

APPENDIX B-

Consultation

Statement: Spelthorne

Design Code



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Introduction

Spelthorne Borough Council has prepared a Design Code to guide high-quality, sustainable development that reflects local character and the community's design priorities. The Code sets out design requirements for future new development, including guidance for the design of buildings, streets, open spaces and the public realm across the Borough. The Code will also be a factor in guiding future planning decisions.

The Design Code has been prepared in line with national policy and guidance. The National Planning Policy Framework (NPPF) encourages local authorities to set clear design expectations and use tools such as design codes and masterplans to secure high-quality development (NPPF, Chapter 12). Planning Practice Guidance (PPG) identifies design codes as effective tools for shaping well-designed places (PPG Ref ID: 26-006-20191001). The National Model Design Code (NMDC) further supports this approach by providing a Design Code framework for larger sites. These documents collectively provide a strong policy basis for the Design Code as a Supplementary Planning Document (SPD).

The Design Code will be adopted as a Supplementary Planning Document (SPD) under the Planning and Compulsory Purchase Act 2004. While SPDs are not part of the statutory development plan and are not subject to independent examination, they are a material consideration in planning decisions and provide detailed guidance to implement Local Plan policies, in this case those concerning the design of future development in the Borough.

In accordance with Spelthorne Borough Council's Statement of Community Involvement (SCI) and Regulation 12(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), this Consultation Statement sets out:

1. What was consulted on during the statutory consultation of the draft Spelthorne Design Code
2. How the Council consulted stakeholders
3. A summary of the main issues raised by those consulted on the draft Design Code
4. How those issues have been addressed in the Design Code
5. Stakeholder engagement throughout the preparation of the Design Code

1. What was consulted on during the statutory consultation of the draft Spelthorne Design Code

The [Spelthorne Design Code- Final Draft for Consultation \(May 2025\)](#) was the main document published to be consulted on during the statutory consultation on the draft Code.

The questions on the online survey, which was available for comment on the dedicated [Spelthorne Design Code engagement hub](#), revolved around the following:

- if the Design Code is easy to understand, accessible, deliverable and will make a difference for better quality design in the Borough;
- if the design requirements for future development meet Spelthorne's needs and aspirations;
- how the Design Code could be improved.

2. How the Council consulted stakeholders

The Consultation Process

The consultation process followed Spelthorne Borough Council's SCI, which sets out how and when the Council intends to involve people, businesses and organisations in the planning process. In the lead up to, and during, the statutory consultation on the draft Design Code, the Council undertook a variety of communication methods to ensure that as many people as possible were notified of the consultation and encouraged to respond.

Stakeholders consulted

The following stakeholders were engaged during the consultation:

- All residents
- People who work in the Borough
- Visitors to the Borough (including shopping, leisure, culture etc)
- Local businesses
- Statutory consultees
- Councillors
- Residents' associations
- Students and young people via local schools and youth groups etc.
- Charity, voluntary and local community groups and community interest companies
- Relevant governmental organisations and public bodies
- Emergency services and utility companies
- Council staff
- House builders and registered providers

How stakeholders could respond

The consultation ran from 26 June to 4 August 2025. The [Spelthorne Design Code- Final Draft for Consultation \(May 2025\)](#), which was being consulted on, was available to view

and download on the Spelthorne Design Code engagement hub, as well as available via printed copies at all libraries across the Borough and at the Council Offices.

To respond to the consultation, stakeholders could submit their comments via multiple ways:

- [Online survey](#) on the engagement hub
- Email to the designated Design Code inbox designcode@spelthorne.co.uk
- Post to Strategic Planning, Council Offices, Knowle Green, Staines-upon-Thames, TW18 1XB

Consultation responses

The consultation received 81 responses in total from stakeholders including residents, other local groups and statutory consultees.

Statutory consultees who responded to the consultation included:

- Surrey County Council (SCC)
- National Highways
- Historic England
- Network Rail (NR)
- Surrey Police
- Natural England
- Colne Valley Regional Park
- Woodland Trust

3. A summary of the main issues raised by those consulted on the draft Design Code

Feedback Themes

Public Feedback Themes

Design Quality, Heritage and Character

Support for character-led design but concerns that recent developments look generic and unattractive. Calls for more innovative architecture, preservation of historic facades and better integration with existing buildings.

Code Accessibility, Usability and Clarity

The Code is seen as too long, technical and less accessible for lay readers. Suggestions include simplified summaries, clearer diagrams, an improved glossary, clearer definitions and stronger mandatory language (e.g., “must” instead of “should”).

