Local Plan
Spelthorne Takes Shape

What is this consultation about?

The Council is consulting on a new Local Plan for the Borough, which will set out how much development we need for the next 15 years and where it should go. The finished Local Plan will contain policies for deciding planning applications and allocated sites for housing, employment and other forms of development.

This paper sets out the key issues affecting Spelthorne and the options we should consider for how to meet our needs. These issues are not just those we are currently experiencing but what our future may look like in 2035. The paper identifies the challenges and constraints for development but also the opportunities Spelthorne offers for growth.

Whether you are a resident, worker or business owner in Spelthorne, we want you to have a say in shaping your Local Plan.

Why do we need a new Local Plan?

Our current Local Plan comprises the Core Strategy & Policies, which was adopted in 2009. Since then, the National Planning Policy Framework (NPPF) was published in 2011, which provides policy guidance to all local planning authorities, including how local plans should be prepared. All local plans need to conform to the NPPF but as our Core Strategy predates it, we are not able to rely on it for key items such as housing targets. Without an up-to-date Local Plan, we are less able to plan positively for the Borough and risk planning decisions being taken out of our hands.

We know that decisions to increase built development, especially when they result in the loss of green spaces, are not always well received but making positive choices is preferable to having choices made for us. That way, we can plan for the infrastructure required to support new development. This new development will bring much needed local homes, jobs and facilities to the Borough, not just for us but for the next generation of Spelthorne residents.

Our consultation

This paper covers the key issues affecting Spelthorne and provides the evidence to support what we think our needs will be. Each issue then includes options for meeting that need and you are invited to express your views on those options by stating which you prefer. It may be that you do not prefer any of the options, in which case you should select the option you disagree with the least.
The easiest and most effective way to respond to the consultation is by using our online consultation portal: www.spelthorne.gov.uk/localplan
Please answer the questions at each stage and follow the instructions to submit.

Alternatively, you can email us at local.plan@spelthorne.gov.uk

Or write to us at:

Strategic Planning
Spelthorne Borough Council
Council Offices
Knowle Green
Staines-upon-Thames
TW18 1XB

What happens after the consultation?

Once the consultation closes, we will read and analyse all the responses we receive, known as ‘representations’. We will produce a schedule of representations, which we will publish on our website. Your views, along with the evidence that supports the Local Plan and the outcome of the Sustainability Appraisal will be used to help develop our new Local Plan to the next stage of Preferred Options, where we will set out what we think is the best strategy to meet our needs. We will carry out further public consultation on those options, which will include specific sites for possible allocation for certain types of development in the new Plan. We expect this to take place at the end of 2018.

By responding to this consultation and agreeing to have your contact details stored on our database, you will automatically be notified of future consultations.

For further information on the timetable for producing our Local Plan up to formal adoption, please see www.spelthorne.gov.uk/LDS
Spelthorne Facts

- Spelthorne’s main towns are Ashford, Shepperton, Staines-upon-Thames, Stanwell and Sunbury-on-Thames, with Staines being the main commercial and retail centre.

- Charlton Village, Laleham, Littleton, Upper Halliford and Stanwell Moor comprise the Borough’s villages.

- Spelthorne has a population of approximately 98,000, with this projected to increase to 116,000 by 2035\(^1\).

- The average house price in Spelthorne is £365,739 (January 2018).

- The proximity of Heathrow has a major influence on the Borough in terms of employment, housing and traffic. Approximately 8.3% of Spelthorne’s residents are employed at Heathrow Airport.

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The water industry is a major user of land in the Borough with four large reservoirs and a treatment works at Ashford.

Spelthorne is flat and low-lying with more than half the area of the Borough designated as Green Belt (65%). Because of its proximity to the River Thames, a significant area is at risk from flooding, with Staines and Shepperton being the worst affected areas.

There are four large reservoirs in Spelthorne, which comprises 24% of the Borough’s total Green Belt area. The Wraysbury, Staines and King George VI reservoirs comprise part of the South West London Waterbodies Special Protection Area (SPA).

Spelthorne has an ageing population with a small ethnic minority. A relatively high proportion of the population is ‘economically active’ (either in work or seeking work). There is a significant need for affordable housing.

The local economy supports a number of industrial estates throughout the Borough. In comparison with other Surrey districts, Spelthorne still has a relatively large amount of industrial floorspace as well as a
significant amount of warehousing, particularly for airport-related business close to Heathrow. Office development is concentrated in the main town centres.

