Contents

Local Plan .................................................................................................................. 3
Housing ....................................................................................................................... 8
Green Belt .................................................................................................................. 11
Gypsies, Travellers and Travelling Showpeople ....................................................... 15
Open Spaces .............................................................................................................. 17
Infrastructure .......................................................................................................... 19
Heathrow .................................................................................................................. 22
Other ......................................................................................................................... 23
Consultation .............................................................................................................. 26
Local Plan

1. What is the Local Plan?
   - The Local Plan is a key document which will guide development in Spelthorne to 2035. The Local Plan identifies the amount, type and location of development in the Borough.
   - The Local Plan provides the opportunity to set out and address the current and future needs of our Borough. This includes housing needs of all types, planning for infrastructure and where this should go, identifying land for employment use and how best to protect our environment.

2. What stage of the Local Plan are we at?
   - We are consulting on the Preferred Options stage of the Local Plan. This follows the Issues & Options consultation held in May/June 2018 in which we consulted on four options to meet the Borough’s needs. The scenario taken forward from the results of that consultation was to would maximise densities in suitable locations on brownfield land across the Borough, release some Green Belt land for development and include a masterplan for Staines-upon-Thames. This scenario would also take account of visual and recreation amenity value and impacts on receptors. This current consultation sets out our preferred option in more detail and includes draft policies and possible sites for allocation.

3. Why do we have to have a Local Plan?
   - If we don’t have an up-to-date Local Plan, it is much harder for us to refuse planning permission for sites that, if developed, could harm some of the Borough’s most important spaces. We could also be subject to the Government stepping in and writing a Local Plan for us with little say in the process ourselves. We therefore want to be able to make decisions locally and for local people to have full involvement in the process to provide a Plan which delivers homes and employment areas that we need in the most suitable places.

4. Who approves the Local Plan?
   - Following this consultation, there will be a further round of consultation which will be under ‘Regulation 19’, known as the pre-submission version, before the Local Plan is submitted to the Planning Inspectorate to be examined. The examination will be carried out by an independent Planning Inspector on behalf of the Government. The Inspector examines the Plan to determine if it is considered to be ‘sound’. The Council and its councillors decided whether to approve the plan following the Inspector’s decision. If approved, the Plan would be adopted, becomes the development plan document for the Borough and is used to guide decision-making in respect of directing development and granting or refusing planning applications.
5. **How much housing do we need to plan for?**

   - Our need has been calculated by the Government using a standard method based on household growth and affordability of housing in the area. The need for Spelthorne is 603 homes per year over the next 15 years. We think this number is very high, taking account of our Green Belt and flooding areas, so we challenged this method at the time it was announced. We are preparing a Local Plan that aims to meet the need so we can protect land we don’t want developed but will continue to push the Government for the need figure to be reduced.

6. **Who owns the sites put forward for development? Will the Council be developing these?**

   - The vast majority of sites that are proposed to be allocated in the Local Plan for development are privately owned. There are a small number of sites, which are Council-owned and others which are owned by Surrey County Council. Where the site is privately owned, the expectation would be that the landowner will develop the site or sell the land to a developer to do this. There is no requirement for Spelthorne Council to develop these sites.

7. **What is an allocation?**

   - This is the term we use for when land is put forward by the owner to be developed and we set out what it will be used for (housing, employment etc), how many units and what requirements we expect to see included, such as access improvements. This supports the Local Plan by showing we can deliver the homes and other uses we need. The owner will still need to apply for planning permission but the allocation will mean it is acceptable in principle. If a site in the Green Belt is allocated for development, it will be removed from the Green Belt once the Local Plan is adopted. The Draft Allocations document gives the reasons why we think a site should be allocated and also includes sites not being taken forward and why.

8. **How have the draft allocations been selected?**

   - A site selection methodology has been produced which sets out a robust set of criteria against which potential development sites are assessed. This methodology was consulted on publicly in 2018 and can be viewed here. The assessment process uses evidence such as the Green Belt Assessment (GBA) Stages 1 & 2, Strategic Land Availability Assessment (SLAA) and Gypsy & Traveller assessment to assess sites. Officers also considered constraints such as flood risk, land contamination, designated nature sites etc. to assess sites. We looked at the preferred spatial strategy of considering brownfield land, weakly performing GB and urban sustainable locations. We also carried out site visits to ensure that the desktop information was reflected on site and to clarify findings. We undertook a Sustainability Appraisal to assess the social, economic and environmental impacts of developing the proposed sites. Bringing all of these factors together we weighed up the benefits and harm of each site to produce a list of potential allocations. These draft allocations have therefore been considered suitable and in line with the Council’s spatial strategy and are included as part of this consultation.
- The Preferred Allocations document provides a summary of these site assessments and we have a document on our website on the Evidence Base and Supporting Documents called the Preferred Site Allocations – Officer Site Assessments, which provides the detailed assessment of each site. They were carried out by officers in the team, who also visited each site and liaised with other teams at the Council, such as Environmental Health and Sustainability, in order to fully and objectively assess the land and whether it should be considered as a proposed allocation.

- We understand that you may disagree with the conclusions made by officers but this is a consultation and no decisions have been made. We would encourage you to read the detailed assessments, in order to understand why we have reached our conclusions then respond to the consultation with your own views on the proposals. It may be that you have local or historic knowledge that you wish to draw our attention to so we want to hear from you.

