

**Spelthorne Development Plan  
Supporting Statement**



## **1. Introduction**

1.1 This statement provides background information on three issues relating to the Core Strategy and Policies Development Plan Document:

1. The inclusion of strategic and detailed policies.
2. “Saved” policies.
3. Derivation of the Core Strategy.

## **2. Strategic and Detailed Policies**

- 2.1 At the outset of preparing the new Local Development Framework the Council was conscious that its existing Local Plan, which was adopted in April 2001, was becoming out of date. It had been prepared with an end date at 31 March 2006. There was therefore a need to substantially replace the issues covered by the Local Plan to ensure comprehensive policy guidelines, although there were a few policies that could be 'saved'. This background was explained in the Council's first Local Development Scheme agreed by the Secretary of State in October 2004.
- 2.2 For the above reasons it was decided that both the core strategy matters and detailed policies needed to be quickly brought forward together. Government guidance (PPS12, para 2.28) allows detailed policies to be set out within the core strategy and this was judged to be the most appropriate way to present this material in Spelthorne rather than in separate DPDs.
- 2.3 The presentation of policies in one document also reflected the Council's judgement of what is the most effective way of communicating the planning policies for Spelthorne. The format of a single document allows people to find policy guidance in one place and enables a comprehensive policy approach to be presented and understood by the user.
- 2.4 The Core Strategy and Policies DPD itself has been structured so that after each of the seven strategic policies are the relevant detailed policies. This also includes the relevant 'saved' Local Plan policies. This structure is designed to further assist the Council's wish to ensure the DPD effectively communicates the guidance it contains.

### 3. “Saved” Policies

- 3.1 The submission plan reproduces for information a number of policies from the Spelthorne Borough Local Plan (2001) that the Council is proposing to save after adoption of the Core Strategy and Policies DPD. These are:
- Policy GB1 (Green Belt) including the Green Belt boundary.
  - Policy RU11 (Sites of Nature Conservation Importance (SNCIs)) including the notation for such sites on the Proposals Map.
  - Policy RU14 (Development affecting the nature conservation interest of a site).
  - Policies BE24, BE25 and BE26 (Ancient Monuments and Archaeological Sites) including associated notations on the Proposals Map.
- 3.2 The intention to save these policies after the adoption of the new LDF was set out in the Council’s original Local Development Scheme of October 2004 and in a revision of March 2005, both of which were agreed by the Government Office. (The Council is also saving two policies and five site specific proposals in the Local Plan up to the respective adoption of the Core Strategy and Policies DPD and the Allocations DPD)
- 3.3 In August 2006 the Government wrote to local authorities setting out a protocol to be followed in requesting extension of saved policies. Under the terms of this protocol a submission was made in October 2006 to save the policies concerned.
- 3.4 A formal response has not yet been received and the Council understands that a response to all local authorities is unlikely until close to the deadline when Local Plans expire at the end of September. The informal response from GOSE has been favourable.
- 3.5 The reason for saving the policies are as follows:
- Policy GB1 (including Green Belt boundary). The current boundary was adopted in the 2001 Local Plan and is up to date. Both the Surrey Structure Plan and the draft South East Plan contain policies to retain and protect the Green Belt in this area. No other planning issue arises from either document that requires the Green Belt boundary to be amended in Spelthorne. To contemplate a change in the Green Belt would be contrary to guidance in national policy, the South East Plan and the Structure Plan with which the Council’s LDF must be in conformity.
  - Policies RU11 and RU14. The designated sites are based on survey work by the Surrey Wildlife Trust and assessment against county-wide criteria by the Surrey Nature Conservation Liaison Group. The policies and designations are consistent with Government guidance in PPS9 Biodiversity and Geological Conservation.
  - Policies BE24, 25 and 26. The policies and designations are consistent with PPG16 Archaeology and Planning and the designations are based on detailed study by the County Council’s archaeologist.

- 3.6 The saved Local Plan policies will sit alongside the policies in the Core Strategy and Policies DPD as part of the development plan for the Borough. In order to show the relationship between new and saved policies it was decided to reproduce the saved policies for information within the Core Strategy and Policies document. This approach was followed in the Preferred Options document and has been carried forward into the Submission Document.
- 3.7 The saved policies are not part of the DPD and are not therefore subject to representations. In order to clearly distinguish them from the DPD policies they are labelled in the document as “saved” and printed in italics.

# 4. Derivation of the Core Strategy and Policies

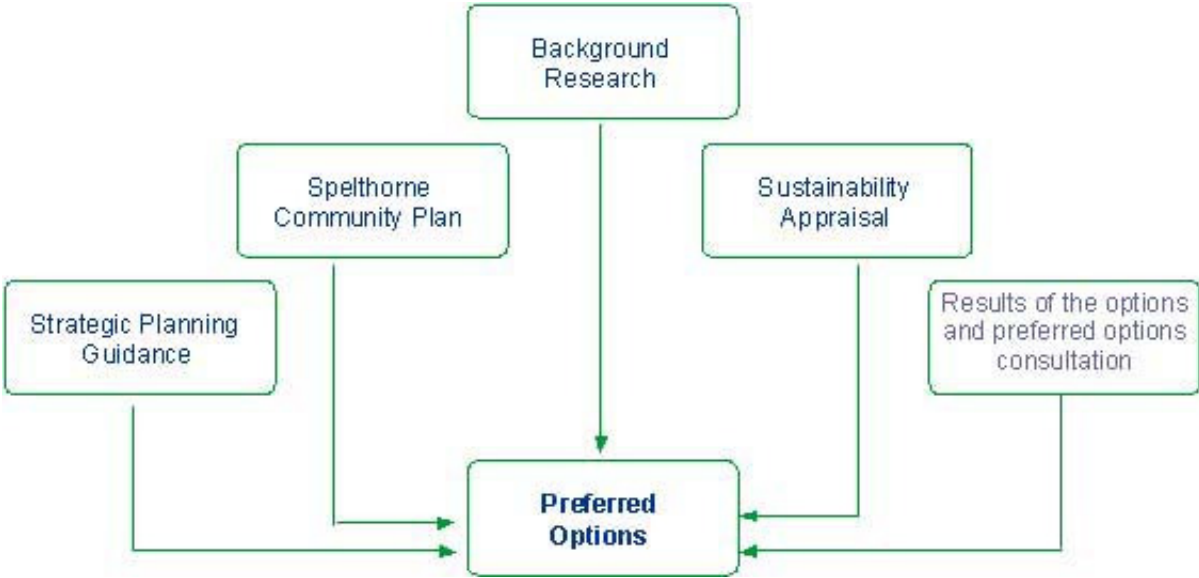
## 4.1 Introduction

4.1.1 A wide range of factors have influenced the development of the core strategy and policies submission document. Key influences are explained in this section under the following headings:

- a) **National and Strategic Planning Guidance** – with which we have to be in conformity.
- b) **The Spelthorne Community Plan** - the wider plan for the community with which we need to be consistent.
- c) **Background research** - on issues relevant to the new plan.
- d) **The sustainability appraisal** - in which we tested policy options against the principles of sustainable development.
- e) **Results of Consultations** - views on the options on which we consulted, including the preferred options.

4.1.2 Account was also taken of other plans, policies and programmes. These are listed in the Sustainability Appraisal and also referred to where relevant in the justification for individual policies.