- The M3 motorway is a major strategic transport route, which crosses through the southern part of the Borough with Junction 1 situated at Sunbury-on-Thames. The M25 runs north/south along the western periphery of the Borough with Junction 13 at Staines-upon-Thames.

You can find further information about Spelthorne’s statistics in the Authority Monitoring Report 2017 which is available at: www.spelthorne.gov.uk/AMR
Key Challenges

- Ensure we can allocate sufficient land to meet our housing need sustainably, including the provision of affordable homes and the needs of specific communities
- Maintain and intensify employment land, anticipating growth in the Borough, including additional growth from an expanded Heathrow Airport
- Plan for the necessary infrastructure, such as schools, roads and healthcare, to support our future population
- Protect our valuable open spaces, recreation and leisure facilities and biodiversity sites, including the River Thames and waterbodies
- Preserve the Green Belt where it is performing well against the purposes it was designated for
- Enhance the character of our towns and villages, including the vitality of our shopping areas
- Manage further risk of flooding and prevent or mitigate harm from environmental impacts such as poor air quality and noise pollution
- Ensure our Borough has the right amount of social, cultural and community facilities, including opportunities to support the arts
Where will all this new development go?

Ideally, we should be looking at brownfield land to accommodate our development needs. These are sites that have been developed previously, such as a redundant warehouse or underused garage block. They often have the advantage of being located in sustainable areas within or near to towns and villages. In common with other authorities especially in Surrey, we don’t have enough brownfield sites to meet our needs, especially for housing.

The National Planning Policy Framework (NPPF) defines previously developed land as:

Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure.

This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

What other land can we consider?

The Borough has other land but often it is in use for much needed sports and recreation facilities. Although we are assessing how much we have, it is unlikely we will have a surplus. Many open spaces in our urban areas also perform a valuable function to preserve the character and amenity of residential estates.

Spelthorne Council itself owns many assets in the Borough, such as buildings and land particularly within Knowle Green and in Staines town centre. Some of these sites are already included as a source of supply for housing, employment and retail uses within our Strategic Land Availability Assessment. There may be further opportunities for development growth in Staines and we are exploring the creation of a Master Plan for the town to identify what improvements can be made to the public realm to bring greater focus on its riverside location and where further development could take place.

What land is ‘off limits’?

Certain land in the Borough is subject to ‘absolute constraints’. This is where development can’t take place because it would result in unacceptable environmental impacts and the harm can’t be mitigated. These sites include functional floodplain, nationally and internationally designated sites of nature conservation and land within the noise contours of Heathrow Airport. Some sites that are subject to other designations and constraints could accommodate further development but only if sensitively designed with
appropriate mitigation, such as conservation areas, sites of a lower risk of flooding and land at risk from pollution such as noise, poor air quality and land contamination. These would need to be considered on a site-by-site basis.

**Can we say we don’t want more development?**

Our Borough is constrained by areas of flood risk, Green Belt and environmental designations but the Government still expects us to fully exhaust all options for meeting our development needs. If we don’t have a Local Plan that can demonstrate this, we risk having no plan at all. This means that the Government could write our plan for us, which would take control away from our residents and us. We would be faced with planning applications and appeals that would be difficult to defend if we felt they would not be appropriate and development would be built without us being able to anticipate growth and plan for the necessary infrastructure in a plan-led way.

**What about the Green Belt?**

Spelthorne’s Green Belt serves an important purpose in preventing the uncontrolled outward sprawl of London by keeping land permanently open and undeveloped. It also stops neighbouring towns and villages from merging into each other, which helps maintain the character and identity of areas such as Laleham, Shepperton and Sunbury. We commissioned an assessment of how all the various parcels of Green Belt land in the Borough were performing against the purposes, which concluded that at a strategic level our Green Belt is performing well. You can view the full Green Belt Assessment on our website [www.spelthorne.gov.uk/greenbeltassessment](http://www.spelthorne.gov.uk/greenbeltassessment).

The assessment did identify that some areas of Green Belt were not performing strongly or even moderately against the five main purposes or could be considered for subdivision to form sites that no longer serve a Green Belt function. The consultants who produced the Green Belt Assessment are now undertaking a Stage 2 review, which will look at smaller sites within the larger parcels identified during Stage 1 to see how they score individually against Green Belt purposes. These smaller sites have been put forward by landowners, developers and planning agents under our ‘call for sites’ exercise, where we invite anyone with land or an interest in land in the Borough to tell us if it could be available for development. Many of these sites are within the Green Belt and it is these that will be assessed at Stage 2.

