

Spelthorne Local Plan Sustainability Appraisal / Strategic Environmental Assessment

Draft Scoping Report

Table of Comments and Council Response

March 2017



Introduction

Spelthorne Borough Council consulted on the Sustainability Appraisal/Strategic Environmental Assessment Draft Scoping Report from 10th October 2016 to 7th November 2016. The comments received are set out in the following table, with a summary of each representation and the Council's response.

Table of Comments and Officer Responses - Sustainability Appraisal/Strategic Environmental Assessment Scoping Report

Comment Ref No	Verbatim Comment	Summarised Comment	SBC Response
00303/17/001	<p>Lower Sunbury Residents Association (LOSRA)</p> <p>LoSRA is encouraged by repeated references throughout the document to the importance of protection of the natural environment, including in particular leisure, the provision of health facilities, and the need to preserve air quality and maintaining a neutral impact on it and noise. Congestion is acknowledged to be a key contributor to air quality and should not be allowed to deteriorate even further. Indeed, if the 2020 targets are to stand any chance of being achieved, significant reductions will be required.</p> <p>We also note and strongly approve the references to Green Belt, and the requirement to protect and enhance it.</p> <p>Introduction & Methodology SA & SEA (P1)</p> <p>We are pleased to see that in para 1.8 confirmation that a separate Habitats Regulations assessment (HRA) will be undertaken which will look at the impact of the Local Plan on sites of biodiversity importance, including the SWL Waterbodies SPA (which includes the Kempton Park lakes) and Ramsar sites.</p> <p>The following comments focus principally on the ' Review of Baseline Data ', the identification of existing issues and problems and the Sustainability Framework.</p> <p>The 'Summary of Sustainability / Environmental Baseline' (Table 5)</p> <p>This is such a general and self-evident table composed mainly of truisms that it is really difficult to comment on and therefore we have mainly concentrated on the 'Issues and Problems' that follow under each topic area.</p>	<p>1. Lower Sunbury Residents Association (LOSRA)</p> <p>1.1 LoSRA is encouraged by repeated references throughout the document to the importance of protection of the natural environment.</p> <p>1.2 Congestion is acknowledged as a key contributor to air quality and should not be allowed to deteriorate even further.</p> <p>1.3 We note and strongly approve the references to Green Belt, and the requirement to protect and enhance it.</p> <p>1.4 Population & Community (P26) - It is significant to note, in the context of the OAN (522-757 p.a.), that Spelthorne [already] has a higher population density by some margin when compared to the SE and England as a whole.</p> <p>1.5 Transport (P36, para 3.50) – Although outside the Borough, Hampton Court Bridge should also be mentioned as it is a major generator of traffic funnelling through the Borough and is a major cause of traffic congestion.</p> <p>1.6 Para 3.56, Table 14 – This table has been superseded in several instances through Abellio's withdrawal of several routes. If not replaced this will lead to additional congestion from private car/ taxi use, with there being no practical link to Ashford St Peters Hospital or Heathrow Airport, which it is anticipate will provide many more employment and travel opportunities following the approval of a third runway.</p> <p>1.7 Para 3.59- The A308 from Sunbury Cross towards Hampton Court Bridge should be</p>	<p>1.1 - Comment noted.</p> <p>1.2 - Agreed. A key objective on page 11 is to encourage more sustainable travel to ensure that congestion does not deteriorate beyond current levels.</p> <p>1.3 – Comment noted.</p> <p>1.4 – Comment noted. Meeting the OAN and land availability will be assessed as Spelthorne develops its evidence base for the new local plan.</p> <p>1.5 – Para 3.50 to be updated to note the impact of Hampton Court Bridge on traffic in Spelthorne.</p> <p>1.6 - Table 14 to be updated.</p> <p>1.7 - Para 3.59 does not name specific areas with traffic congestion problems. This section is intended to highlight the overall issues and problems in the borough and identify potential future trends with the absence of a new local plan.</p> <p>1.8 – Table to be updated to note the impact of continued 'funneling' of traffic through the borough on traffic congestion.</p> <p>1.9 – Para 3.74 to be amended to note that Sunbury Health Centre was initially designed for 6,000 patients and reference to be made to the following text "Surrey Health Centre Patient</p>

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	<p>Population & Community (P26) It is significant to note, in the context of the estimates for future housing requirement in the SHMA, (522-757 p.a.) that Spelthorne [already] has a higher population density by some margin when compared to the South East and England as a whole.</p> <p>Transport (P36) (para 3.50) Although outside the Borough, Hampton Court Bridge should also be mentioned as it is a major generator of traffic funnelling through the Borough via the A308 from Sunbury Cross and as such is a major cause of existing traffic congestion on the A308.</p> <p>(para 3.56, Table 14) The table has been superseded in several instances through Abellio's withdrawal of several routes, which, if not replaced, will lead to additional congestion from private car/taxi use, there being no practical link to Ashford St Peters hospital, or Heathrow Airport, which it is anticipated will provide many more employment and travel opportunities following the approval of the 3rd runway.</p> <p>(para 3.59) Again the A308 from Sunbury Cross towards Hampton Court Bridge should be identified as an area with existing traffic congestion problems.</p> <p>(P40) ' Issue or Problem' Add continuing funnelling of traffic through the Borough to Heathrow, as stated above, but also via Sunbury Cross to the Thames bridge crossings at Hampton Court and Walton.</p> <p>Material Assets: Health Facilities (para 3.74) It is misleading to state that Sunbury Health Centre served a population of 14,000 in the 1970s when it was actually designed for 6,000 patients, particularly when it goes on to state the current registered patient population (18,000+) but doesn't mention the actual resident population. No mention is</p>	<p>identified as an area with existing traffic congestion problems.</p> <p>1.8 P40, 'Issue or Problem' - Add continuing funnelling of traffic through the Borough to Heathrow, but also via Sunbury Cross to the Thames bridge crossings at Hampton Court and Walton.</p> <p>1.9 Para 3.74- It is misleading to state that Sunbury Health Centre served a population of 14,000 in the 1970s when it was actually designed for 6,000 patients, particularly when it goes on to state the current registered patient population (18,000+) but doesn't mention the actual resident population. No mention is made of the fact that 55% of the building is currently unavailable to the practice.</p> <p>1.10 Page 46, 'Issue or Problem' – Does not highlight the significant level of existing problems, particularly at health centres – saying 'increased pressure' is inadequate.</p> <p>1.11 Para 3.109- we challenge the description of the Centre as being 'somewhat in decline'. If anything, it is a centre of regeneration.</p> <p>1.12 Para 3.158- No account is taken of the intended installation of the new air quality monitoring station at Sunbury Cross, which will enable more accurate measurements and address one of the concerns around data gaps (para 1.28).</p> <p>1.13 Page 65, 'Issue or Problem'- Point 2 should be more specific and read 'New development could exacerbate air quality impacts and should not be located near or where it could impact directly on air pollution hot spots'.</p> <p>1.14 Table 30, Objective 2, Indicators - Access to and Capacity of Health facilities - we recommend you add 'sustainability indicator should identify areas where no further development can be sustained</p>	<p>Participation Group expects 23,000 patients in 3 years. The practice only has access to 45% of the building and the rest is let to Virgin Health Care who provide a range of medical services" (LoSRA newsletter Spring 2016)</p> <p>1.10 – The 'Issue or Problem' table on page 46 is intended to give an overview of the main challenges in the borough. Paragraph 3.87 already notes the impact of a rising population on health services.</p> <p>1.11 - Para 3.109 to be updated to note the improvements occurring in the centre of Sunbury.</p> <p>1.12 – Add reference to the recently commissioned air quality monitoring station reinstallation in Sunbury Cross.</p> <p>1.13 - Suggested phrasing is prescriptive whilst this section is intended to provide an indication of the future baseline without the plan.</p> <p>1.14 – It is considered that the indicators already included are an appropriate measure of access to and capacity of health facilities. The indicator 'capacity to health facilities' will encompass the ability of centres to meet local need and will inform the direction of the emerging plan.</p> <p>1.15 – The indicators already included on access to education and school admission numbers are considered to suitability measure the sustainability of the emerging plan in terms of education and explicitly mentioning that major improvements will be required is not considered necessary. The indicators will point out whether the new Local Plan policies</p>

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	<p>made of the fact that 55% of the building is currently unavailable to the practice.</p> <p>Page 46 ' Issue or Problem' does not highlight the significant level of existing problems , particularly at health centres - e.g Sunbury Health Centre - saying 'increased pressure' is inadequate.</p> <p>Landscape & Townscape (para 3.101) We are pleased to note the acknowledgement of Kempton Park as 'a significant greenspace within the urban area'.</p> <p>(para 3.109) We challenge the description of The Centre as being 'somewhat in decline' - if anything, it is a centre of regeneration with a new gym, recently refurbished, high quality flats at 'The View', and national brands occupying the shopping units.</p> <p>Air (para 3.158) . No account is taken of the intended installation of the new air quality monitoring station at Sunbury Cross, which will enable more accurate measurement of air quality and particulate matter especially, and address one of the concerns around data gaps. (1.28)</p> <p>(page 65) 'Issue or Problem' - The second point should be more specific and read 'New development could exacerbate air quality impacts and should not be located near or where it could impact directly on air pollution hot spots'.</p> <p>4. Sustainability Framework (Table 30) Under 'Indicators'</p> <p>No 2 - Capacity of Health Facilities/ Accessibility to Hospital & GP Surgeries</p> <p>We recommend you add 'Sustainability indicator should identify areas where no further development can be</p>	<p>unless and until major improvements are implemented to existing facilities.</p> <p>1.15 Table 30, Objective 3, Indicators- there are similar issues with schools as for No 2.</p> <p>1.16 Table 30, Objective 8- The air pollution 'hotspots' should be clearly identified and future development should be avoided in areas which will adversely affect existing 'hot spots'.</p> <p>1.17 Table 30, Objective 13, Indicators- Traffic counts are not helpful as an indicator. An identification of areas of current high traffic congestion is needed.</p> <p>1.18 Table 30, Objective 13, Decision-aiding question- 'will it avoid contributing to congestion on the highway network?' is helpful but if the answer is no, then what? Would it not be clearer if the areas of significant existing traffic congestion were clearly identified and the 'Decision Aiding Question' and/or the 'Sustainable Objective' could then be to ensure that the location of future development avoids exacerbating these existing congestion areas.</p>	<p>help to fulfil the objective and will inform the policies required in the new local plan.</p> <p>1.16 - Objective 8 in the Sustainability Framework is intended to assess air quality across the borough and the indicators included are considered to assess air quality throughout Spelthorne, including 'hotspots' through an assessment of NO₂, PM_{2.5} and NO_x levels.</p> <p>1.17 – Traffic counts, as measured by the Department for Transport, use two methods of assessment including annual average daily flow (number of vehicles that will drive on that stretch of road on an average day of the year) and annual volume of traffic (total volume of traffic on the stretch of road for the whole year). These measures are considered to suitably assess the relative level of traffic on the roads and provide an indication of the amount of congestion present.</p> <p>1.18 - The Sustainability Framework sets out through its objectives, decision-aiding questions and indicators, a way of assessing local plan options/ policies in terms of sustainability. If an option does not, for example, avoid contributing to congestion, then other options will have to be assessed in terms of their sustainability in order for the plan to fulfil this criteria. Chapter 3 of the SA scoping report has already provided baseline information and has identified those areas which are most congested in the Borough. This will be taken forward when formulating the new Local Plan to ensure that the key issues/ problems in the Borough are addressed.</p> <p>Agree to the following factual changes:</p> <ul style="list-style-type: none"> • Update para 3.50 to include reference to the impact of Hampton

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	<p>sustained unless & until major improvements are implemented to existing facilities, e.g. Sunbury Health Centre'.</p> <p>No 3 School Admission numbers</p> <p>There a similar issue with schools as for No 2 above.</p> <p>No 8 'Objective' - 'To ensure air quality improves and pollution is reduced'</p> <p>In addition to just identifying the number of properties and land affected where air pollution exceed national targets , the air pollution 'hot spots ' should be clearly identified and future development should be avoided in areas which will adversely affect existing ' hot spots'</p> <p>No 13 'Objective' - To, inter alia, reduce road congestion</p> <p>Traffic counts on their own are not particularly helpful as 'indicators'. What is needed is identification of areas of current high traffic congestion, including Sunbury Cross and the A308 to Hampton and Hampton Court Bridge.</p> <p>No 13 'Decision Aiding Question - 'will it avoid contributing to congestion on the highway network' is helpful, but if the answer is NO, what then? Would it not be clearer if the areas of significant existing traffic congestion were clearly identified and the 'Decision Aiding Question' and / or the 'Sustainable Objective' could then be to ensure that the location of future development avoids exacerbating these existing congestion areas. This would respect the sustainable Local Plan objective 'to aim to either improve or ensure that congestion does not deteriorate below current levels'</p>		<p>Court Bridge on traffic in Spelthorne.</p> <ul style="list-style-type: none"> • Update Table 14 with latest bus services in the Borough. • Update table on Issues and Problems on page 40 to note the funnelling of traffic through the Borough. • Amend para 3.74 on the patient number capacity at Sunbury Health Centre and the forecasted increase in patients. • Amend para 3.109 to note the improvements occurring in Sunbury Cross Centre. • Para 3.158- Add reference to the recently commissioned air quality monitoring station reinstatement in Sunbury Cross.
00043/7/001	<p>Historic England</p> <p>- Green Belt Assessment Draft Methodology</p>	<p>2. Historic England</p>	<p>No comments. Consideration has been given to the guidance sent by Historic England in January 2016.</p>

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	<p>- Sustainability Appraisal/ Strategic Environmental Assessment Draft Scoping Report - Spelthorne Functional Economic Area Analysis Draft Report</p> <p>I am writing to confirm that at this stage Historic England has no comments to make on the above documents.</p> <p>In respect of the SA/SEA Draft Scoping Report, you may wish to refer to my comments to you in my letter dated 14 January 2016 in which I set out the range of matters Historic England would expect to see covered in an SEA/SA report.</p>	<p>I am writing to confirm that at this stage Historic England has no comments to make on the Sustainability Appraisal/ Strategic Environmental Assessment Draft Scoping Report.</p> <p>You may wish to refer to my comments to you in my letter dated 14 January 2016 in which I set out the range of matters Historic England would expect to see covered in an SEA/SA report.</p>	<p>No changes to be made.</p>
00019/5/001	<p>London Borough of Richmond upon Thames</p> <p>We have no comments to make on the SA/SEA Scoping Report.</p>	<p>3. London Borough of Richmond upon Thames</p> <p>We have no comments to make on the SA/SEA Scoping Report.</p>	<p>Noted.</p> <p>No changes to be made.</p>
01696/3/001	<p>Environment Agency</p> <p>We have reviewed the Sustainability Appraisal (SA) and Strategic Environmental Appraisal (SEA) Draft Scoping Report dated September 2016 with regards to our remit.</p> <p>In reviewing this document, we have focused on the key environmental issues within our remit, specifically those which we consider are likely to be significant.</p> <p>Our comments are set out below by environmental topic and are referenced to the relevant section of the Draft Scoping Report by page number and paragraph where possible.</p> <p>Biodiversity P. 56 Para. 3.133 We would recommend that a similar table to Table 22 is provided for all protected / priority species recorded</p>	<p>4. Environment Agency</p> <p>In reviewing this document we have focused on the key environmental issues within our remit, specifically those which we consider are likely to be significant.</p> <p><u>Biodiversity</u></p> <p>4.1 P.56, para 3.133 – We would recommend that a similar table to Table 22 is provided for all protected/ priority species recorded in the Borough and their population status/trend.</p> <p>4.2 P.56, para 3.131 and P.57, para 3.134 – We welcome the recognition that an update of the limited records regarding SNCIs will be required. We recommend a map of all priority habitats and SNCIs be provided.</p> <p>4.3 P.58- Issue or Problem –P.58 - Whilst we welcome the issues/ problems included, we</p>	<p>4.1 – Comment noted. Lack of information currently available on protected/priority species and their population in the borough. Further information to be included in para 3.135 where available.</p> <p>4.2 – Comment noted. Map to be included in regards to paras 3.131 and 3.134.</p> <p>4.3 – Whilst Table on page 58 already notes that there may be 'loss or damage to unprotected habitats', this will be updated to more specifically cover impacts on Green/Blue infrastructure. Mapping not currently available on Green/Blue infrastructure in the Borough.</p> <p>4.4 – Biodiversity baseline to be updated to cover non-native/invasive species.</p>

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	<p>in the Borough and their population status / population trend.</p> <p>P. 56 Para. 3.131 and P. 57 Para. 3.134 We welcome the recognition that an update of the limited records regarding Sites of Nature Conservation Interest (SNCI) will be required. We recommend that a map of all the priority habitat and SNCIs is provided.</p> <p>P. 58 Issue or Problem While we welcome the listed issues and problems we recommend that specific mention is made to the following issues also:</p> <p>Fragmentation and loss of connectivity between habitats and designated sites: Development has the potential to result in the loss, deterioration and fragmentation of the Borough's Green/Blue Infrastructure network, as well as in the loss of opportunity to expand/enhance it. This would have a consequent detrimental effect on the network's wildlife and recreation value, resulting in the loss of opportunity to offset the effects of climate change and provide multiple benefits which support human health and well-being.</p> <p>Spelthorne BC should aim to map existing Green/Blue Infrastructure and future opportunities for creating new green spaces and linking these through green/blue corridors such as rivers, hedgerows, roadside verges, parks, etc. A specific Green/Blue Infrastructure policy could help to avoid potential impacts on the Borough's Green/Blue Infrastructure.</p> <p>Non-native invasive species: We note that there is no mention of non-native invasive species and their potential spread. We recommend that your environmental baseline provides information on the invasive non-native species recorded within the Borough and their population status/trend. This will help inform the development of future policies and</p>	<p>recommend that specific mention is made to:</p> <p>Fragmentation and loss of connectivity between habitats and designated sites: development has the potential to result in the loss, deterioration and fragmentation of the Borough's Green/Blue Infrastructure network, as well as in the loss of opportunity.</p> <ul style="list-style-type: none"> - Spelthorne BC should map existing Green/Blue Infrastructure and future opportunities for new green spaces and linking through green/blue corridors. - A specific Green/Blue infrastructure policy could help to avoid potential impacts on the Borough's Green/Blue infrastructure. <p>4.4 Non-native species: We note that there is no mention of non-native species and their potential spread. Environmental baseline should provide information on the invasive non-native species in the Borough and their population status/trend.</p> <p><u>Water</u></p> <p>4.5 P.15, Table 4 – We welcome the objective to 'Protect the environment from adverse effects of waste and water discharges and enhance and prevent further deterioration of aquatic and wetland ecosystems'. If significant growth is proposed, then it is likely that you will be required to provide an assessment on environmental capacity and sewage treatment infrastructure capacity which would be taken into account through a Water Cycle Study (WCS). The EA has produced WCS guidance.</p> <p>4.6 The impact that increased waste from the proposed growth associated with the OAN will have on the receiving water bodies will need to be considered.</p> <p>4.7 This section should also consider threats to the ecological status of watercourses.</p>	<p>4.5 – Comment and EA guidance noted.</p> <p>4.6 –The 'Issue or Problem' table for waste on page 67 notes that waste levels may rise with additional households. The impact that potential growth will have on the environment will be considered further when appropriate, once development potential and land availability is known.</p> <p>4.7 – Paragraph 3.154 notes that flooding and pollution have arisen in the Borough and may continue into the future. The 'Issue or Problem' table on page 62 also covers water quality. Reference to be made to the potential threats to the ecological status of watercourses.</p> <p>4.8 – Table to be included on water bodies within Spelthorne and their status/ components.</p> <p>4.9 – Comment noted. Reference to be made to the 'Principal Aquifer' status in Spelthorne and the presence of the Chertsey source protection zone.</p> <p>4.10 – Comment noted. Reference to groundwater protection to be added in to 'water' section.</p> <p>4.11 – Comment noted. EA guidance on SPZs to be referred to at the appropriate stage of the Local Plan when allocating sites for development.</p> <p>4.12 – Comment noted. Sewage to be a consideration in all future development where appropriate, including gypsy and traveller sites, under the new Local Plan.</p>

