

Spelthorne Local Plan – Issues and Options Consultation Response Document



Spelthorne Takes Shape

September 2018



1. Introduction

- 1.1 The purpose of this document is to set out the responses to the Issues and Options consultation undertaken by Spelthorne Borough Council as part of its preparation of a new Local Plan.
- 1.2 The 6 week consultation took place between 14 May and 25 June 2018 and was in the form of a questionnaire which set out the key issues affecting Spelthorne and the options to be considered.
- 1.3 The responses to this consultation will be used to assist in preparing its Preferred Options for the new plan.

2. Strategic Options

- 2.1 Four options were proposed and the paper outlined the advantages and disadvantages for each option. The options are summarised below:

Option 1: Brownfield Focus

Aim to meet all our housing need – including affordable housing and Gypsy and Traveller pitches – employment and other development in the urban area without amending the Green Belt boundaries by significantly increasing densities particularly in town centres and near public transport facilities; relaxing policies that protect employment sites; building on open space and re-providing recreation facilities in the Green Belt.

Option 2: Green Belt Focus

Amend the Green Belt boundary to meet our housing and employment need; safeguard land in the Green Belt for future need beyond the plan period; retain the designation only for strongly performing sites and those that perform a strategic Green Belt function.

Option 3: Staines Focus

Focus new development opportunities in Staines-upon-Thames by making use of a Master Plan that increases opportunities for new high rise residential buildings; significantly increase densities in the Staines area; prioritise housing need by allowing employment sites to be converted to housing; allocate sites for housing elsewhere in the borough but only at a similar density to surrounding development.

Option 4: Combination

A combination of the above three options by increasing densities in town centres; releasing some weakly performing Green Belt land; making use of a Master Plan for Staines but with housing as one of a range of uses.

3. How we engaged with people

- 3.1 We engaged with people prior to and during the consultation period in the following ways:
 - Web-based consultation information
 - Presentation to Local and County Councillors
 - Presentation to local Residents Associations

- 499 emails and 225 letters sent out to Stakeholders on our consultation database
- 2 x public presentations at the Council Offices
- Distributing leaflets at 4 main stations during the morning peak time – Staines, Ashford, Sunbury and Shepperton
- Distributing leaflets and engaging with the public at various locations including:
 - Tesco Ashford
 - Tesco Sunbury
 - Staines Town Centre
 - Ashford High Street
 - Clare Road, Stanwell
 - The Avenue, Sunbury
 - Notcutts, Laleham
 - Shepperton Village Fair
- Presenting at public meetings – Ashford North RA AGM, LoSRA AGM, Shepperton AGM and Spelthorne Business Forum
- Posters on the borough noticeboards
- Articles in various newsletters, e.g. Spelthorne enews, local schools, Spelthorne Business Forum and Residents Associations. Leaflets were distributed by some Residents Associations
- Local newspaper articles in the Surrey Advertiser and the Chronicle and Informer
- Pre-consultation article in the Borough Bulletin
- Leaflets available at the Council Offices reception
- Consultation information available in the borough's five libraries
- Footer on external emails promoting the consultation
- Link from front page of the Council's website

3.2 In total we received 247 representations. Approximately 40 similar responses were received from residents in the Lower Sunbury area. As this represents 16% of the responses received we have included comments in the analysis below.