Just because a site is not performing well against Green Belt purposes, it does not mean it will be developed for housing or other uses. We need to consider all the relevant issues, including what the site is used for, is it in a sustainable location with good access to public transport and services, are there other constraints that would rule out developing it, and what impact would the development have on infrastructure and nearby residents.

We can only amend the Green Belt boundary by reviewing the Local Plan or producing a new one so now is the time to consider whether this should be an option for Spelthorne. Under the National Planning Policy Framework or (NPPF), Green Belt boundaries can only be amended under ‘exceptional
circumstances. The recently published new NPPF, which is still in draft form and subject to consultation, states that all other reasonable options for meeting our identified development need should be examined first. If a new or updated Local Plan contains proposals to amend the Green Belt boundary, the inspector appointed to examine our Plan will consider whether the strategy:

a) makes as much use of suitable brownfield sites and underutilised land;

b) optimises the density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres, and other locations well served by public transport; and

c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

This consultation does not look at any specific sites in the Green Belt or anywhere else in the Borough for potential allocation for new development. We are only considering strategic options at this stage for how we might meet our development needs. Once we have assessed your views on these options, we will identify sites we think should be allocated for development and then consult you again with our preferred options.

Can our development be built in neighbouring boroughs?

We are required under the Duty to Cooperate to work closely with neighbouring authorities but the fact is they are in similar positions to us – with challenging decisions to make on where new development should go when opportunities are constrained by Green Belt and other designations. The Duty to cooperate does not mean any authority will be required to take another Borough or District’s unmet need as they may find it difficult to meet their own.

Heathrow Airport expansion

Heathrow Airport Ltd (HAL) is proposing a new third runway to increase capacity and maintain the airport’s international hub status. Spelthorne Council has supported expansion of Heathrow because of the economic benefits and opportunities it would bring to the Borough. This support is dependent on HAL making sure their scheme mitigates the impact on noise, traffic, air quality, the wider environment, infrastructure and local road networks. HAL has developed a range of options for the scheme, including land use, road realignment, river diversions and the position of the new runway, which were the subject of public consultation between January and March 2018.
HAL will consult on their preferred scheme, the more detailed proposals for the physical design of the new airport, next year once they have considered all the responses.

What does this mean for Spelthorne's new Local Plan?

From the options HAL consulted on, it is clear that an expanded airport will have a significant impact on our Borough, shifting development to the south and opening up a new gateway into Heathrow from the southeast corner. The proposals include options for using land in the villages of Stanwell and Stanwell Moor for airport related development, namely offices, warehousing, car parking and hotels. These sites are within the Green Belt and HAL will need to demonstrate "very special circumstances" to be granted planning permission to allow these sites to be built on.

The more land HAL needs for an expanded airport, the less land there is available to meet our own needs through the new Local Plan. We have put that point across to HAL in our consultation response and asked for consideration to be given to including housing within some of the land identified for possible airport related uses.

There is also the wider, strategic issue of the extra need for housing, employment, infrastructure and community facilities that an expanded airport will generate. Neither our current housing nor employment land need figures take into account additional growth in the area surrounding Heathrow. We are working with the local authorities affected by the airport to consider a Joint Spatial Planning Framework to consider these issues and how they might be addressed. This could be through improved wider infrastructure links to the airport that will allow people to travel from further afield.

We don’t yet have all the answers to what the expansion of Heathrow could mean for Spelthorne but we can’t delay the production of our new Local Plan as it will take several years for HAL to be given permission to begin construction and there are no guarantees that this will happen. We will
continue to consider the issue of Heathrow as we prepare evidence strategies and policies, working closely with HAL and the local authorities around the airport.
Housing

Housing need

Local authorities used to assess their housing needs by producing a Strategic Housing Market Assessment (SHMA), which is compiled using data on population and household growth, migration and economic factors to result in a figure for how many dwellings will be required to meet the need. Spelthorne and Runnymede Borough Councils produced a joint SMHA in 2015 that resulted in a range of between 557 and 747 dwellings per year for Spelthorne.

The Government has since published its own standardised methodology that all authorities will use, based on household growth and affordability. The figure for Spelthorne is 590 dwellings per year.

