



Mr J. Bridgwater  
Planning Inspector  
(by email)

Please reply to:  
Contact: Daniel Mouawad  
Chief Executive  
Direct line: 01784 446350  
Email: DCM.CEX@spelthorne.gov.uk  
Our ref:  
Date: 23 July 2024

Dear Mr Bridgwater,

### **Spelthorne Local Plan Examination**

I write to you to request the resumption the Examination in Public for Spelthorne's new Local Plan.

You have kindly provided us with two pauses to the examination hearings, which have allowed for our newer Members to understand more about the Local Plan, for a Critical Friend review and latterly to await the publication of the revised National Planning Policy Framework.

I understand you were provided with a copy of the report, via the Programme Officer, to the Corporate Policy & Resources Committee meeting that took place on Monday 8 July 2024 and which made a set of recommendations to Council. At the full Council meeting on 18 July, following an email received from the Environment Agency at 3pm that day, it was proposed by Councillor Sexton and seconded, that the wording within the report at paragraph 3.11 be amended to reflect the wording suggested by the Environment Agency. The revised wording was as follows:

*“The site will not be available for development until a safe route for access and egress can be provided and maintained during a flood event (ie the 1% AEP fluvial flood event and surface water event including an appropriate climate change allowance)”.*

Council resolved to agree to the amended wording as outlined above.

It was proposed by Councillor Sexton and seconded that Council approve to:

1. Propose a Main Modification to the Inspector to remove Bridge Street Car Park/Hanover House/Sea Cadet building (ST4/002) and Riverside surface car park (ST4/010) as site allocations from the Local Plan,
2. Propose a Main Modification to the Inspector to agree to new policy wording in relation to site allocations at risk from access and egress issues and for such wording to be finalised by the Group Head of Place, Protection and Prosperity in consultation with the Chair and Vice-Chair of the Corporate Policy & Resources Committee; and

3. Agree that the Chair of the Environment & Sustainability Committee write to the Inspector with further proposed Main Modifications (if agreed) in order to progress the Local Plan back to Examination.

Council resolved to approve the recommendations.

These recommendations are in addition to those set out in my letter dated 6 March 2024, following a meeting of the Environment & Sustainability Committee meeting that took place on Thursday 29 February. That report set out options for considering major modification to the Local Plan before the examination resumes, covering the themes of Green Belt allocations, flood risk sites and the Staines Development Framework. The Committee decided on the options for these themes as follows:

- Remove all Green Belt allocations from the Local Plan with the exception of the two allocations that meet the need for Gypsy, Traveller and Travelling Showpeople
- Keep all proposed flood risk sites but remove those at high risk of flooding and move some high-risk sites to later in the Plan period (11-15 years) to allow for the River Thames Scheme to be operational and effective, the design code to be completed and subject to no resolute objection from the Environment Agency
- Withdraw the Staines Development Framework as a core document

For clarity, the Main modifications proposed to site allocations are summarised in the table below:



Site ID	Address	No. of units	G&T pitches and plots	Original time period	Change time period	GB or Urban?	Proposed Main modification to Site Status
AS1/011	Land at Former Bulldog Nurseries, Town Lane, Ashford, TW19 7BZ	24		1-5 years		GB	E&S 29 Feb 2024 voted to request removal of all GB allocations except two G&T sites
AS2/006	Land East of Desford Way, Ashford, TW15 3FF	0	15	1-5 years		GB	
AT1/002	Land East of Ashford Sports Club, Woodthorpe Road, Ashford, TW15 3JX	108		1-5 years		GB	E&S 29 Feb 2024 voted to request removal of all GB allocations except two G&T sites
AT1/012	Ashford Community Centre, Woodthorpe Road, Ashford, TW15 3LF	32		1-5 years		GB	E&S 29 Feb 2024 voted to request removal of all GB allocations except two G&T sites
AT3/007	Ashford Multi-storey Car Park, Church Road, Ashford, TW15 2TY	55		1-5 years		Urban	
AT3/016	23-31 (not 11-19) Woodthorpe Road, Ashford, TW15 2RP	120		1-5 years		Urban	
HS1/002	Land at Croysdale Avenue/ Hazelwood Drive, Sunbury, TW16 6QN	67		1-5 years		GB	E&S 29 Feb 2024 voted to request removal of all GB allocations except two G&T sites
HS1/009	Bugle Nurseries, 171 Upper Halliford Road, Shepperton, TW17 8SN	79		1-5 years		GB	E&S 29 Feb 2024 voted to request removal of all GB allocations except two G&T sites
HS1/012	Land East of Upper Halliford, Nursery Road, Upper Halliford, TW16 6JW	60		1-5 years		GB	E&S 29 Feb 2024 voted to request removal of all GB allocations except two G&T sites
HS2/004	Land South of Nursery Road, Sunbury on Thames, TW18 6LX	41		1-5 years		GB	E&S 29 Feb 2024 voted to request removal of all GB allocations except two G&T sites
LS1/024	Land at Staines Road West and Cedar Way, Sunbury, TW16 7BL	77		1-5 years		GB	E&S 29 Feb 2024 voted to request removal of all GB allocations except two G&T sites