4. Summary of Key Issues

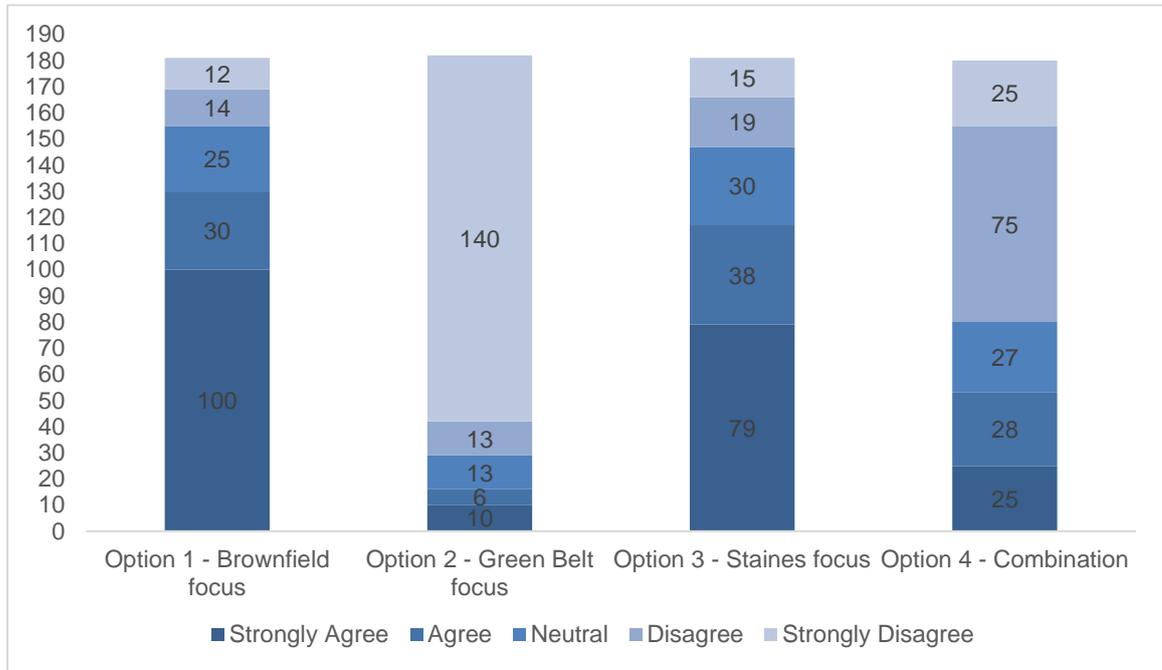
4.1 A large number of individual comments were made in response to the questions posed and these are all set out in detail in Section 5. However, the key issues which have been raised a number of times are summarised below:

- Many comments disagreed with the notion of considering further high rise development but many also felt that we should be increasing densities
- Need for more affordable housing, starter homes and smaller units for the younger generation in the borough
- Concern over loss of Green Belt and any other open space, however, many comments suggested housing need should warrant losing some Green Belt
- Significant levels of objection to development of Kempton Park
- Concern over the impact on infrastructure, especially health services, school places and local roads. New infrastructure, including public transport improvements, to support growth should be in place before development commences
- Spelthorne should use compulsory purchase powers to secure more brownfield sites, including vacant buildings, for housing development
- Need more sports, leisure and recreation facilities as well as community and cultural uses
- Lack of parking for existing residents and concern that additional residents will exacerbate the situation, especially in town centres
- Staines-upon-Thames must be supported as a vibrant, thriving, mixed use town centre with more independent retailers and needs to respond to the changes in shopping habits
- New plan should take account of significant flood risk, environmental issues such as air quality and the need to support and retain local biodiversity
- Need to retain control of our Local Plan, developed with the community, and not taken out of our hands by Central Government

5. Response to questionnaire

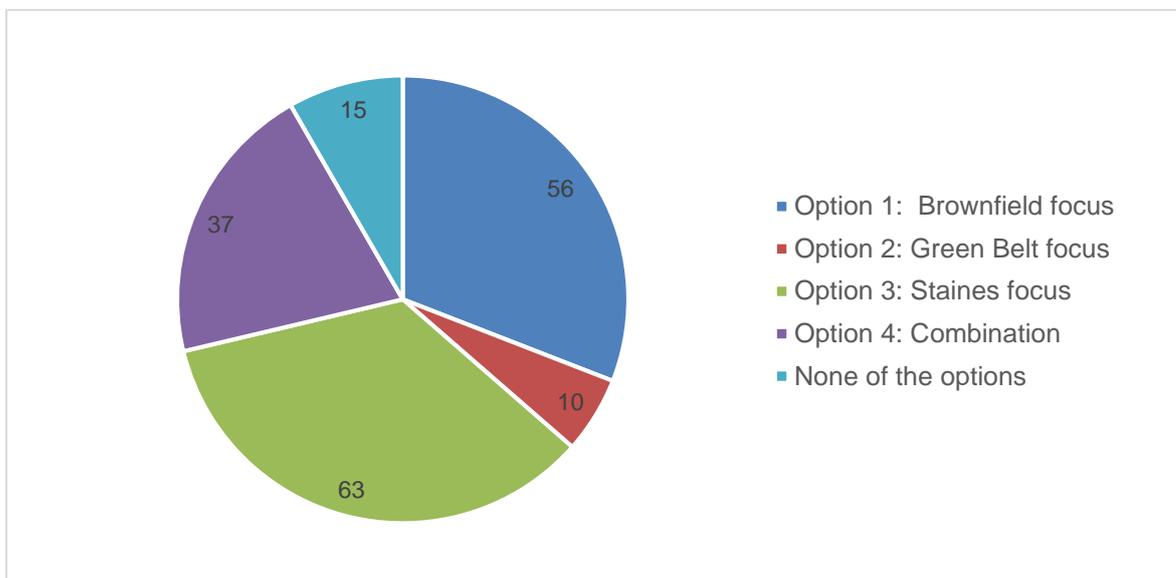
Question 1: To what extent do you agree or disagree with the four options?

5.1 181 participants responded to this question with the majority opting for Option 1 – Brownfield Focus.



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.

5.2 Again 181 participants answered this question. The following chart shows their preferred option. Fifteen didn't choose any of the 4 options and their comments are summarised below.



5.3 Four organisations did not express a preference and their comments are summarised below:

Organisation	Comment
Sport England	No comment.
Theatres Trust	These matters are outside of the Trust's remit, therefore we make no opinion or preference.
Natural England	No strong preference. We encourage you to undertake a Flood Risk Sequential Test and allocate sites with the lowest risk of flooding. This could be areas in the Green Belt.
Colne Valley Park Community Interest Co	The Colne Valley Park does not have a preferred option, as its remit is focused on the landscape. Much of the housing and other issues relating to the local plan are outside of this remit. We have serious concerns with proposals that impact on the green belt, and in particular the ability of the Colne Valley Regional Park to provide accessible and multi-functional green space for local communities (who benefit from the health, wellbeing and educational opportunities that access to green space brings); wildlife; the rural economy and recreational users (angling, walking, bird watching etc). For this reason we strongly object to Option 2: Green Belt Focus, and have concerns about option 4.

5.4 Nine individuals did not express a preference. Their comments, along with the additional comments made by those who did chose an option are set out below. All raised similar issues with particular concern about the provision of infrastructure to support new development, the Green Belt and the need to retain open spaces.

Comments	Number of times mentioned by those not choosing an option	Number of times mentioned overall
Ranked four options/Preferred a combination of options	2	2
Infrastructure	4	12
Green Belt	2	10
Retain open spaces/improve the quality of existing green spaces	3	6
Housing targets unrealistic/Concern about increase in population/number of additional homes	4	5
Congestion	3	3
Public transport limited except in Staines		2
Air pollution	1	2
Support for masterplan for Staines		2

Comments	Number of times mentioned by those not choosing an option	Number of times mentioned overall
Importance of nature corridors		2
Support for development in Staines	1	2
Heathrow expansion	3	3
Support for light rail		1
Development for business should take place across Spelthorne.		1
Concern about character if density increases		1
Redevelop unused office buildings	3	1
Criticism of recent architecture in Staines	1	1
Concerned "maintaining status" of Staines may not be achievable		1
Kempton - protect		1
Pressing and significant need for affordable housing		1
Circumstances justify the release of green belt/Support release of Green belt		1
Former minerals working are potential source of housing land		1
Kempton Park (if sold) should absolutely be developed due to the existing road links and close proximity to the train station, with potential connectivity to Crossrail 2 at stations further down the line.		1
Space standards/size of new homes	1	1
Need for affordable housing	1	1
Comment on wording of the question		1

Question 3: If you have a suggestion for an alternative option for meeting Spelthorne's needs, please respond below and provide further details.

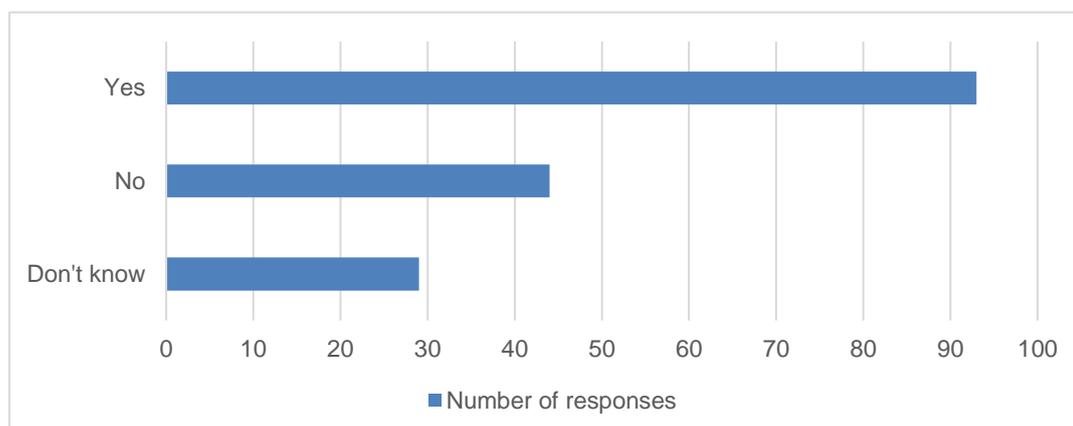
5.5 This question was answered by 49 participants. The alternative options suggested were as follows:

- Local Designations review (Protected Urban Open Space, Plotland Areas & Sites of Nature Conservation Importance)
- Compulsory Purchase sites to free up more sites
- Change of Use from B1 (commercial) to C3 (residential)
- Redevelopment of excess retail spaces
- Utilise empty homes
- Redevelop all existing empty, old and disused buildings
- No provision for additional car-borne shopping as it takes up more land and displaces existing facilities
- A better and relaxed system of local planning

- Redevelop Colne Valley Park in line with a potentially new policy
- Housing should not always be the top priority
- Promote greater density housing
- Enforce Duty to Cooperate better
- Developers should maximise plots within appropriate timescales
- Investigate the prospect of purchasing land from the various water utility companies or consider entering into a joint venture/partnership in developing land e.g. King George/Wraysbury and similar sites
- Consider additional housing development on large garden areas
- Redevelopment of Brownfield land within the Green Belt in meeting housing needs
- Release of sustainable sites which contribute little to Green Belt purposes for residential development
- Relocate Two Rivers car park, build a park & ride elsewhere and use that space for housing
- Consider customer behaviour changes over the next 15 years or so
- Develop more sports and leisure facilities
- Develop mixed, "post chain store", small-business/independent shop/café town centre with more space given to housing
- Consider other plots within/on the boundary to the north separating Hounslow (Feltham) and Ashford to support Staines expansion if necessary
- Promote affordable developments with parking
- Provide infrastructure first before providing more housing
- Stanwell Regeneration is a good model

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?

5.6 167 participants responded to this question with 56% agreeing that the designation could be removed. There were a number of comments regarding Protected Urban Open Space (PUOS), particularly from Lower Sunbury residents who felt that the designation had not protected sites such as London Irish and the tennis courts at The Ridings.



- 5.7 Sport England noted that within the PUOS designation a number of sports grounds and playing fields were included. They recommend that specific reference should be made to the protection of sports facilities and playing field land unless exceptional circumstances apply in accordance with paragraph 73 on the National Planning Policy Framework (NPPF) and Sport England's playing fields policy.
- 5.8 Surrey Police commented that 'public spaces should be designed for the benefit of all members of the community and should be 'healthy, inclusive and safe places' which promote social interaction, are safe and accessible and support healthy lifestyles. Being subject to crime impacts on the health and well-being of residents and the local economy. Design can also impact on perceptions of the threat of crime ('fear of crime')'.
- 5.9 Further comments include:
- PUOS are important for community recreational purposes, sporting facilities, etc.
 - Doesn't understand the implications
 - LGS should be extended to:
 - all current PUOS sites
 - all current PUOS sites in Lower Sunbury
 - all current PUOS sites in Lower Sunbury, Upper Halliford and Shepperton
 - Answer based on understanding that Local Green Space affords a higher level of protection than PUOS
 - Designations have failed to protect local areas from developers
 - LGS feels ambiguous. PUOS designation distinguishes between any types of open space in the rural-urban fringe and vital spaces in towns used by people in high density housing
 - Need to preserve our environment and ecosystems
 - Doesn't understand whether Council has lost appeals for creating PUOS sites or to develop on PUOS
 - Do not need to lose any open/green space. The large water industry area could be used for recreational purposes
 - There are areas of open land that are despoiled and whilst open should not be designated LGS. Given the additional layer of protection to land within the Green Belt this would not be appropriate given the need to release areas of Green Belt for housing to meet a real and important need. These new housing areas can provide for areas of well landscaped open space within them
 - PUOS should be ring-fenced as not negotiable for development. Comments on building, parking and building regulations
 - PUOS designation too prescriptive. Appeals allowed because space was not 'open'. LGS designation should overcome this
 - When determining a methodology to assess sites consider those already developed by neighbouring authorities, e.g. Elmbridge and Runnymede
 - PUOS should become LGS or even GB. PUOS disappearing in the proposals for the new Leisure Centre

- Can find no info on status of PUOS (Spelthorne only designation). Happy if LGS offers more protection
- Couldn't find definition in FAQs. Green space must be key in urban planning. How does LGS include other open areas such as the high street and riverside?
- Couldn't find any plans/maps. Not user-friendly
- Provision of amenities need to increase if population density is increased
- Sounds like spin to make it easier to build on later
- Indifferent to designations. Would Splash Meadow & Nutty Wood in Shepperton get this recognition?
- If this is a means of circumventing protections more easily in order to develop open space people would be opposed to this
- E12 Flower Pot Green
- All things should be kept simple

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.

5.10 This question was answered by 94 participants with a number of sites being suggested. Again for this question there were a large number of responses from Lower Sunbury residents putting forward sites in their area.

5.11 The table below lists the sites put forward by more than one respondent.¹

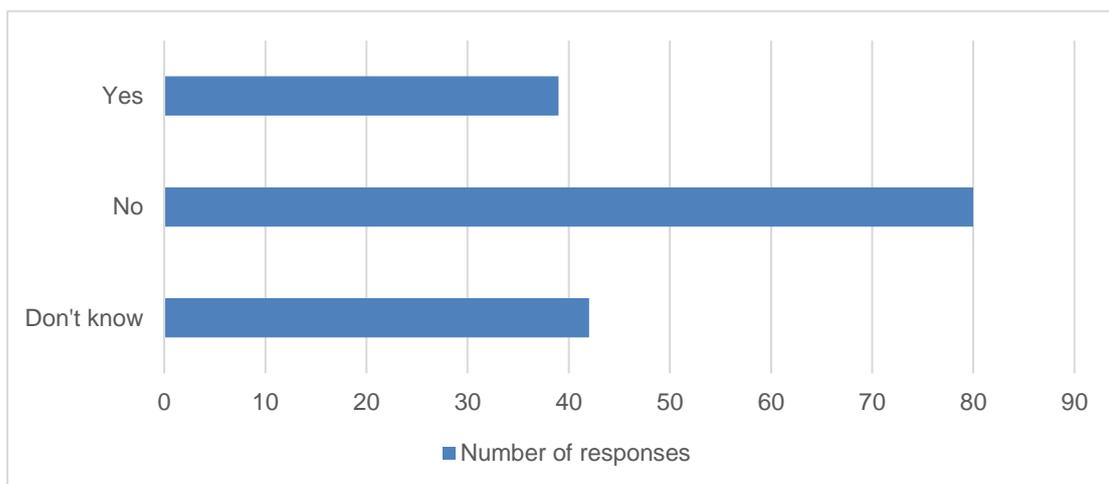
Sites	Number of times suggested
A3 - Cedars Recreation Ground, Sunbury	53
E12 - Flower Pot Green, Sunbury	49
A16 - The Linear Park, Sunbury	47
C12 - Land to the north of Springfield Primary School, Sunbury	47
E21 - Skate Board Park, Sunbury	46
C7 Land to the north of Sunbury Manor School, Sunbury	46
B2 and D4 - Area north of Batavia Rd, Sunbury including the sports ground	45
B3 and C9 and what remains of PUOS surrounding St Paul's School, Sunbury	44
E11 - Land behind Sunbury Court Conference Centre, Sunbury	44
D14 - Semicircle of grass south of Elm Drive, Sunbury	43
Area 48 - Old Bathing Station, Fordbridge Road, Sunbury	4
Sunbury Park, Sunbury	3
Land either side of Halliford Road, Shepperton (Vicarage Farm)	3

¹ There were a number of other sites suggested once and a full list of these are available on request.

Sites	Number of times suggested
Upper Halliford Park, Shepperton	3
Hawke Park, Sunbury	2
Village Green, Lower Sunbury	2
Bishop Duppas Park, Shepperton	2

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?

5.12 161 participants answered this question. Although 50% disagreed with the designation being removed, 26% were undecided.



5.13 There were a number of comments regarding the Plotland Areas which are listed below:

Comments	Number of times commented
The Plotland Areas south of Lower Hampton Road opposite Sunbury Cricket Club, on Sunbury Court Island, on Willow Way, The Creek, east of The Sunbury Holiday Inn and on Riverside near Walton Bridge are distinctive to Lower Sunbury and special to the River Thames more widely. Their character would be far better protected through continuing to be designated as Plotlands.	33
Unsure what these areas are. More information would have been helpful.	7
Plotlands are a vital and distinct part of the local character that attracts tourists and businesses to the area.	3
Plotland designation is somewhat dated and maybe redundant. However, character needs to be safeguarded.	2
Existing Plotland areas should be preserved to protect their character.	2
Why change if the current system is working?	2

Comments	Number of times commented
Design policies would be too open to subjective interpretation. Do not want blocks of flats along the riverside like in Kingston.	1
Design policies should be drawn up before deciding.	1
Not be trusted as in the past 'design policies' seem to change on a whim.	1
These sites are housing rather than Green Belt for all practical purposes and should be considered as such.	1
Agree provided new Local Plan policies do not allow for the Plotland area dwellings to get out of control. Dwellings do add character to the area.	1
Is the Plotland Area designation still achieving its purpose and is it consistent with other boroughs?	1
Agree provided that the relevant Green Belt constraints are applied and enforced.	1
Generally removing designations means controls are more lax.	1
Keep it simple and consistent.	1
If Plotland relates to use of riverside then the same planning rules should be used to avoid encroachment by buildings and permanently moored vessels.	1
Do not allow unchecked urbanisation on the banks of the Thames. Would lead to an increase in flooding.	1
Indifferent to designations.	1
When considering Plotland Areas flood risk should be considered as well as biodiversity and river restoration.	1
No objection to SBC building new apartments etc on this land. If existing properties want to extend or replace they should apply for planning permission.	1
Rules for Plotland building need to be transparent and not subject to interpretation by a building inspector.	1
The Lower Hampton Riverside area has become a rather unattractively jumbled area both in scale and character design. Fencing should be prohibited from a height which excludes the public view from what would otherwise be enjoyment of the Thames riverscape.	1
There are also strong reasons why such areas require detailed consideration such as Flooding, Interference of River flow, and Parking which increases the hazard on the main road, and damage to verges and blocking of adjacent roads.	1
Design Policies should extend to protect the appearance of all the islands.	1

Question 7: Please provide any comments you wish to make on the review of Spelthorne's Sites of Nature Conservation Importance.