**Figure 1 What influenced the development of the Core Strategy and Policies**

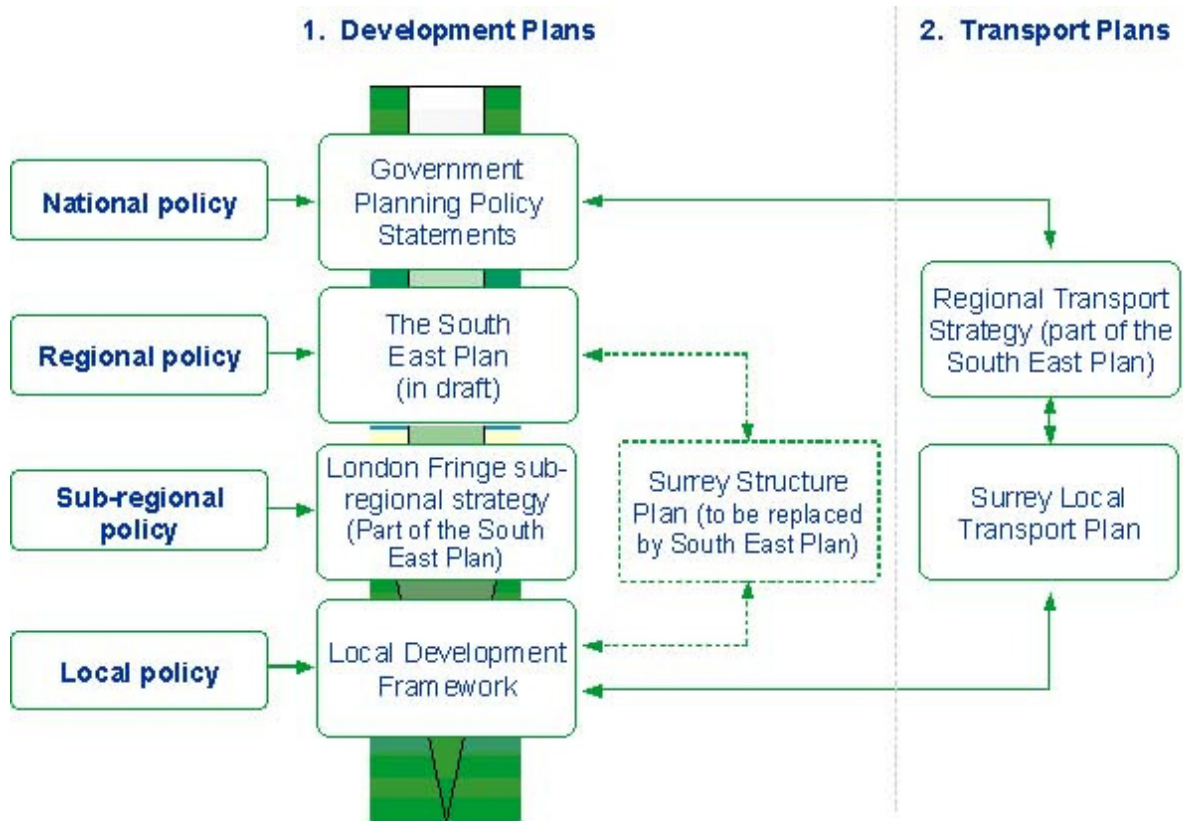


## 4.2 Strategic Planning Guidance

4.2.1 It is a Government requirement that Local Development Framework policies conform with relevant national, regional and sub regional policies. Regional and sub regional policies themselves have to conform with national policy guidance. The basic

requirement in the “chain of conformity”, therefore, is for Local Development Frameworks to conform with policies at a regional and sub regional level (see figure 2).

**Figure 2 The Chain of Conformity**



Planning policies at each level need to be 'in conformity' (i.e. consistent) with the level above

- 4.2.2 The current position is made more complex because the new South East Plan is not yet adopted and so in legal terms has not finally replaced earlier regional planning guidance in RPG9 or the Surrey Structure Plan. Additionally some revisions have been made to Government guidance since the draft South East Plan was produced.
- 4.2.3 In finalising the Core Strategy most weight has been given to the emerging South East Plan because it has now reached an advanced stage towards final adoption and is the most up to date document. This has influenced the timescale for the Core Strategy and Policies DPD in that the South East Plan looks beyond the existing Regional and Structure Plan end dates of 2016 to cover the period up to 2026. To be consistent with the new plan a decision was taken to also extend the period for the Council’s Core Strategy and Policies DPD up to 2026.
- 4.2.4 Both the adopted Structure Plan and the draft South East Plan have been relevant considerations in the production of the submission plan. The South East Plan is a region-wide plan that also includes more detailed provisions for sub regions, with Spelthorne being included in the “London Fringe” sub region.

- 4.2.5 The relevance of the Structure Plan has become more limited as the more up to date draft South East Plan has advanced. Additionally, under the new legislation the Structure Plan will expire in September 2007, apart from any policies that the Secretary of State may agree can be “saved” beyond that date.
- 4.2.6 A further complicating factor is the continuing development of planning policy at a national level. The draft South East Plan provides a strategic framework for planning in Spelthorne taking account of Government guidance at the time of its production, but changes have been made since it was produced which also post date the “preferred options” stage for this document. Two key changes are:
- a) Production of Planning Policy Statement 3 (PPS 3) on Housing in November 2006. This has been supplemented by practice guidance. Draft guidance on housing market areas was published in December 2005. Guidance on strategic housing market assessments and an advice note on identifying sub regional housing market areas were both published in March 2007, together with an advice note on housing market information. Practice guidance promised on strategic housing land availability assessments had not been published at the time of finalising this report.
  - b) Production of Planning Policy Statement 25 (PPS 25) on Development and Flood Risk published in December 2006. This is supported by a practice guide published in February 2007.
- 4.2.7 Paragraph 6 of PPS 3 and the letter to local authorities accompanying the PPS both state that authorities should consider the extent to which emerging local development documents can have regard to the policies in the statement whilst maintaining plan-making programmes. Additional research carried out in response to the new guidance is explained under “Background Research” in part 4 of this report.
- 4.2.8 Key requirements from the draft South East Plan are set out in Table 1 below.

**Table 1 Key Requirements from the draft South East Plan**

- Should support development of Heathrow within currently agreed levels of growth and take account of airport master plans
- Need for restraint based parking standards
- Inappropriate development not to be allocated or permitted in zones two or three of floodplain unless overriding need and no alternative. Where development proposed Strategic Flood Risk Assessment required.
- Require design and construction which minimises waste through re-use of materials and promotes designs that provide adequate space to facilitate storage, re-use, recycling and composting.
- Staines is included in a network of town centres to be the focus for major retail and other development. Strategies also required for smaller centres
- Positive measures needed to tackle poverty and poor health, including housing and other needs of an ageing population.
- Plans should encourage increased participation in sport recreation and cultural activity.
- Policy on education and skills should advocate greater participation through better accessibility and increased education and skills provision.

### **Extra requirements from the London Fringe Sub Regional Strategy**

- Needs to be met as far as possible within constraints of the Green Belt and urban potential.
- Requires provision for an extra 3,020 dwellings in Spelthorne (2006-26), equivalent to 151 dwellings per annum. This will replace the Structure Plan housing provision.
- 40% new housing to be affordable

Note: The draft South East Plan is subject to final approval by Government.

4.2.9 Strategic planning policies require provision to be made for necessary development, setting specific targets for some forms of development, notably housing. They establish a strong urban focus aiming to make the most effective use of urban land, while continuing to protect the Green Belt. Maintaining and improving environmental quality is also an important theme and energy conservation and provision for renewable energy are emerging themes.

4.2.10 The process of preparing the South East Plan included the establishment of a series of sub regional groups to identify issues and bring forward strategies for each of the sub regions. Spelthorne is part of the London Fringe sub region and its advisory group, which included representation from adjoining South East Region authorities and also from the Greater London Authority and the Association of London Government (on behalf of the London Boroughs). This enabled relevant issues from outside the area to be taken into account in preparing the strategy for the sub region and also provided a basis for identifying relevant issues from outside the area to be taken into account in preparing Spelthorne's Core Strategy.

4.2.11 The Council has continued to monitor developments and emerging plans in neighbouring areas inside and outside London so that any issues relevant to the emerging core strategy can be identified. An update of the latest position will be prepared after submission and well in advance of the examination hearing.

4.2.12 The Local Development Framework also has to be consistent with the County Council's Local Transport Plan (or LTP). The second LTP was published in 2006. Its strategy is based on managing the demand for travel and getting the best out of the existing transport network. The main elements are:

- i. Tackling congestion
- ii. Increasing accessibility
- iii. Improving safety and security
- iv. Enhancing the environment and quality of life
- v. Improving maintenance of the transport network

4.2.13 Major projects included in the LTP affecting Spelthorne are:

- i. Walton Bridge replacement. This scheme has provisional funding for 2006-2011. Following the failure to confirm compulsory purchase orders a revised planning application together with revised orders for the scheme is anticipated later in 2007.
- ii. The Airtrack project for a rail link from Staines to Heathrow.

### 4.3 The Spelthorne Community Plan

4.3.1 The Spelthorne Community Plan has been produced by the Local Strategic Partnership (LSP), which has members from the public, private, voluntary and community sectors. It is approved by the Council. The aim of the LSP is:

“To make Spelthorne a safe, healthy, inclusive, prosperous and sustainable community”

4.3.2 The plan, which covers the period 2005-2015, sets out how the partners intend to improve the social, economic and environmental well-being at the Borough. It has targets relating to six themes:

- Safer Spelthorne - Building a safer Spelthorne
- Young people’s Spelthorne - Involving young people so that they are all engaged and given every opportunity to succeed
- Getting around Spelthorne - Developing an integrated, sustainable and effective transport system for all.
- Healthy Spelthorne - Improving health and social care with appropriate services available for everyone.
- Thriving Spelthorne - Making Spelthorne a thriving place where all people feel proud to live, work and play.
- Learning Spelthorne - Providing opportunities for lifelong learning so everyone achieves his or her full potential.

4.3.3 A seventh theme, Inclusive Spelthorne, is incorporated within the other themes and is underpinned by an equalities statement, adopted by the LSP.

4.3.4 Spelthorne Borough Council has identified four corporate priorities reflecting its role in implementing the Community Plan. These are:

- Making Spelthorne safer
- Engaging younger people
- Making Spelthorne a better place
- Improving customer satisfaction

4.3.5 The aim of making Spelthorne a better place, which links to many of the Community Plan themes, is particularly relevant to the Local Development Framework. The LDF can also make a contribution to meeting the needs of young people and, through best practice in design, help make Spelthorne safer.

4.3.6 In developing the Community Plan account was taken of Surrey County Council’s Community Strategy “Surrey 2020” produced in 2004. The vision for Surrey 2020 is that it will be a;

“County of distinctive, confident, caring, creative and safe communities, where individuals and organisations have taken responsibility for resolving the many challenges that the county faces”.

4.3.7 The County Council are represented on the LSP and the Spelthorne Community Plan reflects and complements the vision of the County Plan.

4.3.8 The Local Development Framework needs to reflect the priorities of the Community Plan and to do what it can to help bring about their delivery.

#### 4.4 Background Research

4.4.1 The Council has carried out a series of studies to ensure the new local development framework is based on an understanding of the issues it needs to tackle. The research is published in a series of documents that are available separately. They are briefly summarised below:

- i. **Population and Social Characteristics (February 2005)** - This covers trends in population and households. It shows a trend towards more smaller households and more elderly people while the overall population size is relatively static. It also shows significant variations in levels of affluence across the Borough with pockets of relative deprivation in parts of Stanwell and Sunbury Cross. An **Update** to the population projections was published in April 2007. This extended the forecasting period to 2026 and suggested the trends identified in the main report would broadly continue.
- ii. **Housing Land Availability Assessment (February 2007)** – An assessment was carried out of the availability of land for further housing development within the existing urban area of the Borough taking account of policy constraints such as Green Belt, area liable to flood and protection of urban open space. The study updates earlier work on housing capacity published in 2003 and 2005 and also takes account of Government guidance on housing land availability assessments published in December 2005. The 2007 study, which covers the period of the South East Plan up to 2026, shows sufficient capacity is available to meet the Borough’s housing provision.
- iii. **Housing Market Assessment (January 2007)** – This report has been structured to take account of draft guidance on housing market assessments published in December 2005 and current at the time of the report’s publication. It sets out the findings of a housing needs assessment by David Couttie and Associates commissioned in 2005 and completed in December 2006. The report shows a continuing need for affordable housing and for more small dwellings and also shows that the Borough’s existing housing stock is in generally good condition. The report pre-dates the publication of guidance on strategic housing market assessments in March of this year. In view of the technical work already completed, and Government guidance in paragraph 6 of PPS 3 (see para 2.7 above), a decision was made not to delay the Local Development Framework to give time to complete a further assessment in strict accordance with the latest Government guidance. In addition none of the adjoining authorities were in a position to undertake a joint study at the time the Council would have needed to prepare one.
- iv. **Economy and Employment Land (May 2006)** - This examines trends in the workforce and the local economy and looks at future needs for employment land. It reviews existing employment land to identify which sites and locations are best suited to modern needs. An **Update** incorporating the latest employment demand forecasts to 2026 was published in May 2007. This suggests the trends identified in the main report would broadly continue.