Available housing land

Spelthorne has published its Strategic Land Availability Assessment (SLAA) which is available on our website www.spelthorne.gov.uk/SLAA. The SLAA looks at how much land we have in the Borough that could be developed for housing. It does not include land that currently should not be built on, such as Green Belt, flood risk areas or sites subject to other constraints that would rule it out for development. It also only looks at developing sites at a scale and density that would fit in with existing buildings in the area. The annualised figure of how many homes can be built is 428 per year.

Gypsies and Traveller pitches

We commissioned experienced consultants to produce evidence about how many additional pitches will be needed for Gypsies and Travellers and Travelling Showpeople. The Gypsy and Traveller Accommodation Assessment (GTAA) is on our website www.spelthorne.gov.uk/GTAA. The definition of who is considered Gypsies and Travellers changed in 2015 so the numbers have to be looked at separately, which makes things a bit more complicated.
A pitch is a piece of land that generally accommodates a mobile home, a touring caravan, storage space and parking. It is normally occupied by one Gypsy and Traveller family but larger pitches may be home to an extended family. There can be one pitch on a site or several pitches.

We need to provide up to 10 pitches for those meeting the new planning definition of Gypsies and Travellers and in addition, we may need to provide 17 pitches for those who don’t meet the new definition. Even if people do not meet the new definition, we still have to assess their needs as part of the Local Plan evidence.

Travelling Showpeople are members of a group who hold fairs, circuses and shows. Over the plan period, we will need to provide between 15 and 17 new plots to meet their needs. These plots need to be suitable to accommodate their equipment as well as mobile homes.

**The challenge**

We need to find land to accommodate another 162 dwellings per year for the 15 years between when we adopt our new Local Plan in 2020 up to 2035, or 2430 dwellings in total. This is beyond the number we think we can already accommodate on brownfield land.

We also need to find land for up to 27 Gypsy and Traveller pitches and up to 17 Travelling Showpeople pitches. It is unlikely there would be enough land for this number on brownfield land.
Employment

Employment needs

We have assessed the need for new employment floor space. This is set out in the Employment Land Needs Assessment (ELNA), which is available on the evidence base page of our website [www.spelthorne.gov.uk/New-Local-Plan-Evidence](http://www.spelthorne.gov.uk/New-Local-Plan-Evidence)

We calculated the amount of floorspace needed by looking at two published forecasts for the number of people who will be employed in the Borough over the plan period and using this to work out how much floor space will be needed to accommodate them.

The ELNA only looks at the need for office, industrial and warehousing space. It doesn’t include other types of development such as shops, hospitals, schools or estate agents even though people are employed in these places.

The forecasts show we will need extra land for offices and for warehousing and storage however we won’t need as much land for industrial uses. The numbers are set out in the table below.

<table>
<thead>
<tr>
<th>Use Class</th>
<th>Change in floorspace 2017-2035 (sqm)</th>
</tr>
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<tbody>
<tr>
<td>Offices (B1)</td>
<td>15,000</td>
</tr>
<tr>
<td>Industrial (B2)</td>
<td>-21,000</td>
</tr>
<tr>
<td>Warehousing and Storage (B8)</td>
<td>14,000</td>
</tr>
<tr>
<td>Total B Class</td>
<td>8,000</td>
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</tbody>
</table>

Available employment land

Options for where new employment sites could be delivered include:

- Some of the industrial land which is no longer needed. This could be used for new warehousing and storage or for new offices. The land would need to be in the right places and suitable for such use with appropriate roads and parking
- Intensification of existing sites
- Mixed use development combining flats with offices in the town centre
- Whether we should look at any weakly performing Green Belt land to deliver sites
The challenge

- Office floorspace is being lost as buildings are converted into flats. This is done through permitted development so planning permission is not needed. Mostly older, lower quality office space has been lost.
- Protecting existing fit-for-purpose employment land from residential development. At the moment developers can make bigger profits from building homes but we need to meet the needs for jobs as well.
- Getting the right mix of flats and offices in the most sustainable locations.
- If Heathrow build a third runway they will need additional land during the construction phase and then once it is operational.
Need for other uses

Retail

The key issues to address with regard to our centres is to ensure that they remain vibrant in the face of changing shopping habits. Our current policy seeks to ensure that town centres and local centres remain the focus for retailing in the Borough. It supports the development of Staines-upon-Thames, as the main town centre, to safeguard its role as a principal centre in Surrey. Current policy also seeks to maintain the role of Ashford, Shepperton and Sunbury Cross as local centres.