9. What are the timeframes for the development of the allocations?

- The Local Plan period runs from 2020-2035 so all development required to meet our needs will have to be delivered during this timeframe. A key aspect of the draft allocations is their delivery and this is broken down into periods of 1-5 years, 6-10 years and 11-15 years in line with the 15 year Local Plan period. When identifying the draft allocations, landowners and site promoters have been contacted and indicated which of these timeframes they believe their respective sites would be considered deliverable. The timeframes for delivery will then have an impact on the timings within the Plan. We will further consider specific sites and their phasing once we have firmed up our allocations and discussed specific matters with regard to delivery with landowners and site promoters.

10. How many of the proposed allocation sites will be taken forward to form the final plan?

- The sites identified in the plan as proposed allocations re required to meet our housing need. We have insufficient sites to provide a buffer whereby some could be dropped at a later date. Therefore if certain sites were not carried forward as allocations further in the plan-making stages, we would be required to identify alternative sites to meet the shortfall in housing provision.

11. What action would the Council take if a developer chose to use their site for something other than as identified in the allocation?

- The Council will have a continual dialogue with landowners through the consultation process. By allocating a site this, in effect, confirms the principle of the development and its use. Therefore, a site allocated for a particular use or type of development would likely only be suitable for that use. The finer details of any development of the allocations will be confirmed at the planning application stage.
12. What is brownfield land?

- Brownfield land is land which has been previously developed and is most often found in the urban area. This land could have been used for employment or other industrial purposes. This land is sought to be developed first as it is often in sustainable locations however this land could also be subject to contamination depending on its previous use and this would need to be remediated before any subsequent development takes place, especially for housing.

13. Will sites be subject to compulsory purchase by Spelthorne BC?

- This could be an option if absolutely necessary but sites promoted to us by developers/landowners have confirmed their availability and it will be up to them to deliver each site. We will be engaging with site promoters and landowners where necessary following the consultation to consider the delivery of each potential allocation in more detail.

14. What is a masterplan for Staines-upon-Thames?

- A Masterplan is a plan that maps an overall development concept, including present and future land use, urban design and landscaping, built form, infrastructure, circulation and service provision. It is based upon an understanding of place and it is intended to provide a structured approach to development. This will be applied to Staines-upon-Thames to create a clear and consistent framework for future growth and development within the town and address local issues such as parking and congestion. The masterplan will take an holistic approach and will seek to incorporate aspects such as the provision of leisure services and other facilities as part of a wider, more diverse offer.

15. What discussions have you had with neighbouring Surrey Boroughs?

- Through the Duty to Cooperate, we are legally required to engage with neighbouring The Council have regular discussions predominately with Runnymede BC, Elmbridge BC, London Borough of Hounslow and Surrey County Council. We also engage regularly with other Surrey, London and Berkshire authorities on various cross-boundary matters where required. The Council have signed Statements of Common Ground (SoCG) with a number of these authorities and this are available to view in greater detail here.

16. What about employment sites?

- We have assessed what our needs are for new employment sites and have proposed some land in the Preferred Allocations, mainly for office and storage/distribution uses as our evidence shows we need these types of businesses but not industrial uses.
17. **What does ‘sustainability’ mean and what is a Sustainability Appraisal?**

- Sustainability focuses on meeting the needs of the present without compromising the ability of future generations to meet their own needs. Sustainability is made up of three main objectives – economic, social and environmental. This is reflected within the sustainability indicators which are included with each of the draft policies. National planning policy emphasises the need for decision-making in planning to take account strongly of these objectives to strike a balance between these and minimise negative impacts. A Sustainability Appraisal (SA) is a tool used to appraise these three objectives. We are required to undertake an SA of the Local Plan, its policies and allocations to ensure that these accord with the three objectives to make sure the Plan is sustainable. Therefore the SA is integral to the plan making process as it helps to demonstrate that the Local Plan is the most appropriate when weighed against the reasonable alternatives.
Housing

1. **When will the Council confront the Government about its high housing target given the constrained nature of the Borough?**
   - The Leader of the Council, Cllr Harvey, and the portfolio holder for the Local Plan, Cllr Beardsmore, and officers met with the Ministry of Homes, Communities and Local Government on 5 November to raise our concerns about the high housing figure for Spelthorne. We are undertaking further work on this topic in-house and will maintain a dialogue with MHCLG but with purdah due to the General Election we cannot disclose detailed information at this stage. We are waiting on a formal response on this matter and are regularly chasing MHCLG to provide this as soon as possible. We will update you further when we are able to.

2. **Why did Spelthorne Council not challenge the number of houses required two years ago when the standard method was introduced?**
   - Spelthorne joined the other Surrey Authorities in objecting to the standard method for calculating housing need. However, at the time our housing need using the previous method was between 552 and 757 homes per year so the standard method figure was towards the lower end of the range we already had. We then objected individually and collectively with other Surrey authorities when the Government would not let councils use the 2016 household growth projections instead of the 2014, which would have seen our need figure reduced substantially. Had we been able to use the 2016 figures, this would have reduced our housing requirement down to approximately 322 dpa. The 2018 projections will likely be made available in mid-2020 and we will monitor how this may impact on housing requirements.

