay are understated, and housing needs is overstated.	The survey has taken account of people's stated incomes and housing costs, but the Council's Housing Market Assessment has, in Appendix B, assessed the sensitivity of the overall need to a number of factors.
Mr John Carruthers	Economy and Employ Land Survey		OBJ	Objects to the loss of employment sites for housing.	These are a small part of the overall employment stock (approx 6%) and more than compensated for in future employment commitments.

**SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS**