



**SPELTHORNE BOROUGH COUNCIL**

**CLIMATE CHANGE**

**SUPPLEMENTARY PLANNING DOCUMENT**

**TOWN & COUNTRY PLANNING (LOCAL PLANNING)  
(ENGLAND) REGULATIONS 2012 (AS AMENDED)**

**REGULATION 12 STATEMENT OF CONSULTATION  
JUNE 2026**

## PURPOSE OF THIS STATEMENT

1. This Statement of Consultation has been prepared in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). It sets out:
  - the persons and organisations consulted in the preparation of the update to the Climate Change Supplementary Planning Document (“SPD”), originally adopted in 2023.
  - the methods of consultation undertaken.
  - a summary of the main issues raised during consultation; and
  - how those issues have been taken into account in finalising the SPD.

## CONSULTATION UNDERTAKEN

2. Consultation was undertaken between Friday the 8 May 2026 and the 5 June 2026.
3. Notification of the consultation was sent via email on the 8<sup>th</sup> of May. It was issued to a mailing list held by the Council’s Strategic Planning Team. The mailing list comprised various individuals and organisations, including:
  - General consultation bodies identified in the Council’s Statement of Community Involvement (“SCI”), including voluntary bodies active in the local area, Neighbourhood Forums, and organisations representing the interests of different racial, ethnic or national groups, different religious groups, disabled persons, and persons carrying out business in the area.
  - Specific consultation bodies identified in the Council’s SCI. These include utility companies, government agencies, regional and local authorities and parish Councils.
  - Other prescribed bodies and stakeholders with an interest in planning policy matters within Spelthorne.
  - Organisations and individuals who have expressed an interest in receiving notifications relating to strategic planning matters in Spelthorne.
4. The draft SPD and supporting consultation materials were published on the Council’s website. The consultation was also hosted on the Council’s online engagement hub on Commonplace, which included an online survey to enable interested parties to submit representations.
5. Other ways for all stakeholders to respond to the consultation were made available, including by email to the designated Strategic Planning inbox [planning.policy@spelthorne.co.uk](mailto:planning.policy@spelthorne.co.uk), or alternatively by post to Strategic Planning, Council Offices, Knowle Green, Staines-upon-Thames, TW18 1XB

6. The consultation was publicised through the Council's social media posts, including Facebook, Instagram, LinkedIn and X.
7. Hard copies of the consultation documents were made available in the Council's main office and in the Borough's libraries.

## **MAIN ISSUES RAISED IN THE CONSULTATION AND THE COUNCIL'S RESPONSE**

8. In total, 16 valid representations were received from the public, including residents, local groups, statutory consultees and other interested external organisations, to this consultation. Internal comments from other departments within the Council were also received. 2 responses were also received from private individuals via Commonplace, which were not validated but provided respondent details.
9. Statutory consultees who responded to the consultation included:
  - National Highways
  - Natural England
  - Historic England
  - Surrey County Council
  - Elmbridge Borough Council
  - Waverley Borough Council
10. The key issues raised in the consultation are as follows:

### **STRENGTH OF REQUIREMENTS**

- Some calls for stronger and more enforceable standards for energy efficiency, water saving, sustainability and climate adaptation measures and some concerns about unclear and vague guidance and checklists. Respondents also reiterated that SPD requirements should remain proportionate, viable, and aligned with the adopted Local Plan.

### **FLOOD RISK AND WATER MANAGEMENT**

- Requests for stronger focus on groundwater, river and surface water flooding, including impacts on aquifers and drainage, alongside clearer developer guidance, mandatory mitigation measures, enhanced SuDS requirements, and greater consideration of groundwater effects.

## ENERGY, HEATING AND NET ZERO STANDARDS

- Suggestions for stronger energy guidance through recognised standards such as Passivhaus, LETI, NABERS and UK Net Zero Carbon Building Standards, alongside clearer requirements for heat pumps, district heating, renewable energy and energy storage. Respondents also reiterated the need to align with current regulations and Future Homes Standard requirements, while better distinguishing between residential and commercial standards.

## SUSTAINABLE TRANSPORT AND REDUCING CAR DEPENDENCE

- Strong support was expressed for active travel measures, including walking, cycling, EV charging infrastructure and travel hierarchy principles, alongside better public transport integration, uses and experiences and reduced reliance on private vehicles.