3. **What happens if private development achieves the 603 dwellings per annum requirement? Will the allocated sites remain?**
   - The vast majority of the sites which have been identified as proposed allocations are owned or promoted by private developers who, in most cases, have expressed a desire to develop these sites. The various supplies of housing in Spelthorne are outlined on page 3 of the site allocations document which can be found [here](#). This table details where the supply is forecast to come from as part of our overall requirement of 9075 dwellings over the 15 year plan period. The proposed allocations could accommodate 4320 dwellings which still leaves a significant shortfall that would need to be made up by sites in the planning process currently, smaller sites and other sources such as office to residential conversions. Taken together, all these sources of supply would be required to contribute towards meeting the overall housing requirement as set by the standard methodology. It is therefore not anticipated that there are sufficient sites to meet the housing requirement without developing the proposed allocations.
4. **How will the Local Plan be amended if the Government does agree to reduce the number of houses required? Is it not premature to identify sites before the number of houses has been determined?**

- At present the national guidance sets out that we should use 2014-based household projections to calculate our housing need, therefore we have to work to this figure. Whilst we have laid out our concerns to central Government and we await their response, we have to move forward with the Local Plan process and identify sites for potential allocation. If we do not progress with the Plan, we will have less control and central government may come in and write a plan for us. If we used the lower figure we will face opposition from Government and neighbouring authorities for not trying to meet our housing need in line with current guidance. If the Government agrees to use the 2016 population projections, this could decrease or housing needs to around 322 units per annum.

5. **What is the consequence of not building this number of homes per year?**

- If our Local Plan does not meet the required figure, it is likely to be found unsound by the Planning Inspectorate. We will need to go back and revisit sites to make sure that no stone has been left unturned. If we fail to produce a Local Plan then the Government is likely to intervene and produce a plan for us that we have less control over.

6. **The Stratton Road site was rejected by the Council and the Inspector as reserve housing in the current Local Plan. Can the Council explain the fundamental change in attitude? This is not protecting the Green Belt as the Council has said it would. Nothing on the Stratton Road site has changed.**

- The site was identified as weakly performing Green Belt through our Green Belt Assessment stage 2. The Council did not produce a Green Belt Assessment for the previous 2009 Core Strategy and did not identify the need to release Green Belt to meet needs. Through the Core Strategy we had a need for 166 units per annum but now we have a need for 603 units. As we cannot meet our needs in the urban area alone we need to release some Green Belt land for development. Our strategy focuses on weakly performing land and the Stratton Road site fits this criteria. The site is deemed to play a lesser role in the wider strategic Green Belt and is recommended for release through the GBA2. The GBA2 recommended that the area of land containing the site at Stratton Road, be taken forward for further consideration with regards to its possible release from the Green Belt. The area performs a lesser role due to its smaller scale in the context of the overall gap between Ashford/ Sunbury/ Stanwell and Upper Halliford and its semi-urban character. As such, the area is considered to perform weakly when assessed in the GBA2 document and in line with our spatial strategy to release some weakly performing Green Belt, we have proposed to allocate this site for development.
7. How many of these proposed homes will be council housing which could benefit our vulnerable community members, youngsters or our key workers?

- Our Strategic Housing Market Assessment breaks down our overall housing need figure of 603 homes into the needs of various groups of the community, for example those requiring accessible homes, and indicates how much we need to provide to meet these needs. Our housing policies have been informed by this evidence and each individual site allocation will set out the requirements for different types of homes.

8. Does the Council include the conversion of office buildings to residential use in its housing target?

- Dwellings created by the conversion of office buildings into apartments are included in the housing target figures. The plan needs to strike a balance between the need for housing and for employment. However, the Government has relaxed the planning rules for the conversion of commercial buildings to residential which has made it difficult for the Council to resist the loss of commercial premises through this mechanism.
- The Council, through the Local Plan process, needs to engage with developers and landowners to help achieve its housing targets. However, it has limited powers to intervene to ensure that any development is completed within particular time periods.

9. How many empty homes are in the Borough and can these be used to meet housing needs?

- As of May 2019, there were a total of 423 empty homes in Spelthorne. With a dwelling stock of 42,000, this represents 1% of properties being empty. There is currently no dedicated resources to supporting empty property owners bringing their properties back into use. Whilst the numbers are relatively small in comparison to total dwelling stock, bringing this number of properties back to use would provide significant opportunities for the Council to support homeless households. The Council are looking at ways to do this as part of the new Housing Strategy.

10. How many homeless families are there in Spelthorne?

- The number of rough sleepers in Spelthorne fluctuates however it is thought that around 10 people are sleeping rough across the Borough at any one time. The Council’s housing options team has an active caseload of over 250 households in bed and breakfast or temporary accommodation, of which around 25% are outside Spelthorne.
Green Belt

1. What is the Green Belt?

- Green Belt was introduced in Development Plans drawn up in the 1950s. The primary intention of Green Belt was to halt the sprawl of London and to prevent the merging of other large urban areas. Green Belt land is intended to be kept permanently open and there is a presumption against ‘inappropriate development’ on this land. The NPPF defines the five purposes of the Green Belt as:
  a) to check the unrestricted sprawl of large built-up areas;
  b) to prevent neighbouring towns from merging into one another;
  c) to assist in safeguarding the countryside from encroachment;
  d) to preserve the setting and special character of historic towns; and
  e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2. What percentage of the Borough is Green Belt?

- The Green Belt in Spelthorne covers 3320 hectares which equates to 65% of the total area of the Borough. Green Belt also includes the reservoirs in Spelthorne which represent 26.2% of the total Green Belt area which is 870 hectares.

3. Why have sites in the Green Belt been allocated for development?

- As part of the Local Plan process, there should be a review of Green Belt boundaries. In order to amend Green Belt boundaries, exceptional circumstances must be shown and this can include to meet housing need if insufficient sites can be found on urban land or if neighbouring boroughs cannot assist. If we amend Green Belt boundaries to allow for some development of land that is not performing well against its purposes and if there are no other significant reasons why it shouldn’t be developed, we will lose 1.6% of our Green Belt but this will deliver around 1649 new homes to help meet our need.

4. How do you determine which land in the Green Belt is not performing well?

- The Council appointed consultants to undertake a Green Belt Assessment Stage 1 in October 2017. This assessed the Borough’s Green Belt against the five purposes as set out in the NPPF and listed above.
- This determined which sites were strongly, moderately or weakly performing. In December 2018, a Stage 2 assessment was undertaken which looked in greater detail at sub-areas drawn from the Stage 1 work. This recommended sub-areas for further consideration either in isolation or in combination with other parcels. These sites were taken forward to be considered as part of the site selection process to determine if they would be suitable for development.
5. How can the Council justify the loss of 19 Green Belt sites when it has rejected 29 Brownfield sites? Historically, the Council has stated “the Green Belt is precious to us and the residents and we have always fought very hard to protect it from development”.

- We have not rejected these brownfield sites and these sites are still included within our Strategic Land Availability Assessment (SLAA) and contribute to our land supply. We have decided not to allocate these sites through the Local Plan due to their non-strategic nature and as they could come forward using policies in the Plan. We have identified these sites as suitable for development but they are not allocated – they are expected to come forward as windfall development. This supply is included on page 3 of our site allocations document. The Council have proposed to allocate 19 Green Belt sites as these are necessary to meet the annual housing requirement as set by the Government through the standardised methodology.

6. Why were ARUP selected as consultants to carry out the Green Belt assessment. Did this appointment go through the procurement procedure?

- Spelthorne took the decision to undertake a comprehensive Green belt review as part of the preparation for the emerging Local Plan. We undertook a through procurement process in making the decision to appoint ARUP following a competitive tender to achieve best price and quality. ARUP have a strong history of carrying out detailed Green Belt Assessments.

7. Why do we have to develop land in the Green Belt?

- In order to try and meet the Council’s housing needs as required by the Government, we are required to fully assess all potential development land. There are insufficient sites in the urban areas to meet all of our housing needs and therefore the Council must consider Green Belt land in order to assist with this. Our strategy is to only consider releasing weakly performing sites in the Green Belt, following the Green Belt Assessment. There are a total of 19 sites in the Green Belt allocated in the Local Plan whilst a further 54 Green Belt sites have been rejected and are not considered for allocation.

8. What happens after 15 years at the end of the Local Plan period if all weakly performing Green Belt land has been developed? Will more have to be released?

- The Government requires that all Local Plans be reviewed after 5 years. In a review of the Plan, sufficient land will have to be identified for future planned growth. The Plan period will roll forward at the time of the review therefore the need for growth will run with the new Plan period. This may involve the consideration of a number of options in order to provide for this growth and further Green Belt releases cannot be discounted.
9. What type of land won’t be considered for development?

- Some land in the Green Belt is subject to absolute constraints which cannot be overcome such as land at risk of flooding (flood zone 3b), functional floodplain, common land or land designated for national and international nature conservation. These constraints would preclude development from taking place even if the land were not within the Green Belt, although the majority are.

10. Has regard been given to national planning policy which prioritises previously developed land and sustainable sites in the Green Belt?

- Officers have considered brownfield land in the Green Belt as well as the sustainability of sites, including the provision of public transport and access to local amenities in making decisions through the site selection process. Each site has also been fully assessed through the sustainability appraisal process to score sites on sustainability factors. Officers have also had regard to the Council’s spatial strategy which prioritises weakly performing Green Belt, with the aim of preserving moderately and strongly performing Green Belt and that which performs a strategic function. We have weighed up each of these factors in coming to a decision on each site.

11. How do commercial sites which are previously developed and have no visual amenity contribute to a green belt function?

- Green Belt policy is used to ensure that land within the Green Belt is kept permanently open and free of development so that the spread of urban development is contained.
- If development has taken place on land (either lawfully or unlawfully) and the land is now less attractive, this does not justify the release of the land from the Green Belt as it is still serving its purpose. However, we are taking into account the extent to which a site is previously developed as part of the site assessment methodology.

12. If the Council are successful in having their housing requirements reduced, would this remove the need to develop Green Belt land?

- The Council have met with the Ministry of Housing and Local Government to seek to reduce the housing requirements in the borough. Weakly performing Green Belt sites have been proposed to be allocated in the Preferred Options because we are unable to meet our current housing requirement as set by the Government’s standard methodology on brownfield sites alone. However, were the housing requirement to be reduced to a level where our need could be met through brownfield sites then this would mean there would be less pressure to develop Green Belt sites and these would almost certainly be dropped from the Plan.

13. What about Shepperton Studios?

- The expansion of the studios into the Green Belt has already been granted planning permission on the basis of ‘very special circumstances’ due to the economic benefits it will bring but the land will stay designated as Green Belt. We can review in the future whether the land should be removed from
the Green Belt once the buildings have been completed but for now the land performs an important role and our strategy is not to release strongly or moderately performing Green Belt.

14. What about Kempton Park racecourse?

- The site has been put forward by a developer for a large housing scheme so we have assessed what impact that scale of development would have. Our Green Belt Assessment shows that the land is ‘strongly performing’ and has not been recommended for release from the Green Belt. The Strategic Highway Assessment shows that building 3000 homes at Kempton Park would have a greater impact on traffic than releasing the more dispersed Green Belt sites in our preferred allocations by concentrating development in one area and worsening conditions on routes and at junctions that are already congested. Therefore the site has not been considered suitable as a proposed allocation in the emerging Local Plan.

15. As worked gravel extraction sites are usually filled with water, how much grass-land will be preserved for the future?

- Spelthorne has a number of gravel and mineral extraction sites. Many of these have been worked in the past or are currently being worked at present. As part of applications to work these sites, restoration plans must be approved to show how the long-term condition of the site will be established. Of those sites currently being worked, only one is proposed to be a ‘wet’ restoration in which much of the extraction site is filled with water. The others are proposed to be ‘dry’ restorations with public access and other recreational amenity and benefits. However, these can only be secured once the working of the sites has completed and Spelthorne are continually working with the County Council and the mineral companies to achieve these outcomes as quickly as possible.

16. The land at Stratton Road has gone from strongly performing to weakly performing. The land owner has denied public access to the land, dug trenches and is not maintaining the site well. Does this have an effect on Green Belt performance?

- A landowner can restrict public access to their land if they so wish and can maintain the land as they see fit. Public access does not have an impact with regards to Green Belt performance and the role it plays. Green belt performance is measured against the five main purposes as listed in Q1 and if a parcel of land does not meet some or all of the main purposes then it could be considered to playing a lesser role and could be taken out from the Green Belt designation.
Gypsies, Travellers and Travelling Showpeople

1. Why are you allocating pitches for Gypsies, Travellers and Travelling Showpeople (GTTS)?

- These communities are part of our population and we should meet their need, just as we are doing for the ‘settled’ community. This is calculated by assessing how families already living in Spelthorne will grow during the 15-year plan period. The pitches will be for our GTTS community to live on when they are not travelling and are not for seasonal travellers who pass through our Borough and camp illegally.

2. Are traveller sites permanent and how many pitches will they accommodate?

- The pitches being provided in the Plan will be permanent. Each of the pitches will accommodate one household. A pitch is an area which typically contains enough space for one or two caravans, but these can vary in size. A site is a collection of pitches which form a development specifically for Gypsies and Travellers. For Travelling Showpeople, the most common descriptions used are a plot for the occupation by one household and a yard is a collection of plots which typically occupied by Travelling Showpeople.

3. How would the sites be managed?

- The traveller sites would be laid out with defined pitches within a designated area of land. Each site would have its own facilities to support the users and to fully accommodate the necessary pitches. Each site would have a site manager or similar who would be in charge of the day-to-day running of the sites. By being able to formally lay out the pitches within a designated area, this would allow for enforcement action to be taken against unlawful pitches set up beyond the defined boundaries of the respective gypsy and traveller sites.

4. The Local Plan considers ‘settled’ gypsies and travellers but what will happen to those who are in transit?

- The Borough is required to meet the needs for its GTTS community to live on. However, we do not believe that that Spelthorne is a suitable location for transit pitches for those travellers who are seasonal or who move regularly. There is a Surrey-wide requirement to provide transit pitches however we believe this should be accommodated elsewhere in Surrey. We are on the edge of London rather than being centrally located in Surrey, which is where we believe a Surrey-wide pitch should be provided. Surrey Leaders and Chief Execs are working together with Surrey Police to find a solution.

5. How will you stop the gypsy and traveller sites from being untidy?

- By providing specific sites to provide for GTTS needs, this allows for the required infrastructure to be included as part of the site. This will include providing suitable accesses to the sites, providing facilities for day to day
use and organising waste disposal from the sites. As referred to in Q3 above, the sites would have a site manager or similar role to manage the day to day running of these sites. Government design guidance for gypsy and traveller sites means that these tend of much lower density than bricks and mortar sites at a maximum of 15 pitches per site. Good practice guide for gypsy and traveller pitches sets out that a maximum of 15 pitches is conducive to providing the best functioning site.

6. Does the Council have any powers to select who will be given a plot on the Gypsy and Traveller sites?

- This would be dependent on whether the site is owned by the Council or by privately. If the Council own the site, then plots could be allocated on the basis of need in much the same way as housing is to those on the housing register. A Council-owned site would give opportunity for a greater level of management from a Council perspective.

7. What kind of ‘equipment’ will be kept on travelling show people land? Where would their vehicles be parked?

- Travelling showpeople are defined as members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). Although their work is of a mobile nature, showpeople nevertheless require secure, permanent bases for the storage and repair of their equipment and to live when not on the road. This is particularly required over the winter months and when there is a need for carrying out repairs or other forms of essential maintenance. On the plots, it would be proposed that there are additional spaces for vehicles to park to avoid on-street parking.

8. Why was there no communication with residents regarding the proposed Gypsy and Traveller sites?

- The Council published the draft allocations and policies documents as part of the Preferred Options consultation stage of the new Local Plan on 5 November. These documents are widely available online, in the Council offices and in local libraries. The details of this have also been published in the winter edition of the Bulletin and promoted via social media. It would be unusual for the Council to consult directly with residents ahead of a consultation. The consultation allows opportunity for residents to read the documents and evidence base supporting this and to make detailed comments on these.
Open Spaces

1. What will happen to the open spaces in the Borough?
   - Open spaces in the Borough are protected by the NPPF and a specific policy has been developed as part of the new Local Plan. The policy seeks to maintain current provision and meet identified deficiencies in open space across the Borough. The assessments of open space is covered by the Open Space Assessment which covers public open space and the Playing Pitch Strategy which includes playing pitches, outdoor sports facilities and other recreation sites both public and private.