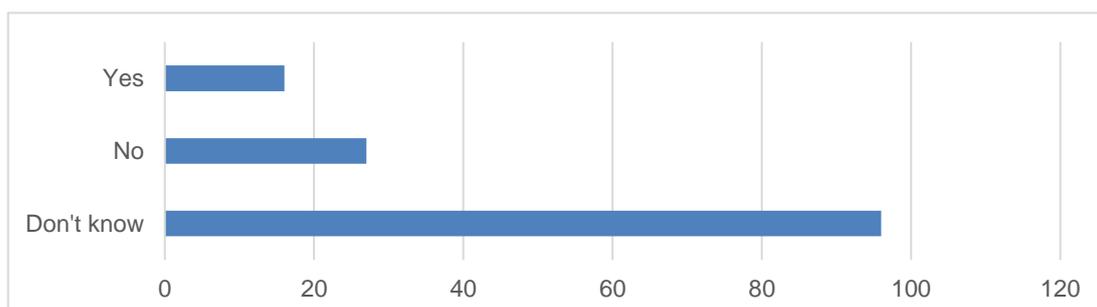
5.14 This questions was answered by 99 participants and a summary of their responses are as follows:

Comments	Number of times commented
Staines Moor is our largest and most significant Site of Scientific Importance. Dumsey Meadow, also an SSSI, is the last unspoiled grassland meadow by the Thames between London and Staines. The significance of linear corridors connecting sites of biological interest – SSSIs and SNCIs – cannot be overstated. Most of our significant areas are linked by rivers, farm land, brownfield sites, roadside verges and hedgerows. The threats to these areas is considerable. More specifically, the Kempton Park estate contains two SNCIs and borders a reservoir which is designated as an SSSI. All these three Kempton Park areas are vital refuges for flora and fauna.	38
All SNCI's should be protected - with better access.	16
Agree the Council should continue to protect and enhance the SNCIs and SSSI designated areas.	9
Kempton Park contains two SNCIs and borders an SSSI and should be protected.	6
Staines Moor should be given a high protection.	5
It is important that we maintain wild life corridors throughout the Borough.	4
Council need to undertake a full ecological survey of all designated sites and give due 'weighting' to each site. Also need to consider the implications of the recent 'People over Wind' European Court case in relation to the SPA areas.	2
Areas near the River Thames deserves conservation, such as the river meadows and aits / islands.	2
If any designated site is at risk of being lost the Council should highlight the risk and consult with residents.	2
Ash Link Local Nature Reserve should be protected and extended if possible as must Kempton Park Lakes.	2
Maintain and improve low quality areas.	2
Over-development and increased pollution has led to decrease in wildlife habitat - particularly air-borne pollution - Eco park in Shepperton and Heathrow expansion.	2
Unsure why we have our own category/policy.	2
More needs to be done to enhance existing areas.	2
Trees in all areas but particularly those of Nature Conservation should be stripped of invasive elements, such as Ivy as part of Council Policy.	1
Moor Lane Nature Reserve, Moor Lane, Staines - needs to be better maintained.	1
Sites of nature conservation should be excluded from development.	1
Fencing and planting should be considered to mitigate against noise and pollution.	1

Comments	Number of times commented
The Colne Valley Park would welcome a thorough survey to inform review of Sites of Nature Conservation Importance (SNCI).	1
There should be a specific policy to ensure enhancements to designated sites, buffer zones and connecting habitats can be secured through planning gain. As well as one-off improvements, this should also include resources allocated for continuing management and maintenance.	1
The braided channel of the Colne including the River Colne, Wraysbury River, Bonehead Ditch, River Ash and Sweeps Ditch is a significant asset within Spelthorne that connects many of these designated sites acting as an important habitat corridor. A policy should be included in the local plan that protects and enhances the importance of river corridors for biodiversity and the landscape. Alternatively, the council could adopt the forthcoming Colne Valley Spatial Vision (a Green and Blue Infrastructure Plan) as Supplementary Planning Guidance through an appropriate policy hook within the Local Plan.	1
Due consideration should be given to whether the impact on the environment and nature conservation would limit other areas where the impact felt would be greater on local communities.	1
Encourage the protection and enhancement of the natural environment through blue and green infrastructure, buffer zones and designated sites.	1
Support and promote policies set out in the National Planning Policy Framework (NPPF), which contribute towards conserving and enhancing the natural environment.	1
Support the Government's 25 year Environment Plan which seeks to achieve an environmental net gain principle for development, including housing and infrastructure.	1

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.

5.15 139 participants answered this question. 69% didn't know if there were any other designations we should review as part of the new Local Plan. Just 12% or 16 respondents thought there were other designations that should be reviewed.