## GREEN INFRASTRUCTURE, AIR QUALITY AND CLIMATE RESILIENCE

- Support for urban greening, tree planting, green infrastructure and climate resilience measures, alongside calls for evidence-based greening and air quality assessments. Some calls for local food production through allotments, communal growing spaces and gardens.

## CLARITY, CONSISTENCY AND TECHNICAL ACCURACY

- Some identified greater consistency needed for definitions, technical terminology explanation, diagrams, checklists and acronym expansion. Formatting, typographical and other clerical errors should be amended.

## VIABILITY

- Some concerns that SPD requirements could exceed Local Plan policy and affect development viability, alongside calls for greater flexibility to reflect site-specific constraints, commercial uses and the scale of development.

11. The table below provides further detail on the responses received, sets out the Council's responses to the representations, and confirms the extent to which the SPD was amended to reflect them.

SPELTHORNE BOROUGH COUNCIL CLIMATE CHANGE SUPPLEMENTARY PLANNING DOCUMENT STATEMENT OF  
CONSULTATION- JUNE 2026

	REPRESENTOR	SUMMARY OF REPRESENTATION	COUNCIL'S RESPONSE	AMEND SPD?
1.	Elmbridge Borough Council (via email)	At this stage, we have no comments to raise but would welcome ongoing engagement as the work progresses.	Noted	None required.
2.	Natural England (via email)	Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.	Noted	None required.

SPELTHORNE BOROUGH COUNCIL CLIMATE CHANGE SUPPLEMENTARY PLANNING DOCUMENT STATEMENT OF CONSULTATION- JUNE 2026

3.	Mark Sitch obo SEGRO (via email)	<p>We are generally supportive of the approach proposed in the revised SPD.</p> <ul style="list-style-type: none"> <li>The reference to PassivHaus Certification on page 21 should specify that this applies only to residential developments, not commercial development.</li> <li>The Urban Greening Factor guidance on page 36 should clarify that the recommended score of 0.3 applies to predominantly commercial developments and excludes B2 and B8 uses due to their operational characteristics.</li> </ul> <p>Regarding the Energy Statement Checklist and Policy PS1:</p> <ul style="list-style-type: none"> <li>Concerns are raised that the SPD wording requiring developments to demonstrate “compliance” with energy principles is too prescriptive and exceeds the adopted Local Plan policy, which instead seeks to</li> </ul>	<p>Do not consider an exception should be made for commercial</p> <p>Is not considered necessary for clarity</p> <p>There is only one instance of “comply” on page 81</p>	<p>None required</p> <p>None required</p> <p>None required</p>
----	----------------------------------	---	---	--

SPELTHORNE BOROUGH COUNCIL CLIMATE CHANGE SUPPLEMENTARY PLANNING DOCUMENT STATEMENT OF CONSULTATION- JUNE 2026

		<p>“maximise” and “encourage” measures.</p> <ul style="list-style-type: none"> <li>• The requirement for applicants to justify measures not included, particularly on viability grounds, is viewed as potentially onerous and unsupported by policy.</li> <li>• It is suggested that the SPD should instead refer to “broad alignment” with the principles and the inclusion of site- and scheme-specific measures where appropriate.</li> <li>• The respondent supports the SPD’s recognition of carbon offsetting for residual embodied carbon emissions within the Construction &amp; Waste Checklist.</li> </ul> <p>Additional comments relate to the proposed Distribution Network Operator (DNO) requirements:</p> <ul style="list-style-type: none"> <li>• The respondent notes these requirements are not explicit within Policy PS1 and should not appear as mandatory planning policy requirements.</li> </ul>	<p>Noted</p>	<p>SPD will be amended for clarity to state 2.31: Developers should engage early with the DNO to determine whether:</p>
--	--	--	--------------	---