2. What will happen to the Protected Urban Open Space (PUOS) designation?
   - We are reviewing the PUOS designation as part of the Local Plan. PUOS was applied in 2001 Local Plan however its impact in protecting spaces from development has not always been successful. We therefore intend to replace PUOS designation with Local Green Space, which is in national policy and provides a more robust protection for these spaces. We consulted on this change in the 2018 Issues and Options consultation.
   - This consultation is not proposing sites for designation as LGS. A separate consultation will be held early in 2020 to allow opportunities for residents and others to put sites forward for consideration as Local Green Space. Not all sites will be suitable for this protection and this is outlined in the methodology. All current PUOS sites will be assessed against the methodology and, where appropriate, will be afforded LGS status.

3. What is Local Green Space?
   - Local Green Space is an additional layer of protection that can be applied to spaces which have local value and community importance. LGS is akin to Green Belt in terms of its level of protection however Planning Policy Guidance is clear that this should not be used as a means ‘to try to achieve what would amount to a new area of Green Belt by another name’. LGS should be used for those sites which have community importance and value and this sets them apart from other open spaces.

4. How do I apply for a site to be protected as Local Green Space?
   - A methodology for applying the Local Green Space (LGS) protection has been drafted and is included within the evidence base for the Local Plan as part of this consultation. This methodology will be used to assess sites put forward for consideration as LGS. There will be an opportunity to submit sites as part of the separate consultation phase which will follow the conclusion of the preferred options consultation.

5. What will happen to other open spaces if they are not given Local Green Space protections?
   - All open spaces are protected through the NPPF as stated in paragraph 96 and our own local policy will align with the NPPF in this regard. If a site is
not considered suitable for Local Green Space, this does not mean that its protections are weakened. An audit of existing provision has been undertaken through the Open Space Assessment and Playing Pitch Strategy. These assessments identify any deficiencies in the Borough which need to be addressed over the Plan period. The Council will therefore seek to meet the identified deficiencies where possible and maintain the existing level of provision as a minimum.
Infrastructure

1. **How will our infrastructure such as GPs, schools and roads cope with an increase in residents?**

   - We are working with infrastructure providers, including healthcare, education and highways, so they can plan for our future growth. By having a Local Plan in place, this will identify areas which are lacking in services and other social facilities which can be addressed over the Plan period. There is funding available to help support this from contributions developers will pay when they build their sites. Infrastructure will be dealt with through the Infrastructure Delivery Plan (IDP) which will support the Local Plan. The IDP identifies the Borough’s infrastructure requirements including social, physical and green infrastructure. The IDP sets out what is needed, where it is needed and when it is needed. It then provides an update on the delivery of the required infrastructure to date. The IDP will be undertaken following the Preferred Options consultation, taking into account responses to this, and will be progressed in line with the development of the Local Plan.

   - We recognise the importance of adequate infrastructure for both existing and proposed development. Specific arrangements can be put in place to manage construction traffic at individual site. These are secured through planning conditions and highway agreements with the County Council. Where damage to roads and footpaths has occurred due to construction vehicles this remains the responsibility of the County Council in its role as highway authority.

2. **With all the proposed development, when will there be improvements to infrastructure – GPs, schools etc**

   - Following this round of consultation we will undertake the Infrastructure Delivery Plan (IDP) which will look at the infrastructure requirements of the borough. The study will identify new infrastructure needs as well as gaps in existing provision. The study will also identify the providers responsible for delivery, the cost of provision, and detail how applicable costs can be expected to be funded. Through the IDP and the Local Plan we will be able to identify infrastructure needs, as well as shortfalls, in order to facilitate the Borough’s forecasted growth. Once site allocations have been finalised through the plan we will be able to look at the infrastructure needs on a site specific basis.

3. **Who provides the infrastructure for these new developments?**

   - Much of the required infrastructure is provided for by Surrey County Council. The County are responsible for highways and education provision in Spelthorne. Other key stakeholders involved in infrastructure provision include water suppliers such as Thames Water and Clinical Commissioning Groups (CCGs). The CCGs are clinically-led statutory NHS bodies which are responsible for the planning and commissioning of health care services for their local area. We are engaging with these key infrastructure stakeholders as part of the on-going work for the Local Plan as well the CIL.
process. We have a dedicated group of officers, the Infrastructure Advisory Group (IAG), who are meeting with these providers to discuss infrastructure needs and shortfalls.

4. What is CIL?

- CIL is the Community Infrastructure Levy which is a charge that local authorities can set on new development in order to raise funds to help to fund infrastructure facilities and services – such as schools or highway improvements – which may be required to support new homes and businesses. Spelthorne has had a CIL charging schedule – which sets out our agreed rates for new developments – since April 2015. CIL is specifically designed to enable the provision of new infrastructure which is required to support the growth required in the plan. It is not therefore available to deal with existing problems. More information on CIL can be viewed [here](#).

5. How will infrastructure be considered and what is guaranteed as opposed to proposed?

- At this stage of the development of the Local Plan we cannot say that any infrastructure is absolutely guaranteed however as referred to we are to carry out further studies such as the IDP and Staines masterplan. These studies will ascertain our infrastructure needs and by working with the key providers we will be pushing for that need to be met.