Building Heights and Density*

Strong concern about high-rise buildings (specifically 8+ storeys), especially in Staines-upon-Thames. Concerns include high-rise buildings harming local character, blocking light and creating too-tight spaces. Calls for clear, enforceable height caps (defined in metres, not storeys and from ground base level, not pavement level), particularly near conservation areas and riversides.

Infrastructure and Services*

Concerns that the Code overlooks infrastructure needs such as GP surgeries, schools, roads, traffic and flood defences. Many feel that Staines is being overdeveloped without adequate provisioning of public services.

Flood Risk and Groundwater Concerns*

Strong concern about groundwater flooding and lack of specific flood mitigation measures. Calls for mandatory hydrological and hydrogeological surveys with planning applications, with strong desire to use Royal Holloway research.

Riverside Identity and Character

Strong desire to preserve Staines' riverside character as a leisure and heritage area. Concerns about commercial or high-rise development along the River Thames frontage, with calls for improved river access for small boats and recreation.

Housing Mix*

Concerns about Houses in Multiple Occupation (HMOs) and potential loss of family homes, if over-reliance on flats. Calls for minimum quotas of 3+ bedroom houses, proper design standards for HMOs and further protection of suburban character.

Transport and Connectivity*

Calls for improved public transport and traffic management, including better rail and bus links, enhanced station access and lighting. Desire to address and not worsen congestion around Staines Bridge and Two Rivers.

Enforcement and Monitoring*

Concerns about enforcement and monitoring, with doubts over how compliance will be policed and whether developers will follow the rules.

***NB: The feedback themes with a purple asterisk are mostly or partly matters that fall outside the scope of the Design Code and are addressed through other policies and legislation, or deal with implementation of the Code rather than its contents.**

Technical Consultee Themes

Green Infrastructure, Biodiversity and Connectivity

Calls for stronger integration of new development with natural environments like the Colne Valley Regional Park (CVRP) to enhance access, biodiversity, recreation and climate resilience. Tree-lined streets and green infrastructure are supported by the Woodland Trust but some desire for clearer guidance on species selection and planting.

Heritage and Local Identity

Requests for more detailed treatment of historic areas, with emphasis from SCC and Historic England on preserving Spelthorne's heritage. Suggestions include using Historic Environment Record data, coding town centres individually and ensuring context-sensitive design for historic settlements like Sunbury, Ashford, Stanwell and Laleham.

Transport, Accessibility, and Active Travel

Support for walking and cycling access, with backing from NR and SCC for active travel principles. Recommendations include improving access to railway stations, enhancing public realm around transport hubs, integrating SCC's Healthy Streets for Surrey principles and aligning street typologies and parking standards with this guidance.

Flood Risk and Sustainable Drainage

Support for incorporating Sustainable Drainage Systems (SuDS) and flood resilience strategies, with SCC (Lead Local Flood Authority) supporting their inclusion in the Code.

Public Safety

Advocacy for Secured by Design standards, with Surrey Police desiring stronger integration of crime prevention measures, such as lighting, surveillance, access control and secure doors/windows, especially for tall buildings. NR supports connectivity principles but expresses concerns over safety risks from increased level crossing use, recommending elevated pedestrian crossings instead.

4. How those issues have been addressed in the Design Code

You Said:

Concerns were raised about heights, in terms of lack of clarity in measurement (storeys vs. metres) and the impact on character and views.

✓ We Did + Why:

Height diagrams and storey-to-metre clarification added and marker buildings were redefined. The Design Code sets out design parameters that can make different development densities and heights work successfully together with acceptable density measures (e.g. Floor Area Ratio) or acceptable heights in different area types and locations. Coding requirements for density or height measures for allocated sites ensure anticipated capacity can be delivered.



We Did + Why:

Conservation Area clarity added and relevant heritage documents referenced. Added design guidance with new town centre strategy for river frontage. More information was added on smaller villages for thoroughness, with reference to historic character. The Local Plan already contains policy to safeguard and enhance leisure spaces and the Conservation Area.

You Said:

Desire expressed to protect historic buildings and riverside character, especially in Staines and Sunbury. Suggestions to improve access to the river and to preserve riverside leisure spaces and heritage buildings.

You Said:

Comments on need for more consideration for disabled residents and inclusive and safe design.



We Did + Why:

Accessibility aims, considerations and requirements are already mentioned in the Code, particularly in relation to front boundary treatment, new streets, active travel and building adaptability. The Design Code promotes inclusive and accessible environments in line with the Equality Act 2010. SCC's Healthy Streets for Surrey is also referenced, which includes accessibility considerations the Code adheres to. Further integrated Secured by Design references.



We Did + Why:

The location and quantum of development in the Borough falls within the remit of the Local Plan and is not addressed in the Design Code.