5.16 Many of the suggestions put forward were more general comments, rather than related to specific Local Plan designations.

Comments	How many times raised
Staines Market Square should be protected.	2
Need more focus on Art and Culture in Staines. Town Hall could be used as a theatre/arts centre.	2
Halliford Park should not be included in this proposal. Playing fields should be protected.	2
Need for additional infrastructure and better roads	2
All green areas along the river used for communal use e.g. Sunbury Regatta	1
Large field attached to Lord Knivett School could be expanded for educational requirements. Ideal place for extra medical facilities.	1
Long term vacant properties should be reviewed with the purpose to provide better development of the site.	1
The availability of open spaces and parks should not be reduced - negative impact on children.	1
Suggests changes to Plotlands Policy RU8 (b, d and e)	1
Kempton Park should not be developed in any form	1
Kempton Park/Running Horse sites should not be developed. Sunbury Cross unable to cope with additional traffic. Air quality issues.	1
All space that meets the criteria should be made Local Green Space and then the line held when planning pressure is placed upon it	1
Selective parts of the Green Belt should be released for housing	1
Existing town centre boundaries and frontages should be reviewed to ensure they are relevant and up-to-date	1
Impact of conservation areas on the ability to develop should be considered	1
All protected areas should be left as they are	1
The River Thames Scheme is an important flood defence scheme which aims to reduce flooding to communities and critical infrastructure such as the M25, rail links and electricity and water suppliers. Safeguarding land policies can help ensure the successful implementation of the scheme.	1
Shortwood Common should be preserved	1
Need more leisure space - could areas of green belt in the area be designated as country parks - safe from the threat of development, and available for leisure use by the community ?	1
Runnymede BC should develop Laleham golf club into housing.	1
Impact of a conservation area and how this impacts the ability to develop.	1

Question 9: Do you have any further comments you wish to make regarding Spelthorne's new Local Plan?

5.17 We received 140 comments to this question, and a number of participants attached separate documents in support of their response (Question 10). Several developers were promoting sites for potential development, some of which had already been received during our 'Call for Sites'.

Comments	How many times raised
Insufficient infrastructure (including roads, public transport, healthcare, schools etc) to cope with development and better funding needed.	32
Green Belt should be preserved for the well-being of the borough, taking account that much of our Green Belt is water/General Green Belt comments.	24
Concerns over impact of Heathrow expansion.	14
Additional development, including increase in population, will harm the borough's character, amenity and environment.	13
Support for or promotion of development of specific site(s).	13
Green Belt should be released for development.	12
Need more affordable housing and robust affordable housing policy, especially due to low past housing delivery, and more information needed on mix.	12
Feedback about the consultation itself, the material, events and publicity.	8
Housing need/Government target too high for Spelthorne/OAN.	8
Need for more public open space, leisure facilities and high quality public realm and existing sites preserved.	7
Need better public transport links and highway improvements to reduce congestion/general congestion issues/specific sites or places mentioned/parking/potholes.	6
Should be greater use of vacant offices, Spelthorne owned land and higher densities to deliver housing units.	4
Technical response from statutory consultee or stakeholder.	4
Objection to development of specific site(s).	3
Consideration should be given to water resources and the environment (flooding, water quality, blue and green infrastructure).	3
Green Belt Assessment - specific comments.	2
Support for increased densities, particularly around transport hubs and town centres.	2
Need for retention of and additional employment land and uses, including flexibility for smaller uses and mixed uses.	2

6. Next Steps

6.1 The Council will be considering the consultation feedback in developing its Preferred Option to be consulted on at the next stage of Local Plan preparation, in accordance

with the Local Development Scheme² timetable. This preparation process will also be guided by a Sustainability Appraisal³ of the possible options, which sets out how each option scores against a list of criteria to ensure our Local Plan meets key environmental, social and economic objectives.

² <https://www.spelthorne.gov.uk/LDS>

³ https://www.spelthorne.gov.uk/media/18307/Sustainability-Appraisal--Issues-and-Options-Draft-Report/pdf/Sustainability_Appraisal_Issues__Options.pdf