

**SPELTHORNE CORE STRATEGY AND POLICIES DPD
REPRESENTATIONS ON ALTERNATIVE SITE ALLOCATIONS**

July 2008

**Summary of Representations made to the Consultations on
Alternative Site Allocation Representations carried out in accordance with Regulation 32
from 13 September to 25 October 2007 and 6 May to 27 June 2008**

July 2008



SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS ON ALTERNATIVE SITE ALLOCATIONS

This summary of the main issues raised relates to those site allocation representations which proposed changes to designated areas shown on the submission Proposals Map or which related to policies included within the Core Strategy and Policies DPD. These include ASAs 3-7, which were consulted on from 13 September-25 October 2007 (first consultation) following submission of the Core Strategy and Policies DPD in June 2007, and ASAs 36-42, which were consulted on from 6 May to 27 June 2008 (second consultation) following the consultation on the Re-Advertised Core Strategy and Policies DPD in March/April 2008.

The summary includes some representations which contained general comments relating to all sites.

Where a large number of respondents made similar objections to a specific proposal they have been grouped together and summarised in one entry. In all other cases representations objecting to or supporting specific proposals are summarised individually.

The total number of representations received concerning matters to be considered in the Examination of the Core Strategy and Policies DPD was 85. Any representations submitted in relation to ASAs 1-2 and 8-35 which proposed alternative sites to be considered in the context of the Allocations DPD Examination are set out in a separate document.

SPELTHORNE CORE STRATEGY AND POLICIES DPD – SUMMARY OF REPRESENTATIONS ON ALTERNATIVE SITE ALLOCATIONS

| Customer Name | Policy Ref | Part no | Part Title | Policy Title | Comment Ref | Rep Type | Contributor Comments | Response |
|--|------------|---------|------------|--------------|------------------------|----------|--|---|
| Surrey County Council (first consultation) | | All | DOC | | C/DAII/00034/00005/001 | COMM | No objections. | Noted |
| Defence Estates (first consultation) | | All | DOC | | C/DAII/00243/00001/001 | COMM | No objections. | Noted |
| Thames Water (first consultation) | | All | DOC | | O/DAII/00004/00004/001 | OBJ | On the current information supplied by the developers/responders Thames Water is unable to make an assessment on the impact that these sites would have on its infrastructure. | None of the sites where it is proposed to change the designation of land would have any direct consequences for water resources, although any subsequent or resulting development proposals would need a Flood Risk Assessment where appropriate. The Council does not support any of the proposed changes to designated areas. |
| Thames Water (second consultation) | | All | DOC | | C/DAII/00004/00004/002 | COMM | Has no specific comments to make regarding the additional sites at this stage as it is difficult to comment due to the infinite number of combinations which could happen. | As above |

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| Highways Agency (first consultation) | | All | DOC | | C/DAII/00060/00005/001 | COMM | The potential impact of a change in designation and alternative use on the Strategic Highways Network has not been evaluated for any of the proposed sites. | None of the sites where it is proposed to change the designation of land would have any direct impact on the strategic highway network, although any subsequent or resulting development proposals would need to be fully evaluated. The Council does not support any of the proposed changes to designated areas. |
| Highways Agency (second consultation) | | All | DOC | | C/DAII/00060/00005/002 | COMM | Repeats previous concerns about sites being put forward where there appears to be no evaluation of the transport impact of the changes. | As above |
| Elmbridge Borough Council (second consultation) | | All | DOC | | C/DAII/00026/00003/001 | COMM | Has no further comment to make on the site allocations. | Noted |
| Government Office For The South East (second consultation) | | All | DOC | | C/DAII/00325/00003/001 | COMM | Has no comment to make on any of the sites. | Noted |