The Design Code sets out design parameters that can make different development densities and heights work successfully together with acceptable density measures (e.g. Floor Area Ratio) or acceptable heights in different area types and locations. Coding requirements for density or height measures for allocated sites ensure anticipated capacity can be delivered.

You Said:

Fears that Staines is being overburdened with housing targets, leading to more congestion, loss of character and strain on infrastructure.



You Said:

Complaints about the document being too long, technical and hard to navigate.



We Did + Why:

Improved navigation, glossary, diagrams and added simplified checklists. The Spelthorne Design Code has been developed to be as concise as possible, in light of the content that has to be included. The Code is anticipated for use as a digital version. The digital Code will enable applicants to easily navigate to the parts of the Code relevant to a site's location and the type of development proposed.

The Council will monitor adherence to the Design Code through planning application validation and planning conditions where appropriate. This approach aligns with the NPPF's emphasis on securing high-quality design and ensures the Code is applied consistently.



We Did + Why:

Native species and Colne Valley Regional Park referenced. Local Plan policies and the Climate Change SPD are the primary documents that address these issues, however the Design Code contains detailed requirements for green infrastructure elements within the built environment as well as codes relating to climate change and sustainability.



You Said:

Requests for stronger green infrastructure, tree canopy targets and climate adaptation measures.

You Said:

Broader concerns about
fluvial and surface water
flooding, not just
groundwater.

We Did + Why:

Flood risk and groundwater constraints are primarily addressed through Local Plan policies and national policy requirements, including the NPPF's flood risk tests. The Design Code supports these policies by incorporating guidance on Sustainable Drainage Systems (SuDS) and resilience measures to manage surface water and climate

✓ We Did + Why:

How to use the checklists further clarified and “Comply or Justify” principle emphasised. When it is completed, the Design Code will be adopted as a Supplementary Planning Document (SPD). An SPD is a planning document which expands upon policy and provides more detail to policies in development plans, such as the Local Plan.

SPDs are a material consideration in planning decisions but are legally not part of statutory development plans, nor are they subject to independent examination.

Therefore, the Design Code once adopted, will have a material weight in planning decisions and will provide more detailed guidance and on how the policies in the Local Plan will be implemented in relation to design of future development.

Some parts of the Code set out guidance, best practice or design inspiration from elsewhere that could provide the basis for the development of design proposals.

These are design ideas that development could implement, and are highlighted as such.

You Said:

Doubts about whether developers will follow the Code and how it will be enforced.

You Said:

Strong concerns about the hydrological impact of deep foundations, referencing Royal Holloway research. Calls for mandatory surveys and legal accountability of developers.



We Did + Why:

Need for engineering evidence highlighted and flood risk and groundwater impact referenced. Risk of groundwater flooding is a constraint to development and does not fall within the scope of the Design Code.

Local Plan policy addresses flooding issues where they are a constraint to development. The design code sets out good design process and advises that constraints including flooding should be considered and addressed as set out in the Local Plan.



We Did + Why:

The delivery of supporting infrastructure does not fall within the scope of the Design Code and is covered by the Local Plan. Healthy Streets for Surrey also covers design principles in relation to road design, integrating public transport and pedestrian and pavement design.

You Said:

Lack of planning for schools, GPs, transport and public services to support population growth.



You Said:

Worries about congestion, especially around Staines Bridge and Two Rivers. Requests for better transport planning.

✓ We Did + Why:

Network Rail guidance referenced and Code further aligned with Healthy Streets for Surrey. Traffic and transport concerns are not within the remit of the Design Code. Surrey County Council's Local Transport Plan and the emerging Local Plan cover transport policies, schemes and other transport matters. Healthy Streets for Surrey also covers accessibility and traffic design principles.



We Did + Why:

Feedback noted and further guidance considered. Housing mix and use types in the Borough falls within the remit of the Local Plan and is not addressed in the Design Code.

You Said:

Concerns about loss of family homes and rise of HMOs, especially in suburban areas.

5. Stakeholder engagement throughout the preparation of the Design Code

The Overall Engagement Process

The Design Code was developed through a three-stage engagement process from Summer 2024- Summer 2025. For online public engagement throughout the project, the Spelthorne Design Code Commonplace page, which is an online engagement hub, was established.