Site ID	Address	No. of units	G&T pitches and plots	Original time period	Change time period	GB or Urban?	Proposed Main modification to Site Status
SE1/005	Benwell House, Green Street, Sunbury, TW16 6QF	39		1-5 years		Urban	
SE1/024	Annandale House, 1 Hanworth Road, Sunbury, TW16 5DJ	295		1-5 years		Urban	
SN1/006	Land to West of Long Lane and South of Blackburn Trading Estate, Stanwell, TW19 7AN	200		1-5 years		GB	E&S 29 Feb 2024 voted to request removal of all GB allocations except two G&T sites
ST1/037	Thameside House, South Street, Staines, TW18 4PR	140		1-5years		Urban	
ST1/043	Land East of 355 London Road, Staines	0	3	1-5 years		Urban	
ST3/004	34-36 Kingston Road (Oast House) & Car Park, Staines, TW18 4LN	180		1-5 years		Urban	
ST4/002	Bridge Street Car Park, Hanover House & Sea Cadet Building, Bridge Street, Staines	158		1-5 years		Urban	E&S 29 Feb 2024 voted to change from residential to leisure use incl hotel.  21 June 2024 EA requested removal of site due to flood issues.  18 July Council resolved to request Main Modification to remove site from Local Plan.
ST4/019	35-45 High Street, Staines (Former Debenhams Site), TW18 4QU	150		1-5 years	Move to 6-10	Urban	
ST4/025	Coppermill Road, Wraysbury, TW19 5NU	15		1-5 years		GB	E&S 29 Feb 2024 voted to request removal of all GB allocations except two G&T sites
ST4/026	Communications House, South Street, Staines, TW18 4QE	120		1-5 years	Move to 11-15	Urban	
ST4/028	William Hill / Vodafone/ Monsoon, 91-93 High Street, Staines TW18 4PQ	14		1-5 years	Move to 11-15	Urban	
AE3/006	158-166 Feltham Road, Ashford, TW15 1YQ	75		6-10 years		Urban	
AS1/001	Tesco Extra, Town Lane, Stanwell, TW15 8RW	350		6-10 years		Urban	
AS1/003	Former Staines Fire Station, Town Lane, Stanwell, TW19 7JP	50		6-10 years		Urban	

Site ID	Address	No. of units	G&T pitches and plots	Original time period	Change time period	GB or Urban?	Proposed Main modification to Site Status
HS1/012b	Land East of Upper Halliford Road (Site B), Upper Halliford, TW16 6JL	20		6-10 years		GB	E&S 29 Feb 2024 voted to request removal of all GB allocations except two G&T sites
RL1/011	Land at Staines and Laleham Sports Club, Worple Road, Staines, TW18 1HR	52		6-10 years		GB	E&S 29 Feb 2024 voted to request removal of all GB allocations except two G&T sites
SC1/006	Tesco Extra, Escot Road, Sunbury, TW16 7BB	225		6-10 years		Urban	
SE1/020	Sunbury Adult Education Centre, The Avenue, Sunbury-on-Thames	30		6-10 years		Urban	
SE1/025	Elmbrook House, 18-19 Station Road, Sunbury, TW16 6SU	50		6-10 years		Urban	
SH1/010	Shepperton Library, High Street, Shepperton, TW17 9AU	10		6-10 years	Move to 11-15	Urban	
ST1/028	Leacroft Centre, Leacroft, Staines, TW18 4PB	17		6-10 years	Move to 11-15	Urban	
ST1/029	Surrey County Council Buildings, Burges Way, Staines, TW18 1YA	30		6-10 years		Urban	Proposed to remove from the Local Plan prior to start of Examination due to flood risk and confirmed by E&S 29 Feb 2024
ST1/030	Fairways Day Centre, Knowle Green, Staines, TW18 1AJ	30		6-10 years		Urban	Proposed to remove from the Local Plan prior to start of Examination due to flood risk and confirmed by E&S 29 Feb 2024
ST3/014	Birch House/London Road, Fairfield Avenue, Staines, TW18 4AB	400		6-10 years		Urban	
ST4/004	96-104 Church Street, Staines, TW18 4QF	100		6-10 years		Urban	
ST4/010	Riverside Car Park, Thames Street, Staines, TW18 4UD	35		6-10 years		Urban	E&S 29 Feb 2024 voted to move to years 11-15.  21 June 2024 EA requested removal of site due to flood issues.  18 July 2024 Council resolved to request Main Modification to remove site from Local Plan.