There are limited development opportunities within which to deliver additional retail floor space within the local centres, therefore it will be a challenge to meet the levels of development required to ensure Staines-Upon-Thames remains competitive so as to continue to safeguard its role in Surrey.

The 2015 Retail Study identified a lack of stores selling food products, known as convenience goods, in Staines and this has only been exacerbated by the loss of Waitrose store. The Retail Study Update 2018 confirms that the closure of the Waitrose means that there is now a greater need for convenience goods stores. This represents a need to enhance the provision within Staines-Upon-Thames.

There is also the requirement to ensure the continued viability of the local centres within the Borough. This is required to maintain their role as important contributors to their local communities. In order to ensure viability, enhancements of shopping fronts and the local environment will be required in addition to extensions where appropriate.

Tourism

There are a number of attractions in Spelthorne that draw a range of visitors. Tourism remains an important part of the economy, which we need to continue to support and a key part of this will be supporting our main tourist attractions.

Tourism in the Borough is based largely around Kempton Park racecourse, the recreational use of the River Thames and the many green spaces across the Borough. The proximity of Heathrow Airport also allows the Borough to capture a proportion of travellers passing through.
Kempton Park racecourse is a significant contributor to tourism, holding regular race meetings, concerts and other events which attract a large number of visitors. As the site is set wholly within the Green Belt, careful consideration needs to be given to any improvements that balances the long term future of this key asset, its impact on infrastructure and the desire to preserve the character of the area. Therefore, in order to ensure Kempton Park remains one of the region’s key race and conference venues, we will need to give consideration as to how best to support the venue through the Local Plan.

The River Thames is a key feature of the Borough and plays an important recreation role as part of the Borough’s tourism provision. The current Core Strategy seeks to safeguard the loss of facilities associated with the recreational use of the River and seeks to support the provision of visitor facilities with access to the water where appropriate.

Open space and leisure

The Borough has a range of open spaces which are a key feature of the local environment. These range from pocket parks within residential areas to vast open spaces including the Borough’s reservoirs. National policy gives open spaces a significant level of protection and are protected from inappropriate development unless they can be re-provided in an appropriate location to the same or better standard, they are surplus or it is for an alternative leisure and recreation use.

Open space also includes burial grounds, such as cemeteries and churchyards, and allotments.

The Council has two cemeteries and two burial grounds located at the following sites comprising a total of 11 hectares:

- Ashford Burial Ground, Long Lane, Stanwell
- Stanwell Burial Ground, Town Lane, Stanwell
- Staines Cemetery, London Road, Staines
- Sunbury Cemetery, Green Way, Sunbury

There are a number of closed churchyards located across the Borough that are maintained by the Council. These churchyards are closed for any further new burials. There is therefore a requirement for the Council to assess the provision and to identify any needs that may arise.
Allotments are an important feature in the landscape of the Borough and are recognised as valuable assets. Allotments perform an important role in providing for recreation and also in breaking up the continuity of built up areas and contribute to the character of communities in the Borough. They provide a wide range of benefits to allotment holders, the community and the environment. There are 16 allotment sites in the Borough, of which 12 are under the ownership of Spelthorne Borough Council.

Leisure facilities in the Borough comprise both public and private facilities. Public facilities are provided and funded by the local authority. This allows for anyone to access the facilities. Private facilities often require membership and payment for the use of those facilities. There are two leisure centres which provide for a number of indoor sports and activities to ensure access to provision for the north and south of the Borough.

The current Core Strategy seeks to ensure that there is sufficient open space which is well sited and suitable to meet a wide range of outdoor sport, recreation and open space needs. The preparation of the Local Plan will identify the sufficiency of the current provision and will consider, where appropriate, improvements to facilities.

The NPPF sets out that the Council can establish Local Green Space for areas that are considered to be demonstrably special to the local community. These Local Green Spaces would then have the same level of protection as Green Belt. However, these can only be established through the preparation of a Local Plan and we will look to designate such spaces where appropriate.
Infrastructure

It will be no good building the houses, offices, commercial and retail premises we need if the infrastructure is not in place to support the growth and the needs of new and existing residents. Local infrastructure provision is therefore a key element of the spatial planning approach to ensure that current and future demands are met.