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	<p>supplementary planning guidance which will assist developers in the control of non-native invasive species.</p> <p>Water</p> <p>P. 15 - Table 4</p> <p>We welcome the objective to 'Protect the environment from adverse effects of waste and water discharges and enhance and prevent further deterioration of aquatic and wetland ecosystems'. This is relevant for considering the potential impact of proposed growth on the status of water bodies within the borough. If significant growth is being proposed in your area, via the local plan process, then it is likely that you will be required to provide an assessment on environmental capacity, alongside sewage treatment infrastructure capacity. This would be taken into account through a Water Cycle Study (WCS) assessment.</p> <p>The Environment Agency has produced WCS guidance (enclosed), where we highlight that an assessment of the impacts on water quality and the Water Framework Directive (WFD) needs to be carried out if the growth proposed is larger than 5% of the local authority's existing population. We note that on page 45 'The joint Strategic Housing Market Assessment for Spelthorne and Runnymede indicates that for the period 2013 to 2033, there will be a need for between 522 and 757 dwellings per annum in Spelthorne'.</p> <p>From a water quality perspective the impact that increased effluent from this proposed growth will have on the receiving water bodies will need to be considered. This is to ensure development is compliant WFD objectives.</p> <p>In addition to the key water quality topics identified we recommend that this section also considers threats to the ecological status of watercourses. Some of the biggest threats to the water environment are</p>	<p>4.8 It would be helpful for this section to include a summary table of the water bodies within the Borough with a breakdown of the overall water body status into the components that make up the classification to identify which elements are failing. 2015 baseline waterbody classifications would be required as future change in status would be compared against this. Consideration could also be made for including the reasons for deterioration in each water body.</p> <p><u>Soil and Land</u></p> <p>4.9 Spelthorne is underlain by Principal Aquifers and part of the source protection zone for the public water abstraction at Chertsey is located within the western and southern parts of Spelthorne. The sensitivity of these water bodies should be factored into any planned development in the Borough.</p> <p>4.10 Whilst an emphasis has been put on remediation and protection of soil quality in this report, given the principal aquifer status of underlying aquifers and the potential risk of mobilising pollutants we would like to see the protection and remediation of groundwater given equal weight.</p> <p>4.11 There could be constraints on development especially within the inner source protection zone (SPZ1) and this should also be considered when allocating sites for development. Please refer to EA document 'Groundwater Protection: Principles and Practice' 2013 for restrictions of type of development in SPZ1.</p> <p>4.12 We would like to see provision of Gypsy and Traveller sites include connection to the foul sewer.</p> <p><u>Sustainability Framework</u></p>	<p>4.13 – Table to be updated to include green/blue infrastructure.</p> <p>4.14 – Indicator on extent and condition of priority species and habitats to be updated to cover the whole Borough. Add decision aiding question on Green/Blue infrastructure and connectivity.</p> <p>4.15 – Comment noted. Decision-aiding question on hydro-geomorphology to be added to objective 18.</p> <p>4.16, 4.17, 4.18 – Comment noted.</p> <p>Agree to the following factual changes:</p> <ul style="list-style-type: none"> • Further information to be added on protected/priority species. • Table on page 58 to be updated to cover Green/Blue infrastructure specifically. • Biodiversity baseline to be updated to cover invasive non-native species. • More information on potential threats to the ecological status of watercourses to be included. • Table to be included on water bodies in Spelthorne and their status/ components. • Reference to be added to principal aquifer in Spelthorne. • Reference to groundwater protection to be added. • Table 29 to be updated to include Green/blue infrastructure. • Indicator on extent and condition of priority species and habitats to be updated to cover the whole Borough under objective 10. Decision aiding

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	<p>encroachment/loss of the river corridor, disruption to natural river processes (e.g. as a result of hard bank revetment or construction of structures in the watercourse) and loss/fragmentation of aquatic habitat (e.g. as a result of culverting).</p> <p>Thames 21 are the catchment hosts for delivering WFD objectives in the Spelthorne Borough and are working with the Environment Agency to help deliver a catchment plan. Their catchment plan identifies projects which will help to improve the quality of the area's rivers and should be considered within this report. Please visit their website for more information: http://www.thames21.org.uk/the-maidenhead-to-teddington-catchment/</p> <p>It would be helpful for this section to include a summary table of the water bodies within the Borough which provides a breakdown of the overall water body status into the components that make up the classification (e.g. phosphate, fish, macrophytes etc.). This will clearly identify which elements are failing. In addition, providing the 2015 baseline water body classifications would be required as future change in status would be compared against this to identify deteriorations/improvements as part of the WFD's 'no deterioration' and achieving 'good' status targets. These can be obtained from the Environment Agency's Catchment Data Explorer: http://environment.data.gov.uk/catchment-planning/. Consideration could also be made for including the reasons for deterioration/failure in each water body to highlight the current pressures on the water bodies.</p> <p>Soil and Land</p> <p>The entire borough of Spelthorne is underlain by flood plain sands and gravels (Kempton Park; Taplow; Maidenhead and Shepperton Gravel Formations). Since groundwater is abstracted from this drift geology for the public water supply, these aquifers are</p>	<p>4.13 P.69, Climate Change issue or problem – We recommend that the Local Plan should ensure that green/blue infrastructure is protected and enhanced to address the impacts of climate change on biodiversity.</p> <p>4.14 P.74, Issue 10 – one of the indicators focuses on the extent and condition of priority and protected species and habitats in BOAs. This should cover the whole of the borough. The following decision-aiding question should be added “will it protect the Borough’s green/blue infrastructure and enhance connectivity?”</p> <p>4.15 P.79, Objective 18 - This should aim to ensure no deterioration and to reach good ecological status of the Borough's waterbodies. We recommend the addition of the following decision aiding question: 'Will it protect and improve hydro-geomorphology and the overall ecological status of the watercourse?'</p> <p><u>Flood Risk</u></p> <p>4.16 We are pleased that flood risk has been acknowledged in the document and welcome the related objectives for the Local Plan to include policies that will facilitate the reduction of flood risk.</p> <p>4.17 We are pleased our previous comments on the document have been taken on board and that the revised climate change allowances will be considered within the preparation of the local plan and that the borough's SFRA is to be updated.</p> <p>4.18 We are pleased to note that our previous comments regarding the River Thames Flood Alleviation Scheme have been considered in this document. In particular, the addition of a reference to the funding status (Paragraph 3.121) and also the inclusion of the River Thames Scheme as a</p>	<p>question to be added on Green/Blue infrastructure and connectivity.</p> <ul style="list-style-type: none"> Decision-aiding question on hydro-geomorphology to be added to objective 18.

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	<p>classified as Principal Aquifers. In addition, part of the source protection zone for the public water abstraction at Chertsey is located within the western and southern parts of Spelthorne Borough. Furthermore, the River Thames (base fed by groundwater from the sands and gravels) flows along the western and southern boundary of the Borough. The sensitivity of these water bodies should be factored into any planned development in the Borough.</p> <p>Whilst we appreciate that consideration is given in this report for developments over brownfield sites (where there is history of potentially contaminative use) an emphasis has been put on the remediation and protection of soil quality within the Borough. Given the Principal Aquifer status of the underlying aquifers and the potential risk of mobilising pollutants (that could impact on these Principal aquifers) we would like to see the protection and remediation of groundwater given equal weight in this document.</p> <p>There could be constraints on development especially within the inner source protection zone (SPZ1) and this should also be considered when allocating sites for development. Please refer to Environment Agency document 'Groundwater protection: Principles and practice (GP3) August 2013 Version 1.1 for the restrictions on the type of development within a SPZ1.</p> <p>We are pleased to see that our previous comments, about the need for the infrastructure for foul water to be in place ahead of new developments, have been documented in the report. Given the sensitivity of the underlying Principal Aquifers we would also like to see provision for Gypsy and Traveller sites include connection to the foul sewer.</p> <p>Sustainability Framework</p> <p>P. 69</p>	<p>Programme on the list of policies and programmes.</p>	