6. How will the roads cope with additional pressure as a result of development?

- Surrey County Council have undertaken traffic modelling for the new Local Plan, which can be found within the Draft Strategic Highways Assessment document which can be found [here](#). This modelling has considered the Council’s preferred option for growth as consulted upon in this consultation, as well as options we do not propose to take forward such as developing Kempton Park. The impacts of our preferred option were not identified as ‘severe’ which is the NPPF’s threshold for rejecting development on highway grounds, subject to mitigation to improve affected routes and junctions. As part of the new Local Plan, we are seeking to encourage sustainable and active transport modes to minimise short car journeys to enable residents to have the opportunities to take up these.

7. Which proposed allocation sites met the ‘severe’ threshold to reject development on highway grounds?

- For the Preferred Options consultation, highway modelling has been carried out on all the proposed allocations within the draft Plan as a whole as opposed to on an individual basis. Each proposed allocation, when confirmed, will be subject to individual highway assessments to identify any impacts or mitigation measures deemed necessary to facilitate the development of the sites.
8. How will you provide parking in Ashford if the multi-storey car park is to be developed?

- The Council have undertaken parking surveys to identify how current need is met and how future need could be accommodated. Re-development of the multi-storey car park will seek to retain some parking provision. We are working with Surrey County Council to address parking issues on Church Road and this will be an important part of the Infrastructure Delivery Plan. We are aware of the local issues of parking on Church Road and we are looking at a number of options to improve the situation.
- The Council is keen to promote alternative sustainable modes of transports where possible and aim for a modal shift away from the use of the private car. In order to support such a shift, the appropriate infrastructure will need to be in place. Studies to explore this further will be undertaken once this round of consultation has been completed.
Heathrow

1. To what extent have Heathrow expansion plans informed the Local Plan?

- We have considered which sites Heathrow are likely to include within their own Development Consent Order (DCO) boundary, which are mainly in the Green Belt, but it is for us to consider which we decide to allocate for development, with or without expansion. Most of the sites we expected to be within the boundary are still within it, from Heathrow’s latest consultation material, and this includes sites for car parking, cargo and surface water treatment. Where we agree those sites could offer that type of development and if releasing the site from the Green Belt accords with our strategy to only release weakly performing Green Belt, we have included them as potential allocations in the new Local Plan. If the DCO is considered before our Local Plan is adopted, which we anticipate will be the case, it will still be for Heathrow to argue there are very special circumstances that warrant developing in the Green Belt as these sites will only be released when the Local Plan is adopted. There is scope to further consider the implications of Heathrow Expansion on Spelthorne and the Local Plan during the process but the preferred allocations have been based on the information available to us at the time so things can change if the expansion plans change.

2. How will Heathrow expansion impact on the Borough, particularly Stanwell Moor?

- Heathrow Airport Limited recently consulted on the expansion plans for the Airport. These plans include land to the north of the Borough being subject to proposed development to facilitate the expansion. Sites which are proposed for development and are in the Green Belt will require Heathrow to demonstrate ‘very special circumstances’. Spelthorne Council has produced a detailed and comprehensive response to the consultation, highlighting the issues and impacts on the Borough. More information on the expansion proposal and Spelthorne’s formal response can be found here.

3. How will Heathrow’s expansion plan be determined?

- Heathrow’s expansion plans will need to be submitted as a Development Consent Order (DCO). This is because the proposed expansion is a Nationally Significant Infrastructure Project (NSIP). The DCO will be dealt with by the Planning Inspectorate and it is anticipated that Heathrow Airport Limited will submit the DCO in 2020.
Other

1. Will air quality be considered in the Local Plan process?

- The whole of Spelthorne is an Air Quality Management Area (AQMA) and this is an important issue for the Local Plan. Air quality is an important environmental issue that we will consider in the Local Plan process, including expert advice from officers in our Environmental Health team. Nitrogen dioxide (NO₂) is the principal pollutant of concern for Spelthorne and mainly arises from vehicle emissions, particularly on larger roads and where there is slow moving or stationary traffic. The new Local Plan will lead to an increase in developments and therefore that will result in an increase in residents and employees so it is likely there will be extra cars on the road. As we look at options for meeting our development needs, we need to consider how best to do so without causing air quality to worsen.

- Individual site assessments for the proposed allocations consider the effects of air pollution especially in those locations where levels are already high. As part of this, we have a draft policy to address this as part of the new Local Plan and this will be applied where necessary for new developments. Air quality impacts have also been considered through the Sustainability Appraisal and an indicator has been included for this on each draft site allocation in the Plan.

2. Has the Council carried out an environmental assessment of the increased pollution resulting from development in an already prejudiced and compromised environment due to the M3, Heathrow and Charlton Lane Eco Park?

- We have given consideration to this through the Sustainability Appraisal, which assesses social, economic and environmental impacts including pollution. We will be holding discussions with landowners where appropriate following the current consultation to determine how adverse impacts can be mitigated. Consideration will also need to be given to this in more detail at the planning application stage.

3. Will climate change be addressed in the new Local Plan?

- The Council will seek to use the opportunity of the new Local Plan to implement a stronger policy approach on climate change. To do this, sustainable design and construction will be integral to new development. This will include enhanced energy efficiency and opportunities for integrating the use of renewable and low carbon energy. There will also be opportunities for new developments to connect to existing or new combined heating and power sources as alternatives to current energy supplies. This will allow opportunity for proposals for zero carbon development and use of renewable sources of energy. The Staines Masterplan will allow for these opportunities where a more comprehensive approach is able to be taken.