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| Environment Agency (second consultation) | | All | DOC | | C/DAII/00036/00002/001 | COMM | The Environment Agency has provided specific and general flooding comments on most of the sites included in the consultation setting out the SFRA implications if any of the alternative allocations were to proceed. | None of the sites where it is proposed to change the designation of land would have any direct consequences for flood risk, although any subsequent or resulting development proposals would need to be fully evaluated. The Council does not support any of the proposed changes to designated areas. |
| Surrey Chambers of Commerce | EM1 | ASA03 | Mimosa Court, Littleton Road, Ashford | Employment Development | O/EM1/00017/00002/001 | OBJ | Object to proposed loss of employment designation. Site ideal for small businesses - particularly offices which are in very short supply and needed to encourage the economic growth of the area. | Noted |
| Persimmon Homes (South East) Ltd | EM1 | ASA03 | Mimosa Court, Littleton Road, Ashford | Employment Development | O/EM1/00411/00008/004 | OBJ | No evidence to show the site's designation as part of an employment area is unsound and its loss could jeopardise the Borough's employment strategy. | Noted |
| Shepperton Residents Association | EM1 | ASA04 | Shepperton Centre | Employment Development | O/EM1/00727/00005/003 | OBJ | Wants to see the designated employment area retained as they do not want to see any further development of land in Shepperton. | Noted |

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| RPS Planning | EM1 | ASA04 | Shepperton Centre | Employment Development | O/EM1/00680/00002/003 | OBJ | Supports designation of Shepperton Centre for employment to meet local needs and maintain employment and economic growth. This is a sustainable location. | Noted |
| Persimmon Homes (South East) Ltd | EM1 | ASA04 | Shepperton Centre | Employment Development | O/EM1/00411/00008/005 | OBJ | No evidence to show the site's designation as part of an employment area is unsound and its loss could jeopardise the Borough's employment strategy. | Noted |
| Surrey Chambers of Commerce | EM1 | ASA04 | Shepperton Centre | Employment Development | O/EM1/00017/00002/002 | OBJ | Wants to see employment designation retained as the area is ideal for small business activity close to residential accommodation. | Noted |
| Shepperton Residents Association | EM1 | ASA05 | Littleton Lane Quarry, Littleton Lane, Shepperton | Employment Development | O/EM1/00727/00005/001 | OBJ | Object to proposed designation as no further industrial use should be allowed once restoration of land has taken place. | Noted |

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| Natural England | EM1 | ASA05 | Littleton Lane Quarry, Littleton Lane, Shepperton | Employment Development | O/EM1/00505/00003/001 | OBJ | Site is adjacent to the Shepperton Quarry SNCI and 2.44km from the South West London Waterbodies SPA. Bird species for which the SPA is 'notified' could be using the adjoining SNCI site. Consider proposal is likely to have a significant effect on the SPA. An Appropriate Assessment is required to look at the impacts of the proposal on SPA birds including the cumulative impacts from other plans and projects. (NB subsequent correspondence between the owner and Natural England has sought to clarify the need for Appropriate Assessment.) | The Council agrees that any proposals to redevelop the area for industrial development or to intensify activity on the site could require an assessment. The Council does not support any changes to the designation of this site. |
| RPS Planning | EN4 | ASA06 | St Paul's School, The Ridings, Lower Sunbury | Provision of Open Space, Sport and Recreation Facilities | S/EN4/00680/00002/001 | SUPP | Does not object to removal of the urban open space designation but only if it is used for educational or community purposes, and formally designated as such. | Noted |

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| 55 Respondents | EN4 | ASA06 | St Paul's School, The Ridings, Lower Sunbury | Provision of Open Space, Sport and Recreation Facilities | | OBJ | Object to change in designation and prospect of building development. Land forms a necessary and reasonable barrier between local housing and a school. The Council should compulsory acquire the site for public sports use. There is a continuing and growing need for educational services in the Borough. Loss of this designation would make the site vulnerable to more development. Local infrastructure is already overstretched and more development would result in increased traffic and strain on local services. Green Street area is over-developed resulting in increased noise, traffic and pollution. | Noted |
| Cllr Colin Strong | | ASA36 | Area around Beechwood Avenue, Sunbury Common | | S/DASA36/00726/00005/015 | SUPP | Supports the extension of the area of Protected Urban Open Space (proposed under ASA7). Area is known for its special character. | Noted. |