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	<p>With regards to the Climate Change Issue or Problem, we recommend that the Local Plan should ensure that green/blue infrastructure is protected and expanded/ enhanced to address the impacts of climate change on biodiversity.</p> <p>P. 74 - Issue 10 One of the indicators for this objective is the extent and condition of priority and protected species and habitats in BOAs. This should be amended to include the whole of the Borough, not just BOAs. We recommend that the following decision aiding question is added: 'Will it protect the Borough's green/ blue infrastructure and enhance connectivity?'</p> <p>Page 79 - Objective 18 This objective should aim to ensure no deterioration and to reach good ecological status of the Borough's waterbodies. We recommend the addition of the following decision making question: 'Will it protect and improve hydrogeomorphology and the overall ecological status of the watercourse?'</p> <p>Flood Risk</p> <p>We are pleased that flood risk is mentioned throughout this document and that it is recognized that large areas of the Borough are at significant flood risk, and that climate change may lead to an increase in this risk. We welcome the related objectives of the document for the local plan to include policies that will facilitate the reduction in flood risk from all sources throughout the Borough.</p> <p>We are pleased that our previous comments on the document have been taken on board and that the revised climate change allowances will be considered within the preparation of the local plan and that the borough strategic flood risk assessment will be updated to form part of the evidence base for the local plan document. This will ensure that the policies within</p>		

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	<p>the local plan are much more robust as they are based on the most up to date flood risk information.</p> <p>In addition, we are pleased to note that our previous comments regarding the River Thames Flood Alleviation Scheme have been considered in this document. In particular, the addition of a reference to the funding status (Paragraph 3.121) and also the inclusion of the River Thames Scheme as a Programme on the list of policies and programmes.</p>		
01868/1/001	<p>Capita</p> <p><u>Effective Use of Previously Developed Land</u> It is vital that the new Local Plan prioritises new development on available brownfield sites / previously developed land. To fully maximise the best use of land, it is recommended that this approach is adopted regardless of whether the site is located in an urban area or the Green Belt.</p> <p>This is in accordance with approach promoted in NPPF Para 17 which states "encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value". In addition, this approach is also supported NPPF Para 89 Bullet 6, which states that that development within the Green Belt which may be considered as acceptable in the context of "very special circumstances", including "Limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development".</p> <p>The SA Page 15, in relation to Land & Soil, comments that: "The Local Plan should seek to protect the best and most versatile agricultural land and protect soil quality more generally. Priority should be given to</p>	<p>5. Capita</p> <p>5.1 The new Local Plan should prioritise new development on brownfield sites/ previously developed land (PDL), regardless of in the Green Belt or Urban area.</p> <p>5.2 Pg.15, Soil and Land – states that 'the Local Plan should seek to protect the best and most versatile agricultural land and protect soil quality more generally. Priority should be given to developing and making the most efficient use of PDL...' Redeveloping small scale industrial sites or land to residential land uses in sustainable locations might assist with achieving this objective.</p> <p>5.3 Support for objective 6, Pg. 72 'to make the most effective and efficient use of PDL and existing buildings'. It is suggested that key examples of such sites would include existing brownfield sites available for development.</p>	<p>5.1 – Objective 6 of the SA framework sets out "to make the most efficient use of PDL and existing buildings". Scope for development will be explored at an appropriate stage of the Local Plan review.</p> <p>5.2 – Comment noted. Spelthorne BC will be exploring all potential brownfield sites with development potential as part of the Strategic Land Availability Assessment as part of the evidence base to support the new Local Plan.</p> <p>5.3 – Support noted. No changes to be made.</p>

Comment Ref No	Verbatim Comment	Summarised Comment	SBC Response
	<p>developing and making the most effective use of previously developed land, especially that of lower environmental quality and where this could help remediate/mitigate contaminated sites". Redeveloping small scale industrial sites or land to residential land uses in sustainable locations might assist with achieving this objective.</p> <p>"Sustainability objectives should be developed which seek to protect soil quality especially best and most versatile agricultural land and prioritise the efficient re-use of previously developed land".</p> <p>Therefore the objective "To make the most effective and efficient use of previously developed land and existing buildings" (SA Page 72) is supported. It is suggested that key examples of such sites would include existing brownfield sites available for development.</p>		
00029/3/001	<p>Mole Valley District Council</p> <p>We have no comments to make.</p>	<p>6. Mole Valley District Council</p> <p>We have no comments to make.</p>	<p>Noted.</p> <p>No changes to be made.</p>
01805/2/001	<p>Highways England</p> <p>Thank you for your correspondence of the 10th of October inviting Highways England to comment on your Local Plan Review Evidence Base Documents which include:</p> <ul style="list-style-type: none"> o Green Belt Assessment - Draft Methodology o Sustainability Appraisal/Strategic Environmental Assessment Draft Scoping Report and, o Spelthorne Functional Economic Area Analysis Draft Report. <p>In addition, thank you for inviting Highways England to identify and offer potential housing and economic development sites for inclusion in the SLAA.</p>	<p>7. Highways England</p> <p>7.1 The Strategic Road Network is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in terms of current needs and long term operation and integrity.</p> <p>7.2 Our interest is in the council's approach to highway and transport matters in relation to regeneration and new development. We are keen to understand how local authorities initially identify and prioritise transport improvements in order to deliver sustainable development.</p> <p>7.3 Highways England will be concerned that the cumulative effect of development proposals</p>	<p>7.1, 7.2 – Comment noted.</p> <p>7.3 – Comment noted. Paras 3.47- 3.63 set out the transport baseline in the Borough and Objective 13 of the sustainability framework focuses on transport so that all options and policies for the new Local Plan can be best considered to address the issues and problems set out previously in the document.</p> <p>7.4 – Support noted.</p> <p>7.5, 7.6 – Comment noted.</p> <p>7.7 – Comment noted. Sustainability is a key theme running through the NPPF and the new</p>