SPELTHORNE BOROUGH COUNCIL CLIMATE CHANGE SUPPLEMENTARY PLANNING DOCUMENT STATEMENT OF  
CONSULTATION- JUNE 2026

		<ul style="list-style-type: none"> <li>• They consider the information more relevant to DNO connection and capacity processes rather than planning applications.</li> <li>• The respondent argues such information should not be required within Energy Statements and that the planning system should rely on other consenting regimes operating effectively rather than duplicating their requirements.</li> </ul>	It is not “required” in the energy statement	None required
4.	Surrey County Council (via email)	<p>We are pleased to note the document is clear and comprehensive overall.</p> <p>It may be useful to align the document with the latest government position on clean energy, particularly for heat network zoning and the latest thinking on energy storage, flexibility and overheating.</p>	Noted	<p>Official government policy includes: CP30, WHP, current LA heat network zones (surrey not currently included) , clean flexibility roadmap, future homes standard. This is beyond the scope of the update but will be considered as part of the Local Plan immediate review.</p>



SPELTHORNE BOROUGH COUNCIL CLIMATE CHANGE SUPPLEMENTARY PLANNING DOCUMENT STATEMENT OF  
CONSULTATION- JUNE 2026

		<p>In Section 2.17 (“Be Green”), we note that where a district or site-wide heating system is not feasible, heat pumps or other low carbon efficient technology should supply heat. This should be mentioned in this section or the “Be Clean” section.</p> <p>The checklists at the end of the document are clear and concise. We suggest that HE3 is listed first in order to align the checklist with the energy hierarchy.</p>	<p>Noted</p> <p>Noted</p>	<p>Add a sentence after 2.16 reading: Where a district or site-wide heating system is not feasible, heat pumps or other low carbon efficient technology should supply heat.</p>
5.	<p>Historic England</p> <p>(via email)</p>	<p>English Heritage has no comments on the consultation documents.</p>	<p>Noted</p>	<p>None required</p>

SPELTHORNE BOROUGH COUNCIL CLIMATE CHANGE SUPPLEMENTARY PLANNING DOCUMENT STATEMENT OF  
CONSULTATION- JUNE 2026

6.	National Highways  (via email)	<p>The transport chapter of the Climate Change SPD sets a clear direction towards reducing transport-related carbon emissions by prioritising sustainable travel, integrating development with active and public transport networks, and promoting measures such as travel planning and electric vehicle infrastructure. It reflects a “avoid–shift–improve” approach, aiming to minimise car dependency while ensuring new developments are well-connected and designed to encourage sustainable travel behaviour.</p> <p>The document also shows how transport should work in practice within the neighbourhood, the street and the building focusing on proximity to public transport and promoting active travel.</p> <p>We have undertaken a review of the objectives set out in the SPDs and welcome the clear focus on reducing reliance on private vehicles and supporting a shift to more sustainable modes of travel. The overall approach is consistent with national policy objectives and conforms with Local Development Plans.</p> <p>The policies contained within the SPDs will not have a significant impact on the Strategic Road Network. Therefore, National Highways has no further comment to make regarding these documents.</p>	Noted	None required
----	--------------------------------------	--	-------	---------------

SPELTHORNE BOROUGH COUNCIL CLIMATE CHANGE SUPPLEMENTARY PLANNING DOCUMENT STATEMENT OF  
CONSULTATION- JUNE 2026

7.	Waverley Borough Council  (via email)	<p>Waverley welcomes the update to the Climate Change SPD and supports the objective of improving climate resilience and reducing carbon emissions from new development. The Council particularly supports the provision of practical guidance to applicants on sustainable construction and adaptation measures.</p> <p>It would be helpful to ensure that implementation expectations remain clear, proportionate and consistent with national policy and building regulations requirements, particularly where viability constraints arise.</p>	Noted	None required
8.	Private Individual (via email)	<p>The respondent provided feedback mainly highlighting need to improve clarity, consistency, accuracy, formatting, terminology and cross-referencing throughout the document. The respondent sought consistency with definitions of “major” and “minor” development, particularly regarding floorspace and site area thresholds.</p> <p>Particular change recommendations included:</p> <ul style="list-style-type: none"> <li>• Clarifying development classification thresholds.</li> <li>• Correcting technical inaccuracies and clerical errors.</li> <li>• Updating outdated references and broken links.</li> <li>• Improving readability and usability for applicants.</li> </ul>	Technical inaccuracies, clerical errors and inconsistencies noted.	SPD to be updated to be more consistent, technically accurate and ensure better clarity.