Local planning authorities are required to set out within their plans the infrastructure that is needed to support the level of development being proposed. The infrastructure planning process needs to identify not only the infrastructure that is required but also the cost and phasing of delivery, how it will be funded and who is responsible for delivery.

Spelthorne will need to work with other authorities and service providers to assess the quality and capacity of all our infrastructure. Where necessary we will also need to take account of the need for strategic infrastructure including nationally significant infrastructure such as that associated with the expansion of Heathrow.

Types of infrastructure and delivery agencies

The following are the types of essential community infrastructure required to support the growth in population in Spelthorne by 2035:

- Education (including early education, primary and secondary schools, further education)
- Health (including local health and clinics)
- Highways and transport
- Leisure (sports facilities defined as publicly owned leisure centres, gyms and swimming pools)
- Library services
- Green infrastructure (networks of multi-functional natural green space that support biodiversity, health and wellbeing)
- Community facilities (community centres and meeting places)
- Emergency services (fire/police/ambulance)
- Waste management and disposal facilities
- Electricity and gas
- Water and sewerage

The County Council, working with the Borough Council, is responsible for providing some of these types of infrastructure, notably education and highways. The funding of infrastructure is primarily the responsibility of the service provider, however the use of developer contributions and Community Infrastructure Levy receipts will be essential in helping to ensure that the necessary infrastructure is provided in the right place and at the right time.
In assessing the existing and future needs the Council will, wherever possible, use local and national targets to understand whether there is, or will be, a deficit of provision. In some circumstances there are agreed national standards set by Government against which to assess provision. For example, the requirement for school class sizes determines how many extra classes are needed to support a growth in population. For other services local standards will be agreed that reflect the nature of the service and population it serves. In addition to the standards set, the Council will use forward planning documents produced by service providers to establish the potential impact of the expected level of population growth. This process will help us determine whether there is a need for new infrastructure, the additional amount required and the potential cost of delivery.
Strategic Options

Option 1

Aim to meet all our need for housing, including affordable housing and Gypsy and Traveller pitches, employment and other development in the urban area without amending Green Belt boundaries by:

- Significantly increasing densities of all potential housing sites, particularly those in town centres and near public transport facilities, including well designed high rise development
- Prioritise meeting housing need and relax policies that protect employment sites to allow more conversions and redevelopment for housing schemes
- Build on open space and re-provide sports and recreation facilities in the Green Belt

Advantages:

- Focuses development within the urban area
- Maintains and enhances the vitality of town and village centres
- Supports access to the Green Belt for recreation purposes
- Could meet housing need in full

Disadvantages:

- May not meet employment need if housing prioritised over other forms of development
- Loss of employment land could result in Spelthorne becoming a ‘dormitory borough’, where people live but work elsewhere
- Whilst some locations such as Staines and Sunbury Cross already have high rise development, other locations would have their character damaged by high density development
- Developments would mainly comprise flats without gardens and less opportunity for parking
• Loss of open space within the urban area would adversely impact on quality of life for residents
• Difficulty in securing new facilities and improvements to infrastructure and community facilities such as schools, healthcare and highways
• Increase in pollution such as noise and poor air quality arising from additional congestion on the roads
Option 2

- Amending the Green Belt boundary significantly to meet our housing and employment need
- Safeguarding land in the Green Belt for future need beyond the plan period
- Retaining Green Belt designation only for sites that are strongly performing and/or perform a strategic Green Belt function

Advantages:

- Meets housing need in full and also potential to meet neighbouring authorities’ housing shortfalls
- Could meet need beyond the plan period
- Preserves the character of towns and villages in the urban area, including open spaces
- Allows for land to be built on for new schools, healthcare facilities and community uses
- A greater mix of house types could be built, including family homes with larger gardens and parking spaces

Disadvantages:

- Results in significant loss of Green Belt land, including ‘moderately performing’ land that still serves an important function
- Loss of biodiversity habitats
- Less incentive to develop brownfield sites in the urban area
- Locations for new development potentially less sustainable and more pressure to deliver new infrastructure
Option 3

Focus new development opportunities in Staines-upon-Thames by:

- Making use of a Master Plan approach for development that increases opportunities for new high rise residential buildings
- Significantly increasing densities in the Staines area, not just within the central core, where easily accessible to the town
- Prioritising housing need by allowing employment sites such as offices to be converted or redeveloped for housing
- Allocate sites for housing elsewhere in the Borough but only at a density similar to surrounding development