Comment Ref No	Verbatim Comment	Summarised Comment	SBC Response
	<p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>Our interest in such Strategy documents is specifically focussed on the council's approach to highway and transport matters in relation to regeneration and new development. We are keen to understand how local authorities initially identify and prioritise transport improvements in order to deliver sustainable development. Specifically how local authorities set and implement policy to manage trip demands and ultimately how these might affect the safe and efficient operation of the Strategic Road Network for which we are responsible. Highways England will be concerned that the cumulative effect of development proposals have the potential to impact on the safe and efficient operation of the SRN, in this case the M25 J13 and 14, M3 J1, the A30, A316 and the A3113 all of which are either adjacent to or within the councils boundary.</p> <p>It is noted and welcomed that the council are intending to take an active approach to sustainable public transport to better manage demand on the highway network for the movement of people and goods. This approach is preferred against the initial building of new infrastructure which should be viewed as a final resort. It was interesting to note that a substantial proportion of the boroughs working populous commute out for work and are clearly drawn to neighbouring London Boroughs of Hillingdon and Hounslow due to the employment linked with Heathrow. The councils desire to strengthen the public transport links between itself</p>	<p>have the potential to impact on the safe and efficient operation of the SRN (M25, M3, A30, A316, A3113).</p> <p>7.4 It is noted and welcomed that the council are intending to take an active approach to sustainable public transport. This approach is preferred against the initial building of new infrastructure which should be viewed as a final resort.</p> <p>7.5 It was interesting to note that a substantial proportion of the borough's working populous commute out for work and are clearly drawn to employment linked with Heathrow.</p> <p>7.6 The council's desire to strengthen the public transport links to Heathrow is appropriate as this is likely to reduce the dependence on car travel.</p> <p>7.7 The council's aspiration to create more employment is appropriate and this should provide beneficial effects on the public highway by reducing the amount of in/out commuting. Locating housing near public transport or adjacent to employment sites should be beneficial to the highway network if walking and cycling improvements are also delivered as part of the development packages.</p> <p>7.8 As car ownership is unlikely to reduce over the period of the Local Plan it is essential that sustainable public transport is developed and promoted.</p> <p>7.9 The council will need to provide sufficient evidence to demonstrate that its proposals have no residual severe impacts on the operation of the SRN or provide highway proposals to mitigate such impacts to an acceptable level.</p>	<p>Local Plan will balance environmental, social and economic needs. The Sustainability Framework objectives, in particular, 13, 14 and 15, work towards achieving this and allowing the most suitable options and policies to be identified.</p> <p>7.8 – Comment noted. Objective 13 of the Sustainability Framework seeks to promote sustainable travel.</p> <p>7.9 – Comment noted and agreed. When assessing options and policies the council will work towards identifying the most sustainable effects of the local plan and ensure that adverse effects are minimised, in accordance with the sustainability framework.</p> <p>No changes to be made.</p>

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	<p>and Heathrow is appropriate as this is likely to reduce the dependence on car travel which is currently the Boroughs primary means of transport with overall car ownership likely to remain high. Strengthening public transport links between Heathrow and Spelthorne could become essential should a third runway at Heathrow proceed which at present seems likely.</p> <p>The councils aspiration of creating more employment for its residents is appropriate and this should provide beneficial effects on the public highway by reducing the amount of commuting in and out of the Borough, this shift however will likely be gradual over a longer period of time. Locating housing within easy reach of public transport or adjacent employment sites should again be beneficial to the highway network particularly if walking and cycling improvements are also delivered as part of the development packages. As car ownership is unlikely to reduce over the period of the Local Plan it is essential that sustainable public transport is developed and promoted as far as is practicable to provide commuters with a viable alternative means of daily transport.</p> <p>However, even with a heavy emphasis on public transport initiatives there is still the potential for residual adverse impacts on the highway network. Therefore, the council will need to provide sufficient evidence to demonstrate that its proposals have no residual severe impacts on the operation of the SRN or provide highway proposals to mitigate such impacts to an acceptable level.</p> <p>Finally, in relation to your call for sites Highways England have not identified any potential housing and economic development sites for inclusion in the SLAA at this time.</p>		
00313/14/001	Staines Town Society	8. Staines Town Society	8.1- Support noted.

Comment Ref No	Verbatim Comment	Summarised Comment	SBC Response
	<p>Staines Town Society applauds the virtuous aims and objectives in sec 2 of the scoping report, and hopes they will be adopted in the Appraisal - and achieved.</p> <p>We will be delighted to present the Planning dept with a Staines Town Society plaque if sulphur dioxide is reduced by 82% by 2020.</p>	<p>8.1- Staines Town Society applauds the virtuous aims and objectives in section 2 of the scoping report and hopes they will be adopted in the Appraisal – and achieved.</p> <p>8.2- We will be delighted to present the Planning dept. with a Staines Town Society plaque if sulphur dioxide is reduced by 82% by 2020.</p>	<p>8.2- The 82% noted in Table 4 under Air Quality is taken from the European Commission Thematic Strategy on Air Pollution, which supplements current legislation.</p> <p>No changes to be made.</p>
01825/1/001	<p>Redrow Homes</p> <p>The SA/SEA scoping report is the first stage of a process that is an integral part of local plan preparation. It considers relevant plans/policies/programmes and the baseline context allowing issues and problems to be identified, which have informed the nineteen SA/SEA objectives that will be taken forward to the SA/SEA.</p> <p>Table 5: Soil and Land - notes the recent trend that 94% of development in 2014/15 came forward on previously developed land and that this percentage could increase in the future. We would contend that this position is not robust or substantiated until the land supply position is known. Indeed, it is highly likely that a significant proportion of development will need to come forward on greenfield land if the OAN for housing is to be met.</p> <p>Paragraph 3.85 includes reference to the SHMA for Spelthorne 2013-2033 and the need for "between 522 and 727 dwellings per annum in Spelthorne". This needs to be updated to '552 - 757'.</p> <p>Paragraph 3.91 "There are an above average proportion of listed buildings within the borough of Spelthorne, with percentages in each grading above that of the national stock." This statement is misleading and does not reflect the information presented in table 20.</p>	<p>9. Redrow Homes</p> <p>9.1- Table 5: Soil and land – notes that 94% of development in 2014/15 came forward on PDL and could increase in the future. This position is not robust or substantiated until the land supply position is known. It is highly likely that a significant proportion of development will need to come forward on Greenfield land if the OAN is to be met.</p> <p>9.2- Para 3.85 includes reference to the SHMA for Spelthorne 2013-2033 and the need for "between 522-727 dwellings p.a. in Spelthorne". This needs to be updated to '552-757'.</p> <p>9.3- Para 3.91 - The statement comparing the proportion of listed buildings to the national stock is misleading when compared to Table 20.</p> <p>9.4- Para 3.101 – "Kempton Park is present on the eastern periphery of the borough and is also identified as a significant greenspace within the urban area". We disagree with the evaluation of this area in respect to the assertion that there are only glimpsed views of racecourse buildings and the site is a rural or natural area. The racecourse and other built features are distinct detracting features and there is no public access.</p>	<p>9.1 – Latest information available has been used in the SA scoping report to show the current and likely future trends in the absence of the new Local Plan. In 2015/16 97% of new and converted dwellings came forward on PDL, indicating a strong trend towards brownfield development. Report to be updated to reflect this. Once land availability has been identified this will be fed into the Local Plan where appropriate, however at this stage this is beyond the scope of the report.</p> <p>9.2 - Para 3.85 OAN to be corrected from '522 and 757' to '552 and 757'.</p> <p>9.3 – Para 3.91 to be amended to state that there is an above average proportion of Grade II and Grade II* listed buildings in Spelthorne when compared to the national stock but a slightly lower proportion of Grade I listed buildings.</p> <p>9.4 – The description of Kempton Park as set out in the Surrey Landscape Assessment provides factual documented information. The 'significant greenspaces within urban areas' are defined as providing a visual and physical break of rural or natural open character within the Built Up Area. These areas provide open</p>