SPELTHORNE BOROUGH COUNCIL CLIMATE CHANGE SUPPLEMENTARY PLANNING DOCUMENT STATEMENT OF  
CONSULTATION- JUNE 2026

		<ul style="list-style-type: none"> <li>Ensuring correct alignment of diagrams, figures and checklists with the written guidance.</li> </ul>		
9.	Private Individual (via Commonplace)	<p>The respondent provided generally positive feedback on the revised draft SPD.</p> <p>They felt the document used clear and accessible language, commenting that it was “easy to fathom the general consensus,” and found the diagrams easy to understand. They also believed the checklist would help applicants.</p> <ul style="list-style-type: none"> <li>While they did not suggest specific changes to the SPD, they noted that “not everything is about targets” and encouraged the Council to consider the impact of policies on local people as well as broader national objectives.</li> </ul>	Noted	None required
10.	Private Individual (via Commonplace)	<p>The respondent was strongly supportive of the revised draft SPD overall, describing it as “excellent” and praising the clarity of the language, the diagrams and the use of examples from other towns.</p> <p>However, they expressed concerns about the level of attention to flood risk, particularly groundwater flooding in parts of Staines. They felt the references to flood risk in the checklist were too vague and called for clearer, more detailed guidance for developers on mitigating both river and groundwater flooding, including</p>	Noted	None required

SPELTHORNE BOROUGH COUNCIL CLIMATE CHANGE SUPPLEMENTARY PLANNING DOCUMENT STATEMENT OF  
CONSULTATION- JUNE 2026

		reducing impacts on aquifers and groundwater pressure. The respondent specifically referenced Dr Jonathan Paul's report in relation to groundwater risks.		
11.	Private Individual (via Commonplace)	The respondent provided positive feedback on the revised draft SPD. They agreed that the document uses clear and accessible language and felt that the checklist would help applicants apply the guidance.	Noted	None required.
12.	Private Individual (via Commonplace)	The respondent provided generally positive feedback on the revised draft SPD. They indicated that the document mostly used clear and accessible language, although their additional comment suggested it was only clear "to some extent." They also found the diagrams easy to understand and sufficiently detailed. The respondent was uncertain about whether the checklist would help applicants.	Noted	None required.
13.	Private Individual (via Commonplace)	The respondent provided positive feedback on the revised draft SPD, agreeing that the document uses clear and accessible language and that the checklist would be helpful for applicants.	Noted	None required.

SPELTHORNE BOROUGH COUNCIL CLIMATE CHANGE SUPPLEMENTARY PLANNING DOCUMENT STATEMENT OF  
CONSULTATION- JUNE 2026

14.	Private Individual (via Commonplace)	<p>The respondent was broadly positive about the revised draft SPD, describing it as a 'comprehensive document'. They considered the language, technical explanations, diagrams and checklist to be clear, accessible, and useful for applicants.</p> <p>However, they suggested that the SPD should place greater emphasis on the impact of climate change on food production. They highlighted the importance of localising food production in the same way the SPD addresses local energy generation and storage. The respondent advocated for recognition of spaces for growing food, such as private gardens and communal allotments, reflecting the approach taken by earlier planners.</p>	Noted	None required.
15.	Private Individual (via Commonplace)	<p>The respondent expressed general support for the revised draft SPD. They felt the document was clear and accessible, confirming that the language, technical explanations, and diagrams were easy to understand. They also agreed that the checklist would be helpful for applicants.</p>	Noted	None required.
16.	Private Individual (via Commonplace)	<p>Generally supportive of the revised draft SPD, describing the language, diagrams, and checklist as clear, accessible, and helpful and particularly welcoming the inclusion of the checklist.</p> <p>However, they noted they would have preferred a Climate Crisis SPD. They also highlighted challenges experienced as a heat pump user in Spelthorne, particularly difficulties accessing</p>	Noted	None required.

SPELTHORNE BOROUGH COUNCIL CLIMATE CHANGE SUPPLEMENTARY PLANNING DOCUMENT STATEMENT OF CONSULTATION- JUNE 2026

		trustworthy advice on low-carbon heating options, such as air source heat pumps versus solar energy. They suggested the Council could consider providing advisory services, or endorsing trusted installers and advisers, to give residents greater confidence when improving their homes.		
--	--	--	--	--

## NEXT STEPS

12. The Council has considered all responses received to the consultation and has made a number of corresponding amendments to the update to the Climate Change SPD.
13. A final version of the SPD will be presented to a Council Meeting on the 29 June for adoption.