- v. **Retail Study (August 2004)** - This assesses future retail floorspace requirements and shows growth in demand primarily for non-food retailing. It suggests further development in Staines town centre would be most consistent with Government guidance and attractive to retailers. The study also reviews the vitality and viability of existing town centres. An **Update** to the retail floorspace forecasts was published in April 2007. This suggests there is less capacity for further growth in Staines up to 2016 but then increasing capacity in the longer term, though subject to uncertainty over long term forecasting. A separate report on **Non Retail Uses in Shopping Areas** has also been produced (April 2007).
- vi. **Open Space Study (September 2005)** - This study included work by consultants PMP and reviews existing public open space in the Borough and identifies areas of deficiency in the light of recommended local standards.
- vii. **Affordable Housing (April 2007)** – This study examines the scope for amending policy to increase provision of affordable housing and the possible implications of change for the viability of development. It draws on advice from valuation consultants Campsie and Co.
- viii. **Strategic Flood Risk Assessment** – This study is presented in two reports. The first was carried out by Jacobs Babbie and completed in December 2006. It largely took account of draft PPS 25, which was current at the time, but also anticipated much of the content of the final guidance. The report describes the technical work carried and shows the extent of the Borough that is liable to flood. A second report dated February 2007 takes account of PPS 25 as published. It relates the sequential approach to development, of avoiding areas of flood risk, to other considerations involved in achieving a sustainable pattern of future development for the Borough. Both reports assess measures to reduce flooding in Spelthorne. Detailed flood risk assessments have also been produced for the Elmsleigh Centre and Bridge Street car parks sites in Staines (Allocation Sites A9 and A10).
- ix. **Transport Statement (February 2007)** – This report provides a high level transport assessment of the policies and proposals in the emerging Core Strategy and Policies and Allocations Development Plan Documents. The brief for the study and the final report were agreed with both the Highways Agency and Surrey County Council.
- x. **Air Quality** – The whole of Spelthorne is designated as an Air Quality Management Area. It is particularly affected by two pollutants, NO<sub>2</sub> and PM<sub>10</sub>, which are present at high levels in certain parts of the Borough. The preparation of the plan has had regard to an extensive evidence base of which the latest report is by consultants CERC – “Detailed Air Quality Assessment for Spelthorne” (April 2006). This provides an authoritative position statement.
- xi. **Hotels** – Preparation of the plan has had regard to a consultants report “Surrey Hotel Futures” (September 2004)

## 4.5 Sustainability Appraisal

- 4.5.1 A process of sustainability appraisal was used to help in evaluating alternatives, selecting the preferred options and finalising the submission document. The Council has been assisted in this work by Tom Jones, an independent environmental consultant. Sustainability appraisal enables plans and policies to be tested to see how well they perform against economic, social and environmental objectives. It helps in developing policies that work towards achieving sustainable development, offering economic, social and environmental benefits.
- 4.5.2 Reports have been produced at each stage of the process towards submission. These are:
- Sustainability Appraisal Scoping Report 2005 (at the start of the process)
  - Sustainability Appraisal Progress Report 2005 (at the options stage)
  - Sustainability Appraisal Report 2006 (of the preferred options)
  - Sustainability Appraisal Report 2007 (of the submission plan)
- 4.5.3 A separate report, known as an “**Appropriate Assessment**”, has been produced evaluating the effects of the plan on sites of international importance for nature conservation.