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	<p>Paragraph 3.101, referencing the Surrey Landscape Character Assessment (LCA): Spelthorne Borough (2015), Surrey County Council notes "...Kempton Park is present on the eastern periphery of the borough and is also identified as a significant greenspace within the urban area." We disagree with the evaluation of this area within the LCA in respect to assertion that there are only glimpsed views of racecourse buildings and the site is a rural or natural area. The dominance of the racecourse buildings (and associated infrastructure) and other built features, including the railway line, are distinct detracting features and there is no public access to the site.</p> <p>Consideration of Kempton Park in the context of the SA/SEA objectives:</p> <p>The Kempton Park site will be able to provide up to 1,500 dwellings, with of a mix of tenures and a proportion of affordable homes and specialist accommodation. This site would deliver housing numbers equivalent to up to three years of the borough's housing numbers (as set out in the SHMA), a significant step towards meeting objective 1.</p> <p>Development at Kempton Park will include public open space, recreational facilities and a cycle and pedestrian link to Kempton Park station. There is also potential for local healthcare facilities to be provided within the new local centre. The proposed development will benefit the health and well being (objective 2) of future residents and the existing population in the surrounding area who can make use of the facilities.</p> <p>The carefully designed development at Kempton Park will provide sustainable provision of new affordable homes, community facilities and primary school on the Kempton Park site (contributing to objectives 3 and 4).</p>	<p>9.5- The representation goes on to promote the Kempton Park site in relation to the Sustainability Framework objectives.</p>	<p>space in direct contrast to the surrounding dense urban areas. The Kempton Park area must be considered as a whole and not just the racecourse.</p> <p>9.5 – Noted. Not relevant to SA scoping report.</p> <p>Agree to the following factual changes:</p> <ul style="list-style-type: none"> • Para 3.85 OAN to be corrected from '522 and 757' to '552 and 757'. • Amend para 3.91 to note the proportion of listed buildings in Spelthorne compared to the national level.

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	<p>To reduce the risk of and minimise the harm from flooding (objective 5), the Kempton Park master plan will respond to existing flood data and implement a drainage strategy, incorporating sustainable drainage elements where feasible, to ensure the requirements set out by the Environment Agency are fully met.</p> <p>The majority of the Kempton Park site has been worked for sands and gravel (extraction ceased in 1992). Following this time the excavated areas were infilled with made ground formed from bricks, concrete, clinker, ceramics, wood and plastic fragments, with hydrocarbons and asbestos also present in some areas. The development of this site will require implementation of an appropriate remediation / mitigation strategy which will assist in meeting objective 7 to reduce land contamination in the borough.</p>		
00031/3/001	<p>Tandridge District Council Firstly, Tandridge District Council (TDC) acknowledges and welcomes the opportunity to have effective and ongoing dialogue under the duty to cooperate with Spelthorne Borough Council.</p> <p>TDC prepared a Duty to Cooperate Scoping Statement 2014, and a Duty to Cooperate Statement Update 2015 that sat alongside the TDC Regulation 18 Local Plan that was published for consultation between 18 December 2015 and 26 February 2016. A further iteration of the DtC Statement Update has been prepared to accompany the Local Plan: Sites Consultation which commenced public consultation on 4th November 2016.</p> <p>TDC's scoping statement provides a good foundation to direct and discuss strategic matters with the relevant bodies. As TDC continue to prepare their Local Plan, the Duty to Cooperate statement will be updated to reflect how things have progressed. It is intended that</p>	<p>10. Tandridge District Council</p> <p>10.1- In our Duty to Cooperate Scoping Statement 2014, we identified that the only strategic issues between Tandridge and Spelthorne are housing and traveller needs.</p> <p>10.2- It is acknowledged that Spelthorne and Tandridge sit at opposite sides of the county; we are still committed to ensuring further consultation takes place under the Duty to Cooperate. Emerging evidence gathering for our Local Plan is demonstrating that meeting our full OAN will be challenging. Should any opportunity assist us in doing so, arise, we would very much welcome this and be happy to discuss.</p> <p>10.3- Tandridge District Council have shared sustainability objectives with East Surrey and we would suggest ensuring there is a joined up approach to sustainability and the</p>	<p>Comments noted. Spelthorne will continue to work will all Surrey authorities under the Duty to Cooperate to align Local Plan approaches where possible.</p> <p>No changes to be made.</p>

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	<p>this will be done at each regulation stage to reflect the discussions had and mechanisms put in place through each regulation stage.</p> <p>In our Duty to Cooperate Scoping Statement 2014, we identified that the only strategic issues between Tandridge and Spelthorne are housing and traveller needs.</p> <p>It is acknowledged that Spelthorne and Tandridge sit at opposite sides of the county; we are still committed to ensuring that further consultation takes place under the Duty to Cooperate and we will be willing to attend any meetings in the future as necessary. Emerging evidence gathering for our Local Plan is demonstrating that meeting our full OAN will be challenging. Whilst we are taking every necessary step to try and meet our needs, should any opportunity to assist us in doing so, arise, we would very much welcome this and be happy to discuss.</p> <p>Sustainability Appraisal:</p> <p>In relation to the Sustainability Appraisal, please note that Tandridge District Council have shared sustainability objectives with East Surrey and we would suggest ensuring there is a joined up approach to sustainability and the assessment of it, across the county as far as is practicably possible.</p>	<p>assessment of it, across the county as far as is practicably possible.</p>	
01867/1/001	<p>Mr Andrew McLuskey United Reformed Church</p> <p>In the section on Air Quality you say: 'The SW London Waterbodies SPA and Ramsar in Spelthorne has current site average nitrogen rates below (sic) the lower range of the crucial load at all sites in the borough. Similarly average NO2 concentrations are below the critical level and air quality exceedance limit'.</p> <p>This would appear to be in flat contradiction to the clear indication in last year's Airports Commission Air Quality</p>	<p>11. Mr Andrew McLuskey United Reformed Church</p> <p>11.1- Para 3.163- "The SW London Waterbodies SPA and Ramsar in Spelthorne has current site average nitrogen rates below the lower range of the critical load at all sites in the borough. Similarly average NO2 concentrations are below the critical level and air quality exceedance limit". This would appear to contradict the Airports Commission Air Quality Assessment that</p>	<p>11.1 – As set out in the Airports Commission Air Quality Local Assessment 2015, current nitrogen deposition rates at the SW London Waterbodies and Wraysbury Reservoir SSSI are below the lower range of the Critical Load. Current site average NOx concentrations are below the critical level and air quality objective. Table 5.1 of the Airports Commission Assessment to be added to SA Scoping Report and para 3.163 to be amended to reflect this.</p>