Advantages:

- Preserves the status of Staines as the Borough’s largest town and increases the vitality of its shopping areas
- Exploits growth opportunities arising from the nearby Heathrow Airport, especially once expanded
- Less need for development in other areas of the Borough, including the Green Belt
- Protection for open spaces and sites with nature conservation importance

Disadvantages:

- Unlikely that full housing need could be met just in Staines, even with identified brownfield sites elsewhere in Spelthorne
- Difficult to build the level of infrastructure, particularly the highway network, required to support this level of development in one town
- Lack of space for new schools, healthcare facilities and community uses
• Reduction in employment sites would make Staines more of a dormitory town and fail to take advantage of the employment, retail and tourism opportunities Staines offers
• Lack of space for new Gypsy and Traveller pitches
Option 4

A combination of the other three options by:

- Increasing densities in town centres and near transport facilities and other areas where the character can accommodate it and allowing high rise development in areas where there are existing tall buildings and they are of a high quality design.

- Releasing some weakly performing Green Belt land for development where its release would not adversely affect the integrity of the strategic Green Belt.

- Making use of a Master Plan approach for Staines but with housing as one of a range of uses that can be accommodated within the town and not favouring residential development over employment, retail and tourism uses.

Advantages:

- Spreads new development across the Borough without one area being significantly greater affected than others.
- Maintains the focus on making best use of brownfield sites and public sector land.
- Fewer employment sites lost.
- Exploits regeneration opportunities for Staines, with housing provided but together with other uses that can vitalise and support the town’s economy.
- Less damaging to the character of towns and villages that have fewer existing areas of high density development.
- Allows sufficient land to accommodate infrastructure and facilities.
- Preserves strongly and moderately performing Green Belt land.
Disadvantages:

- May not meet housing needs in full and relies on further work to identify smaller sites within the larger land parcels identified in the Green Belt Assessment that may be performing weakly.
- Less opportunity to meet housing need shortfalls of neighbouring authorities.
- Harder to plan for infrastructure across a range of smaller sites throughout the Borough.
Issues and options questions

The easiest and most effective way to respond to the consultation is by using our online consultation portal [www.spelthorne.gov.uk/localplan](http://www.spelthorne.gov.uk/localplan) However you can also email us at [local.plan@spelthorne.gov.uk](mailto:local.plan@spelthorne.gov.uk) or write to us at: Strategic Planning, Spelthorne Borough Council, Council Offices, Knowle Green, Staines-upon-Thames, TW18 1XB

**Question 1**

To what extent do you agree or disagree with the four options?

<table>
<thead>
<tr>
<th></th>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>Option 1 - Brownfield Focus</td>
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<td>Option 2 - Green Belt Focus</td>
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<tr>
<td>Option 3 - Staines Focus</td>
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<td>Option 4 - Combination</td>
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</table>

**Question 2**

Please choose your preferred option to take forward in the new Local Plan for Spelthorne. If you do not prefer any of these options, you may use this question to tell us the option you dislike least.

- Option 1 – Brownfield Focus
- Option 2 – Green Belt Focus
- Option 3 – Staines Focus
- Option 4 – Combination
- None of the above - please expand on your answer with additional information

**Question 3**

If you have a suggestion for an alternative option for meeting Spelthorne's needs, please let us know and provide further detail.
Local designations

The preparation of a new Local Plan offers the opportunity to review all of Spelthorne’s planning designations to ensure they are still fit for purpose and performing well against the reasons for the designation or if changes should be made to their boundaries. Earlier in this paper we discussed the review of the Green Belt and there are other sites in the Borough that are designated nationally or even internationally and these will not be reviewed.

The designations that we think should be reviewed are:

- Protected Urban Open Space
- Plotland Areas
- Sites of Nature Conservation Importance

Protected Urban Open Space (PUOS)

The Core Strategy 2009 contains a list of specific sites that fall within the designation of Protected Urban Open Space [link]. These are areas that contribute to the character and amenity of towns and villages in the Borough, such as parks, recreation grounds, school playing fields and residential estates that include pockets of open space.

Since the Core Strategy was adopted, the National Planning Policy Framework (NPPF) was published, which includes policy on open spaces. It provides protection for open space, whether formally designated or not, and will only permit its loss if certain criteria are met, similar to the existing policy.