4. Development could lead to a devaluation of surrounding homes, what will the Council do about this?

- We understand that residents will be concerned over the potential for homes to devalue and this concern is shared by communities in other areas
too. This is not a planning consideration we can take into account for the Local Plan, just as it’s not for planning applications either. If you want to make comments on a proposed allocation, you should focus on things like the effect on your amenity, which includes outlook, the existing use of the land, access arrangements and nature conservation, which are all material planning considerations.

5. Why has the Strategic Flood Risk Assessment (SFRA) not been completed at this stage?

- The Council have a draft interim SFRA produced by the consultants AECOM as part of the evidence base. This is due to the need for the latest Environment Agency flood maps to be published to inform this work. Following the consultation, the SFRA will be updated to assess the proposed allocations and include the most up-to-date flood maps.

6. How much consideration has flooding been given where there are proposals to build on Green Belt land?

- The Strategic Flood Risk Assessment (SFRA) has looked at flooding across the Borough. The Local Plan will not allocate sites within the functioning flood plain (Flood zone 3b) however flood zone 2 is having to be considered for some development due to the need to provide for a significant number of homes. Once the allocated site have been finalised, our consultants will undertake the SFRA stage 2 which will consider in greater detail flooding risk at the specific sites. Mitigation measures will also be considered to help to alleviate flood risk both from fluvial flooding and ground and surface water flooding.

7. A number of Surrey CC sites, including Shepperton Youth centre have been included in the Plan, what will happen to these?

- The Surrey CC sites that have been included as draft allocations have been put forward as available following discussions with the County. However, we have stipulated within the draft allocations for these sites that all existing services must be re-provided so as to ensure there is not an impact on community needs. These sites will only come forward if this condition is met to our satisfaction. An example of this could be relocating existing services to another site or putting services on two or three sites onto a single site but where there is no loss in existing provision. The details of this will be dealt with in a planning application put forward by the County where this will be required to be demonstrated as and when required.

8. I have a site to put forward, how do I do this?

- The Council have previously held a Call for Sites process whereby landowners and their representatives are able to submit sites for development to be considered as part of the new Local Plan. Sites submitted through this have been included in the Council’s Strategic Land Availability Assessment (SLAA) 2019 which has been included with the consultation. The Council will update the SLAA annually and will accept the submission of sites to help to update this. There will be opportunity for a Call for Sites in 2020 to be held following the consultation period as part
of this process. This will provide the opportunity for additional sites not already submitted to be done.
Consultation

1. How can I respond to the consultation?

- The full Local Plan Policies and Sites documents are available to read on our website along with all of the research and evidence documents which supports them. You can respond online [www.spelthorne.gov.uk/localplan](http://www.spelthorne.gov.uk/localplan)

**The consultation has been extended until Tuesday 21 January 2020**

The original consultation period (ending on 7 January) already exceeded the statutory minimum 6 weeks to take account of the Christmas break. However, the General Election wasn't originally expected and therefore we've again extended the period within which local residents can respond. The consultation will now run until Tuesday 21 January 2020 and gives another two weeks for residents to give their views on the proposed allocations and policies.

We understand there are a lot of documents but most local people may not wish to read all of them and can focus on the proposed allocations and policies that will affect them. We have aimed to produce material containing different levels of detail, ranging from the summaries that are included in the public briefing presentations and the Bulletin to the full documents, depending on how much people may wish to find out.

2. What consultation events are you running?

- We are holding a number of evening events at the Council Offices on the following dates:
  
  i. Tuesday 12 November at 7pm  
  ii. Thursday 14 November at 7pm  
  iii. Monday 18 November at 7pm  
  iv. Wednesday 27 November at 7pm  
  v. Wednesday 10 December at 7pm  
  vi. Monday 16 December at 2pm  
  vii. Tuesday 17 December at 7pm  
  viii. Wednesday 8 January 2020 at 7pm  
  ix. Monday 13 January 2020 at 7pm  

- The public events have now ended however we accept written comments up until the deadline on 21 January. We can also continue to receive questions regarding the Local Plan via e-mail and we will endeavour to respond to these as quickly as possible.

- We initially arranged three public sessions in November which were very popular and well attended. We have released a number of further dates as outlined above. The winter edition of the Bulletin has been delivered to every household in the Borough during the first week of December and this contains an 8 page pull out specifically relating to the Local Plan and the draft policies and draft allocations.
3. **What happens to my comments?**

- All comments submitted must be in writing and these will be reviewed once the consultation has ended and a schedule of representations will be produced with a summary of the comments made.

4. **What comments won’t be considered?**

- We will not accept comments that include abusive, racist or other discriminatory or inflammatory language. Please consider that a human being will be reading your representation and that it will eventually be made available for public inspection so we ask that you are respectful in your language. We will also not be able to accept anonymous comments.

5. **Can Spelthorne residents make a petition directly to the Government against the housing targets?**

- Residents can write to Kwasi Kwarteng, the elected Member of Parliament for Spelthorne or the Ministry for Housing and Local Government (MHCLG) if they wish to. However any comments specifically in relation to the Local Plan Preferred Options consultation should be submitted through the consultation portal on the Spelthorne website or in writing directly to the Council.

6. **Where can I find more information?**

- You can find all the information on the consultation and the Council’s published evidence base documents on our website: [www.spelthorne.gov.uk/localplan](http://www.spelthorne.gov.uk/localplan).

  You can also call the Strategic Planning Team on 01784 451499.