

Emerging Spelthorne Local Plan – Major Modifications (MMs) Consultation
April/ May 2025
Response from the Colne Valley Regional Park (CVRP) - May 2025



The CVRP made representations in respect of a number of policies and proposals at the Local Plan submission stage in 2022. This included appearing at the examination in 2023 concerning the Policy SP5 (CVRP) to support its inclusion whilst making suggestions to improve the policy wording.

Our representations on the proposed MMs

Policy SP5:

At the hearing on Policy SP5 (CVRP) agreement was reached on adjustments to the Policy and **we support MMs 34, 35 and 36** to Policy SP5 which makes this policy more sound.

Policy SP7:

We support MM 43 which makes this policy clearer, more sound and more effective.

Policies ST4/-25 and ST1/043:

We maintain our objections in relation to the Site Allocations (and related policies) in respect of ST4/025 (**Coppermill Rd**) and ST1/043 (**London Road**) and note that the MMs¹ affecting these sites in the Green Belt and CVRP do not amount to their deletion, which we requested.

Our representations also highlighted a very **important aspect of NPPF policy** that should apply to both sites if they are to be allocated, namely:

“We also highlight that no compensatory improvements to the environmental quality/ accessibility of remaining GB land are allowed for, in line with NPPF Para 142. This seems to be an absent feature from allocations being made in the Green Belt.”

We therefore object that the MMs proposed do not go far enough and this means that this part of the Plan would not be sound in relation to national (NPPF) planning policy.

Whilst our objections to these allocations in the CVRP go to the principle of allocation, if they are to be allocated consistency with national policy (former para 142) is important for the soundness test. Providing for the improvement of remaining GB land in these cases is also important for the enhancement of the CVRP which is the policy of Spelthorne Borough Council.

We are conscious that **there is also an issue of which version of the NPPF the Plan needs to be consistent with**. The Plan was submitted under the ‘old’ NPPF which contained the para 142 we referred to. But, since then, in December 2024, a new NPPF has been published which changes this aspect of national policy, heralding the introduction of the ‘Golden Rules’ applying to housing allocations in the Green/ Grey Belt. Neither para 142 nor the golden rules appear to have been taken into account in the modifications proposed to the Plan. **The plan needs to provide for more mitigation than it is doing**, either way. Can this please be addressed?

The CVRP Trust, a charitable environmental organisation, will be **happy to work with you** on the necessary changes, notwithstanding our objections in principle. Please contact SPomeroy@groundwork.org.uk or jerryunsworthplanning@gmail.com in the first instance.

¹ MM119 (sustainable transport for ST1/043, ST4/025 and others) and MM121 (flooding and safe access routes for ST4/025 and others)