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| Cllr Robbie Colison Crawford | | ASA36 | Area around Beechwood Avenune, Sunbury Common | | S/DASA36/01336/00001/001 | SUPP | Supports increased protection for the whole Kenyngton Drive Area. The area suffers from access problems and flash flooding and cannot accommodate additional housing. It is essential that this award winning estate designed by Sir Basil Spence is protected. | Noted. |
| Mrs Brenda Webb | | ASA36 | Area around Beechwood Avenue, Sunbury Common | | O/DASA36/00949/00001/001 | SUPP | Supports the designation of the "River Gardens Estate" as a special character area. | Noted |
| Ms Kath Sanders | | ASA36 | Area around Beechwood Ave, Sunbury Common | | S/DASA36/01337/00001/002 | SUPP | Excluding the risk of inappropriate development will prevent reduction in amenity and the creation of a "special character area" has the potential to improve the environment in the longer term. | Noted |
| CEMEX | | ASA37 | Land at Vicarage Farm, Halliford Road, Sunbury | | S/DASA37/00720/00005/004 | SUPP | CEMEX support their own proposal to designate their site as Degraded Land and reiterate their original submission to the re-advertised Core Strategy and Policies DPD. | Noted |

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| Mr Gerald Edgar | | ASA37 | Land at Vicarage Farm, Halliford Road, Sunbury | | O/DASA37/01310/00001/006 | OBJ | Site is in the Green Belt and not needed to meet housing targets | Noted |
| Mr Donald Prance | | ASA37 | Land at Vicarage Farm, Halliford Road, Sunbury | | O/DASA37/00799/00001/006 | OBJ | Land does not appear to be degraded. Land cannot be considered as degraded unless it is impassable due to man made debris or heavily polluted. | Noted. No evidence has been submitted by the proposers of the site to support its designation as degraded land. |
| Ms Kath Sanders | | ASA38 | Sunbury Cross Employment Area | | S/DASA38/01337/00001/001 | SUPP | Deletion of the employment area designation would enable the redevelopment of unused office space, improve the local environment and reduce pressure on development of greenfield sites. | Noted |
| Mr and Mrs Gurney | | ASA42 | 91-105 Staines Road West Sunbury | | O/DASA42/01013/00001/001 | OBJ | Want to see Employment Area designation retained and also object to the proposed allocation of site for mixed use on grounds of parking issues, noise and privacy. | Noted |

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| Mr Patrick Brady | | SFRA | Flood Risk Areas | | S/DSFRA/01309/00001/001 | SUPP | Supports the proposed change to the flood risk maps provided the new zones are correctly described. Suggests that mapping should show range of risk not just the lower limit. | The flood risk maps are supplied by the Environment Agency and the Key to the Submission Proposals Map accurately describes their content. |
| Green Street Action Group | | SFRA | Flood Risk Areas | | O/SSFRA/00353/00003/001 | OBJ | Consider that to revert to the Environment Agency's mapping of flood risk will not allow consideration of surface water, groundwater or sewer overload. Comments on aspects of the SFRA. | The Council's SFRA has considered risks from all forms of flooding. The updated flood risk maps show the current risk from fluvial flooding and the Council is committed in the application of policy to use the latest available flood risk maps. It appears the objector has assumed that the Council is reverting to the older EA data, which is not the case. |
| Notcutts Ltd | | SFRA | Flood Risk Areas | | O/SSFRA/00003/00006/001 | OBJ | Concerned that the proposals map once adopted will be out of date and ineffectual very quickly. Potential development sites may be subjected to changing flood risk designations with the risk that housing land may be sterilised. Policy should be drafted to allow decisions to be taken on the facts at the time of the grant of planning permission. | Sites will always need to be assessed against the latest available flood risk information and the policy allows for that approach to be followed. The Key to the Submission Proposals Map also reiterates this point. |