Site ID	Address	No. of units	G&T pitches and plots	Original time period	Change time period	GB or Urban?	Proposed Main modification to Site Status
ST4/011	Thames Lodge Hotel, Thames Street, Staines, TW18 4SJ	40		6-10 years		Urban	E&S 29 Feb 2024 voted to request removal due to flood risk issues
ST4/023	Two Rivers Retail Park Terrace, Mustard Mill Road, Staines	750		6-10 years		Urban	
ST4/024	Frankie & Benny's/Travelodge, Two Rivers, Hale Street, Staines, TW18 4UW	55		6-10 years		Urban	
AS2/001	Ashford Youth Club, Kenilworth Road, Ashford, TW15 3EL	5		11-15 years		Urban	
AT3/009	Ashford Telephone Exchange, Church Road, Ashford, TW15 2TS	20		11-15 years		Urban	
SC1/013	RMG Warehouse & Delivery Office, 47-49 Staines Road West, Sunbury, TW16 7AA	22		11-15 years		Urban	
SC1/019	Sunbury Social Services Centre, 108 Vicarage Road, Sunbury, TW16 7QL	11		11-15 years		Urban	
SC1/021	Land at Spelthorne Grove, Sunbury, TW16 7BZ	250		11-15 years		Urban	
SE1/003	Builder's Yard, 77 Staines Road East, TW16 5AD	75		11-15 years		Urban	
SE1/008	Telephone Exchange, Green Street, Sunbury, TW16 6QJ	14		11-15 years		Urban	
SH1/015	Shepperton Youth Centre, Shepperton Court Drive, Shepperton, TW17 8EJ	24		11-15 years		Urban	
SH2/003	Shepperton Delivery Office, 47 High Street, Shepperton, TW17 9AA	10		11-15 years		Urban	
SN1/005	Land at Northumberland Close, Stanwell, TW19 7LN	80		11-15 years		GB	E&S 29 Feb 2024 voted to request removal of all GB allocations except two G&T sites
SN1/012	Stanwell Bedsits, De Havilland Way, Stanwell, TW19 7DE	175		11-15 years		Urban	
ST1/031	Thameside Arts Centre, Wyatt Road, Staines, TW18 2AY	19		11-15 years		Urban	
ST2/006	Builders Yard, Gresham Road, Staines, TW18 2BE	343		11-15 years		Urban	
ST3/012	Staines Telephone Exchange, Fairfield Avenue, TW18 4AB	180		11-15 years		Urban	

<b>Site ID</b>	<b>Address</b>	<b>No. of units</b>	<b>G&amp;T pitches and plots</b>	<b>Original time period</b>	<b>Change time period</b>	<b>GB or Urban?</b>	<b>Proposed Main modification to Site Status</b>
<b>ST4/009</b>	Elmsleigh Centre and Adjoining Land, South Street, Staines, TW18 4QF	850		11-15 years		Urban	



Spelthorne Council fully recognises that modification of the Local Plan at this stage rests with yourself as Inspector and that we are simply requesting that you give consideration to the main modifications set out above, and in light of the justification within the committee reports. We would be happy to provide you with any further information or evidence to enable you to decide whether these main modifications can be accepted and discussed further through the hearing sessions once the examination resumes.

We have worked closely with the Environment Agency over the last 14 months to overcome their concerns, for example (as set out above) we propose main modifications to remove a total of five sites from the Local Plan. We have also proposed new wording to the site allocations of a further 13 sites, exactly as proposed by the EA in an email dated 18 July, to ensure

*“The site will not be available for development until a safe route for access and egress can be provided and maintained during a flood event”.*

We are working to agree a Statement of Common Ground with the Environment Agency and hope to have a draft with them next week for review. It will include

- Final wording of policy E3
- Last final amendments to SFRA documents as set out in their recent correspondence
- SBC commitment to update SFRA documents whenever new modelling is published or otherwise update needed
- Resolutions of the meeting on full Council 18 July 2024
- SBC commitment to the production of/significant revision of and update of a flood risk SPD as soon as practicable after the completion of the Local Plan Examination.

The agreement of the Statement of Common Ground will mark the successful conclusion of our cooperation with the EA and we think that we have therefore exhausted all potential avenues to resolve the concerns of the Environment Agency and would be grateful if you could let me know how you would like to take things forward at your earliest convenience.

We wish to offer our continued assurance that Spelthorne wishes to have a Local Plan in place at the earliest opportunity and very much hope you will agree to resume the examination.

Yours sincerely,

Councillor Malcolm Beecher  
Chair of Environment & Sustainability Committee