Initial Engagement (Stage 1- LISTEN)

Public feedback was gathered in this first stage to understand the following:

- The places of Spelthorne in detail
- What makes Spelthorne special
- The key design challenges in Spelthorne
- How the Design Code can enhance and improve the Borough in the future

Engagement type	Further details
Summer 2024	
Walking tours and digital walks	A series of 2-hour long walking tours took place in 6 locations across the Borough (Staines-upon-Thames Town Centre, Staines-upon-Thames Wider Area, Stanwell, Ashford, Sunbury-on-Thames and Shepperton), which were guided by local people to find out their opinions about local buildings, streets and spaces they liked and disliked and to gain an insight into design issues that matter to them. Digital Walks were also held virtually for those unable to attend the ones in-person. Residents could share their views about different parts of the Borough that were of interest by guiding the team around an online map. This resulted in 4.5 hours of digital engagement.
Youth workshops with local schools and Ashford Youth Club	To provide some youth engagement opportunities, sessions were held at 2 local schools (The Matthew Arnold School and

	Sunbury Manor School) and Ashford Youth Club to find out young people's opinions about design issues and their design priorities.
Autumn 2024	
2 Citizens' Panel workshop sessions	<p>A Citizens' Panel was created to demographically-represent the Borough and to share views and help shape the Design Code to ensure it is inclusive and meets the community's diverse needs. Following a 7.5-week recruitment period, which saw over 140 applications, over 40 Panel members were blindly selected to reflect Spelthorne's diverse demographics including age, gender, ethnicity, housing situation and geographical location, according to Census data.</p> <p>2 Citizens' Panel focus sessions, which were run by the appointed consultants David Lock Associates and Feria Urbanism, were held on 16 November 2024 and 23 November 2024. The first workshop fed public feedback that had been collected so far into the Panel and Panel members reviewed this. Panel members also worked on exploring what makes Spelthorne unique, what to preserve and change and a vision for the Borough's design. The second workshop focused on safety and accessibility, particularly on how future development can cater to everyone's needs. Members also shared personal experiences and their vision for various edge conditions and building types, considering how development fits within its surroundings. These valuable insights were fed into the draft Code.</p>
Interactive map on Commonplace engagement platform	Local people could virtually drop pins on specific locations within Spelthorne and share their thoughts and pictures about that place, area or a more specific design feature. This engagement opportunity ran for 14 weeks and received over 600 contributions.
Drop-in session at Elmsleigh Shopping Centre	A public drop-in session with interactive activities was held in the Elmsleigh Shopping Centre in November 2024 and provided residents with an opportunity to meet the Design Code Team, learn about Spelthorne in detail, engage in discussions, ask questions, and share their perspectives on what makes Spelthorne unique.

First Draft Engagement (Stage 3- TEST)

Public feedback was gathered during this stage to understand the following:

- Whether the draft Code is clear in what it covers
- If and how the draft Code could be improved
- If the design vision and principles are supported
- How well the draft Code responds to the community's priorities

Engagement type	Further details
Spring 2025	
Citizens' Panel workshop session	<p>The third and final Citizens' Panel session was held on 1 March 2025 to test the draft Code. At the session, the Panel worked on reviewing and applying the draft Design Code to real-world development scenarios and example sites. The project team also explained the Design Code's purpose, development and role in planning, how public feedback had shaped the Code so far and who will use it.</p>
Public engagement on first draft of the Spelthorne Design Code	<p>A public engagement opportunity for the wider community ran for 3 weeks from 18 March 2025 to 8 April 2025 on Commonplace for technical stakeholders and local people to test the draft Code. The draft Code was available to view and download and the local community could find out what was in the draft Code, see how the draft Code responded to the community and provide feedback to help refine and develop the Code. Feedback was gathered via a survey on the Commonplace engagement hub and also via email, which resulted in 45 responses.</p>

Public Statutory Consultation (Stage 4- STATUTORY CONSULTATION)

Public feedback was gathered during this stage to understand the following:

- Stakeholder views on the draft Code in general, more particularly on the content and requirements set out in the Code
- Whether the language is clear and accessible
- Whether diagrams are clear and sufficiently detailed
- If the Code will help deliver good design and improve the quality of design in the future
- If the checklists will aid applicant compliance
- If and how the draft Code can be improved

Engagement type	Further details
Summer 2025	
Statutory consultation on final draft of the Spelthorne Design Code	<p>The statutory public consultation on the Spelthorne Design Code - Final Draft for Consultation (May 2025) ran for 6 weeks from 24 June 2025 to 4 August 2025, mainly run via the Commonplace engagement hub. The updated draft Code was available for the public to view and download online, as well as in-person with physical copies also available in public libraries around the Borough and at the Council Offices during office hours. A survey was available on Commonplace for public response, which asked for comment on the document overall and the applicant self-assessment compliance checklists. There was also the opportunity to provide further comments or upload document(s) to support a response. The public could also provide feedback on the draft Code via email or by post. The consultation received 81 responses and these were fed into the Final Code (as detailed above).</p>