The NPPF also allows for certain sites to be designated through the Local Plan process as Local Green Space. This provides an additional level of protection similar to land within the Green Belt. We can also draft new design policies to avoid the loss of smaller pockets of open space that make an important contribution to the character of residential areas and estates. The Council has lost planning appeals for PUOS sites and the production of a new Local Plan is an opportunity to review whether this designation still achieves its purpose.

Question 4

Do you agree that the Public Urban Open Space designation can be removed and we should consider sites for designation as Local Green Space instead?

- Yes
- No
- Don’t know
Please let us have any additional comments.

**Question 5**

Do you have any sites you would like us to consider allocating in the new Local Plan as Local Green Space? Please supply address details and why you think the space should be designated.

**Plotland Areas**

Plotland Areas are located mainly along the River Thames or on the river’s islands that originated as weekend or holiday bungalows in the 1920s and 1930s but are now occupied as permanent residences. Their distinctive character contributes to the wider character of the riverside and it is important that their scale is carefully controlled.

However, they are also located within the Green Belt where there are already controls over the size of extensions and replacement dwellings. The current policy [link] requires new development to comply with Green Belt policy in addition to further requirements for Plotland dwellings. Other neighbouring local authorities also have the Plotland designation, or have had it in the past, but the policies vary from borough to borough so there is little consistency in how these areas are treated.

We would like to consider whether the Plotland Area designation is still achieving its purpose, whether it is consistent with other boroughs, whether it is fair that those wishing to extend or replace their homes have additional controls to the Green Belt policy and whether design and character policies could achieve a similar function.

**Question 6**

Do you agree that we should remove the Plotland Areas designation in the new Local Plan and use design policies instead to preserve their character?

- Yes
- No
- Don’t know

Please let us have any additional comments.
Sites of Nature Conservation Importance

There is a requirement of national policy for the Council to set out a strategic approach for the creation, protection and enhancement of areas of Green Infrastructure in the Borough.

The Borough has a number of Sites of Nature Conservation Importance (SNCI), which is a local designation. This designation is attributed to sites where it is considered they have substantive local nature value concerning their flora and fauna. The Council is able to review and alter boundaries for SNCIs where it is considered appropriate following detailed surveys of the sites. This review will take place as part of the development of the new Local Plan and each site will be thoroughly assessed to identify any areas that are considered suitable to be added or lost from the designation.

In addition, the Borough’s reservoirs are designated under the South West London Waterbodies Special Protection Area (SPA) and as Ramsar sites in 2000. SPA and Ramsar are international designations and afford the highest level of protection.

Also, the Borough has a number of Sites of Special Scientific Interest (SSSI) including Shortwood Common and Poyle Meadows. SSSI is a national designation, these sites are considered to have national importance for nature conservation and strict protections are applied.

The Council will continue to seek to protect biodiversity through safeguarding these designated sites and, where appropriate, seek to secure enhancements.

Question 7

Please provide any comments you wish to make on the review of Spelthorne’s Sites of Nature Conservation Importance.
Question 8

Are there any other local designations you think we should review, amend or delete as part of the new Spelthorne Local Plan? If yes, please let us know the details.

- Yes
- No
- Don’t know

Please let us have any additional comments.

Question 9

Do you have any further comments you wish to make regarding Spelthorne’s new Local Plan?

Question 10

If you have a separate document in support of your response, you can upload it using the consultation portal found at www.spelthorne.gov.uk/localplan or you can email it to the team or post it to us. The details are below.

Have your say

The easiest and most effective way to respond to the consultation is by using our online consultation portal: www.spelthorne.gov.uk/localplan

Please answer the questions at each stage and follow the instructions to submit.

Alternatively, you can email us at local.plan@spelthorne.gov.uk

Or write to us at:

Strategic Planning
Spelthorne Borough Council
Council Offices
Knowle Green
Staines-upon-Thames
TW18 1XB

Consultation runs for 6 weeks and closes at midnight on Monday 25 June 2018.
Thank you for participating in our consultation.

Once the consultation closes, we will read and analyse all the responses we receive, known as ‘representations’. We will produce a schedule of representations, which we will publish on our website. Your views will be used to help develop our new Local Plan to the next stage of Preferred Options, where we will set out what we think is the best strategy to meet our needs.

We will carry out further public consultation on those options, which will include specific sites for possible allocation for certain types of development in the new Plan. We expect this to take place at the end of 2018. By responding to this consultation and agreeing to have your contact details stored on our database, you will automatically be notified of future consultations.