

Reference: AF16490E

Re-advertisement of 'submitted' Development Plan Documents with proposed amendments

6 March - 17 April 2008

Representation Form



To find out how the information on this e-form will be used, please read our Privacy Policy:
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Date completed

You are strongly advised to read the accompanying guidance notes before completing this form

PLEASE NOTE: THERE IS NO NEED TO REPEAT REPRESENTATIONS MADE DURING THE PREVIOUS SUBMISSION STAGE CONSULTATION PERIOD AS THESE REMAIN VALID. IF YOU INTEND TO REPLACE OR AMEND AN EARLIER REPRESENTATION PLEASE MAKE THIS CLEAR IN YOUR RESPONSE

Is this representation on

Is this representation Amending your submission stage representation
If totally replacing please give Customer ref no.

Do you wish to be notified of the publication of the Inspector's report?

Do you wish to be taken off our database?

If an agent is appointed, please complete only the Title and Name boxes below but complete the full contact details of the agent in 2.

1. Personal details

Title
First name
Last name
Job title (where relevant)
Organisation (where relevant)
Address

2. Agents details

Title
First name
Last name
Job title (where relevant)
Organisation (where relevant)
Address

County
Postcode
Telephone number
E-mail address

County
Postcode
Telephone number
E-mail address

3. Did you raise the matter that is the subject of your representation with the LPA earlier in the DPD process?

The annex and the guidance notes have more information on the tests of soundness.

4(a). Do you consider the DPD is:

4(b). If you consider the DPD is **unsound**, please identify which test of soundness your representation relates to (having regard to test numbers 1-9 listed in the Annex). **Please note you should complete a separate form for each test you consider the DPD fails.**

Soundness Test no (see Annex):

5. To which part of the DPD does your representation relate?

6. Please give details of what change(s) you consider necessary to make the DPD sound, having regard to the test you have identified at 4. above. You will need to say why this change will make the DPD sound. Please be as precise as possible

ALLOCATIONS DPD

We believe that allocations should be made now (2008) for the period beyond 2016. In order to provide a clear a "Development Framework" for the Borough for the period to 2026 – which can be monitored and reviewed as provided for within the Plan.

Approximately 50% of the Council's housing supply numbers are reliant upon the delivery of windfall sites. This is contrary to PPS3. Once these figures are "stripped" from the projections and account is taken of the likely upward adjustment in the figures required through the emerging South East Plan, it will be clear that an insufficient number of sites have been allocated.

Given the constraints and lack of well configured, well located, developable and deliverable sites within the urban area, the allocation search should look beyond to brownfield sites within the Green Belt.

We believe that Notcutts Garden Centre, Staines Road, Laleham should be included as an identified allocated housing site in the Plan, for development during the period 2016 to 2026.

The Sustainability Appraisal Report, previously carried out, stated that the Notcutts site, (reference P/025/H) was rejected primarily because development would have an adverse impact upon greenfield land and that it was not previously developed land. It was suggested that not taking the site forward would support maintaining the landscape and openness.

This statement as we have previously submitted is wholly incorrect. The Notcutts' site is currently developed as a retail Garden Centre and is therefore a brownfield site within the Green Belt, bounded on two sides by existing housing. The Green Belt land "behind" the Garden Centre is not visible to the public as it is completely hidden by the main Garden Centre building.

In its current use the site does not fulfil the Green Belt functions however re-development would offer the opportunity to create a design to open out the site, allowing vistas of the green land beyond and indeed possibilities of public access to it. Additional opportunities would arise offering possibilities for formal open space and the ability to

nurture new wildlife habitats.

Sustainability appraisals have identified as a key issue that development should be ruled out where it would have an adverse impact on greenfield sites within the Green Belt. This would not be the situation here, where development would be on a brownfield site, development of which could facilitate improved access and vistas to greenfield sites within the Green Belt.

We have studied the relative merits of the allocation sites and we would submit that Notcutts Garden Centre, Staines Road, Laleham provides the opportunity to meet many more of the DPD objectives than several of the alternatives:

Notcutts Garden Centre, Staines Road, Laleham:

- Is an existing developed site which although within the Green Belt can facilitate improved access to it through re-development
- Is situated within an existing residential area.
- Is accessible by bus to Staines town centre, is within close walking distance to a primary school and within cycling distance to a secondary school.
- Is capable of providing a good quality residential environment, suitable for starter family housing, not limited to flats.
- Re-development for housing would improve upon the existing position relating to traffic flows (including heavy goods) and improve upon the environment for existing residents.
- Re-development to facilitate the provision of further public open space.
- The site is of a sensible configuration and capable of producing an attractive residential scheme which, by nature of their configuration, several of the alternatives are not.
- The majority of the site is within flood zone 2 and thus acceptable for housing.
- The site is deliverable.

It is not:

- A major loss of prime employment land.
- Within a poor air quality hot spot, nor is it subject to excessive noise pollution.
- In a location more appropriate for employment, civic or retail use.

In accordance with this, following receipt of satisfactory flood and environmental impact assessments, Notcutts, Staines Road, Laleham should be included within the allocations DPD as an allocated site.

7. Can your representation seeking a change be considered by written representations or do you consider it necessary to participate at the oral part of the examination?

Written representations

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination
Annex A : Failure to meet a Soundness Test

1. It has not been prepared in accordance with the authority's Local Development Scheme (LDS).