## 4.6 Results of Consultations

- 4.6.1 To ensure the views of the community were taken into account in developing the submission documents public comment was sought at the key stages of the process. The first major consultation (under Regulation 25 of the Regulations governing plan preparation) was on issues and options for the future of the Borough. This consultation was in two parts:
- i. In October/November 2004 people were asked what the issues were the new plan needed to tackle. Responses were set out in the document entitled “Initial Consultation” (February 2005)
  - ii. In September/October 2005 views were then sought on issues and options including a draft vision and objectives under the heading “What should we be trying to achieve” and also on a series of options for the plan. These were developed taking account of the issues identified through the earlier consultation and also taking account of the background research referred to above. The findings were presented in the “Report on the Issues and Options Consultation” (May 2006)
- 4.6.2 The above reports include details of the consultation methods together with the detailed results.
- 4.6.3 Responses to the Issues consultation suggested five main concerns:
- Protecting the Green Belt
  - Tackling traffic congestion
  - Not building in flood risk areas
  - Protecting open space
  - Concerns about over development

- 4.6.4 In the Options consultation there was broad support for the draft vision and objectives. Options for the future development of Spelthorne were presented as a series of questions covering the main issues the core strategy of the plan needed to address. The questions and the response to each are summarised below:
- 1) **Where should we build?** There was strong support for the view that development should avoid Green Belt and Flood Plain.
  - 2) **What should be the balance between the number of homes and space for businesses?** Most respondents supported the option of keeping enough of the best commercial sites to meet the needs of the workforce and only allowing other commercial sites to be redeveloped for housing.
  - 3) **What sort of houses should we build?** There was support for both maintaining and for increasing the proportion of affordable housing, with a slight preference for the status quo. A majority favoured a greater proportion of small dwellings and there was support for higher density subject to good design to blend with the local environment. The housing needs of young, single people and first time buyers and elderly people were most frequently highlighted as priorities.
  - 4) **How can we provide sufficient services and facilities to support new development?** Most respondents thought all new development should contribute to the cost of extra services and facilities.
  - 5) **How should our town centres develop in the future?** The majority view supported further expansion of Staines, although a significant minority disagreed. There was strong support for maintaining the other local centres in the Borough and that loss of shops should be resisted in these centres.
  - 6) **How should we tackle traffic congestion?** Most respondents favoured locating development that generates traffic where it is accessible by non car-based modes and requiring development to include measures to encourage less car use. There was also support for a rail link from Staines to Heathrow if the environmental impact can be made acceptable. Traffic issues generated the greatest number of unprompted comments, highlighting the importance of the traffic congestion issue. Staines was mentioned most frequently, though there were also references to congestion at Sunbury Cross, parts of Ashford, Green Street, Sunbury and Walton Bridge. There were also calls for improvements to public transport. Policies towards new development in the LDF can only be part of the solution to traffic congestion and there will also need to be work with the County Council to address wider traffic issues.
  - 7) **How can we improve the environment?** There was strong support for measures to improve landscape, protect public open space, improve the environment in more deprived areas, promote higher standards of design and reduce energy use.
- 4.6.5 Consultation also took place in September/October 2005 on options for specific sites. The results of this consultation, which fed into the preferred options proposals document, are included in the May 2006 report on the Options consultation.

- 4.6.6 The second major consultation was on the preferred options in May 2006. This followed the procedures set out in the submission draft of the Council's Statement of Community Involvement, which has since been adopted following an independent examination. The Preferred Options document set out initial views on the wording of strategic and detailed policies and consultees were invited to comment. The overall number of responses was lower but the level of detail in comments received was generally greater than at previous stages. A separate document was produced on Preferred Options for site allocations.
- 4.6.7 Comments received were very diverse. The Report on the Preferred Options Consultation (April 2007) summarizes representations and classifies them by policy. While some respondents were advocating changes at odds with majority views on strategic options (for example landowners seeking the release of Green Belt land) a number of respondents made positive suggestions that, as can be seen from the report, led to changes in the wording of policy between the Preferred Options and Submission documents.