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	<p>Assessment that there is currently an exceedance of the NOx Critical Level at the SW London Waterbodies RAMSAR/SPA and Wraybury Reservoir SSSI.</p> <p>Following on from this - and noting yesterday's High Court judgement which pointed out weaknesses in the pollution modelling used by central government - I feel the people of Spelthorne need more evidence of robustness in the Borough's air pollution measurements and an explanation of the apparent conflict with the Airports Commission statement.</p>	<p>there is currently an exceedance of NOx Critical Level at the SW London Waterbodies SPA/Ramsar and Wraybury Reservoir SSSI.</p> <p>11.2- Following this and noting the High Court judgement which pointed out weaknesses in the pollution modelling used by central government, more evidence of robustness in the Borough's air pollution measurements is needed.</p>	<p>11.2 – Comment noted. Explanation of pollution monitoring to be included in report for clarity.</p> <p>Agree to the following factual changes:</p> <ul style="list-style-type: none"> • Include a table of annual mean nitrogen deposition rates and NOx concentrations from the Airports Commission Air Quality Assessment 2015 and clarify findings in para 3.163. • Add footnote to explain pollution monitoring in report.
00034/17/001	<p>Surrey County Council</p> <p>I am writing in response to the current consultation on the review of the evidence base documents to support the new Spelthorne Local Plan.</p> <p>Our response relates to transport matters with regard to the Spelthorne Local Plan Sustainability Appraisal/Strategic Environmental Assessment Draft Scoping Report. We have no comments to make on the Green Belt Assessment - Draft Methodology or on the Spelthorne Functional Economic Area Analysis Draft Report.</p> <p>We are surprised that no reference is made in the Draft Scoping Report to Crossrail 2. As you will be aware, the scheme is expected to connect to stations in Spelthorne and to terminate/originate at Shepperton. Crossrail 2 is expected to be operational from 2030 and would improve connectivity between London and the borough.</p> <p>The wording in the final sentence of paragraph 3.57 which reads: "These schemes have yet to be designed and implemented." should be changed to read: "The construction of Egham Sustainable Transport Package is underway and due for completion by January 2017."</p>	<p>12. Surrey County Council</p> <p>Our response relates to transport matters.</p> <p>12.1- We are surprised that no reference is made in the Draft Scoping Report to Crossrail 2. As you will be aware, the scheme is expected to connect to stations in Spelthorne and to terminate/originate at Shepperton. CR2 is expected to improve connectivity between London and the borough from 2030.</p> <p>12.2- Para 3.57 reads "These schemes have yet to be designed and implemented". It should be changed to read "The construction of Egham Sustainable Transport Package is underway and due for completion by January 2017". Runnymede Roundabout is currently in the procurement stage with construction due to begin in January 2017 and to be completed by March 2018.</p> <p>12.3- It may also be worth mentioning the Staines Sustainable Transport Package (Phase 1) here. The business case for the scheme was submitted at the end of December and a decision from the LEP is expected in January. Appropriate additional text could be included as follows:</p>	<p>12.1 – Reference to Crossrail 2 to be added.</p> <p>12.2 – Para 3.57 to be updated to note the progress of the Egham Sustainable Transport Package and Runnymede Roundabout improvements.</p> <p>12.3 – Reference to the Wider Staines Sustainable Transport Package to be added following para 3.57.</p> <p>Agree to the following factual changes:</p> <ul style="list-style-type: none"> • Add reference to Crossrail 2 • Update para 3.57 to refer to the Egham Sustainable Transport Package progress and the Staines Sustainable Transport Package.

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	<p>Runnymede Roundabout is currently in the procurement stage with construction due to begin in January 2017 and to be completed by March 2018.</p> <p>It may also be worth mentioning the Staines Sustainable Transport Package (Phase 1) here. The business case for the scheme was submitted at the end of December and a decision from the LEP is expected in January. Appropriate additional text could be included as follows:</p> <p>"A Staines Sustainable Transport Package (STP) (Phase 1) funding bid was submitted to the Local Enterprise Partnership in September 2016. This project will develop cycle routes between Staines town centre, Stanwell and the Heathrow Airport complex as well as making improvements for pedestrians and to bus facilities. The funding decision is expected January 2017. This package forms the first phase in a three phase plan to improve the sustainable transport network within the wider Staines area."</p> <p>Our heritage team have been consulted by your council directly on these Local Plan SPDs and you will be aware that Nigel Randall has responded separately with comments relating to archaeology. In accordance with our protocol for consultations we would be grateful if you would direct all future Local Plan consultations to our generic email address: planning.consultations@surreycc.gov.uk . Use of this address should avoid duplicate county council responses being sent from individual officers to boroughs and districts. It should also negate the risk of consultations being sent to email addresses of staff who may no longer work for the council.</p>	<p>"A sustainable Transport Package (STP) (Phase 1) funding bid was subject to the Local Enterprise Partnership in September 2016. This project will develop cycle routes between Staines town centre, Stanwell and the Heathrow Airport complex as well as making improvements for pedestrians and to bus facilities. The funding decision is expected January 2017. This package forms the first phase in a three phase plan to improve the sustainable transport network within the wider Staines area".</p>	
00025/6/001	<p>Runnymede Borough Council</p> <p>Runnymede Borough Council has no comment to make on the Sustainability Appraisal/Strategic</p>	<p>13. Runnymede Borough Council</p> <p>13.1- Runnymede Borough Council has no comment to make on the Sustainability Appraisal/Strategic Environmental</p>	<p>Noted.</p> <p>No changes to be made.</p>

Comment Ref No	Verbatim Comment	Summarised Comment	SBC Response
	Environmental Assessment Draft Scoping Report at this time.	Assessment Draft Scoping Report at this time.	
00026/5/001	<p>Elmbridge Borough Council</p> <p>A number of the maps showing data for IMDs do not show the whole borough. This should be adjusted to encompass the entire area.</p> <p>Paragraph 3.37 - inconsistency as it states that vacancy rates are relatively low in Shepperton but reasonably high in Sunbury Cross when their vacancy rates are the same.</p>	<p>14. Elmbridge Borough Council</p> <p>14.1- A number of IMD maps do not show the whole borough. This should be adjusted to encompass the entire area.</p> <p>14.2- Para 3.37- Inconsistency as it states that vacancy rates are relatively low in Shepperton but reasonably high in Sunbury Cross when their vacancy rates are the same.</p>	<p>14.1 – IMD maps to be amended to show whole borough.</p> <p>14.2 – Para 3.37 to be amended to take account of different vacancy rates.</p> <p>Agree to the following factual changes:</p> <ul style="list-style-type: none"> • Update IMD maps to show the whole borough. • Amend para 3.37 on vacancy rates.
00034/16/001	<p>Surrey County Council</p> <p>Section 3.96, P48 The designated sites of archaeological importance (noted in Section 3.93) are presently under review. Their number and extent could increase or decrease as part of this process and therefore, Section 3.96 should include a note, similar to that made for conservation areas. That sites of archaeological importance could be amended, added or removed.</p>	<p>15. Surrey County Council</p> <p>15.1- Section 3.96, P48 The designated sites of archaeological importance (noted in Section 3.93) are presently under review. Their number and extent could increase or decrease as part of this process and therefore, Section 3.96 should include a note, similar to that made for conservation areas that sites of archaeological importance could be amended, added or removed.</p>	<p>15.1- Footnote to be added to para 3.93 to note that the designated sites of archaeological importance are presently under review and update para 3.96 to reflect this.</p> <p>Agree to the following factual changes:</p> <ul style="list-style-type: none"> • Include reference to the ongoing review of designated sites of archaeological importance in para 3.93 and para 3.96.

