

Spelthorne Local Plan – Preferred Options Consultation Response Document



Spelthorne Takes Shape

September 2020
Final Report



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Status of this document

The purpose of this document is to set out the responses to the Preferred Options consultation undertaken by Spelthorne Borough Council as part of its preparation of a new Local Plan. The 11-week consultation took place between 5 November 2019 and 21 January 2020. The document provides a summary of the responses received and some brief comments from Planning Officers, setting out reasons for how the Plan was drafted prior to the consultation. It does not make any decisions nor indicate which sites may be taken forward or removed. These issues will be considered and decided upon by Members of the Council, following advice from officers, as the next stage of the Plan is prepared.

1. Introduction

- 1.1 The purpose of this document is to set out the responses to the Preferred Options consultation undertaken by Spelthorne Borough Council as part of its preparation of a new Local Plan.
- 1.2 The 11-week consultation took place between 5 November 2019 and 21 January 2020 and was in the form of Policies and Site Allocations documents setting out the preferred approaches to be considered.
- 1.3 We are grateful to all of those who took the time to attend one of the presentations or respond to the consultation. Some of the responses we received have been very detailed and we appreciate the time invested in them.
- 1.4 The responses to this consultation will be used by the Council to assist in preparing its Publication Local Plan (Regulation 19), the next stage of producing the new Plan. The timetable for the production of the Local Plan is set out in the Local Development Scheme (LDS) which is available online. It will be updated as necessary. The Local Plan Task Group are re-examining both site allocations and policy wording and will make recommendations to the Council's Cabinet before public consultation on the next stage of the Local Plan takes place. Following this final consultation the Local Plan will be submitted to the Planning Inspectorate for an Examination in public when those who have requested to can attend and discuss their concerns with the inspector.
- 1.5 Producing the summary of responses has been delayed by officer involvement in the Council's COVID-19 response effort.

2. Preferred Spatial Strategy

- 2.1 The Preferred Spatial Strategy consulted on aimed to meet Spelthorne's housing needs by releasing some weakly performing Green Belt, intensifying development in urban areas and by producing a masterplan for Spelthorne's largest town, Staines upon Thames, to seek further opportunities for growth beyond the sites identified in our Strategic Land Availability Assessment.
- 2.2 Production of the Staines Masterplan has begun and is expected to be complete by the end of 2020, in time for the Regulation 19 consultation of the submission version of our Local Plan early next year. This will enable both to be considered together as the masterplan will be key to supporting our assumption on growth in the town.

3. How we engaged with people

- 3.1 We engaged with people prior to and during the consultation period in the following ways:
 - Special edition of the Council's Borough Bulletin magazine with an eight-page Local Plan Consultation pull-out in the centre and full front page, which was delivered to all 45,000 households in the borough.
 - Link from front page of the Council's website throughout the consultation.
 - Web-based consultation information and purpose-built online portal for responses.
 - Presentation to Local and County Councillors.
 - Presentation to local Residents Associations.

- 1,276 emails and 244 letters sent out to Stakeholders on our consultation database.
 - 9 x public presentations at the Council Offices.
 - Offered to attend residents association meetings (not taken up as members attending our own briefings).
 - Posters on all of the borough noticeboards.
 - Articles in various newsletters, e.g. Spelthorne e-news, 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.
 - Information available at the Council Offices reception and in the borough's five libraries.
 - Footer on external Council emails promoting the consultation.
- 3.2 In total we received 2,096 representations from approximately 437 respondents. A representation can vary from a single line to reports from a planning professional which run to hundreds of pages.
- 3.3 In addition, seven petitions were received by the Council against the proposed development on a number of proposed allocation sites. Six of these, which related to five areas of the borough, were presented to the Council's Cabinet on 29 January:
- Charlton Village – 609 signatories
 - Land between Old Charlton Road and the M3, Shepperton – 280 signatories
 - Stratton Road, Sunbury – 534 signatories
 - Land to the west of Town Lane, Stanwell – 227 signatories on 2 petitions
 - Land adjacent to Windmill Gate Estate, Sunbury – 232 signatories
- 3.4 The seventh petition with 5,270 signatories was received by the Council at the 27 February meeting requesting that none of the 19 Green Belt areas currently identified in the Local Plan for development are released and to protect the entire existing Green Belt in Spelthorne for generations to come.
- 3.5 We are grateful to all of those who took the time to respond to the consultation. Some of the responses we received have been very detailed and we appreciate the time invested in them.

4. Summary of Key Issues

- 4.1 Many individual comments were made in response to the policies and allocations proposed 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 in Table 1.

Table 1: Key Issues and Number of Times Raised

Issue	Number of times raised
Roads/Congestion/Highway Safety	1,189
Green Belt	957
Infrastructure	942
Housing	636
Biodiversity and Wildlife	615
Pollution – Air/Noise/Water	473
Flooding	455
Site specific issues	449
Too much development in a specific location	340
Character of Area	285
Outlook/Visual amenity/Landscape	224
Heathrow	181
Climate Change	163
Privacy/Safety of residents	163
Employment/Business issues	159
Gypsies and Travellers	133
Health and Wellbeing	132
Eco Park	132
Heritage	122
Officer site assessments and process	121
Support	103
Crime/Fear of crime	99
Property value	95
Shepperton Studios	87
Consultation process	65
Surrey County Council asset review	58
Staines Masterplan	42
Minerals and Waste	40
Kempton Park	36
Planning history of site	33
Conflict with other policies/site allocations	28
Alternative site suggested	28
Viability	20
Esso Pipeline/Pipelines	19
Plan Period	2
BP	1

- 4.2 Common issues raised in relation to the topics set out in Table 1 can be summarised as follows:

- Many comments disagreed with the notion of considering further high rise development but many also felt that we should be increasing densities to save Green Belt land.
- Concern over negative impacts on biodiversity and wildlife.
- Need for more affordable housing and a greater mix of homes across Spelthorne.
- Concern over loss of Green Belt and other open space.
- Adequate attention must be given to Climate Change.
- Concern over the impact on infrastructure, especially health services, school places and local roads.
- Spelthorne should prioritise brownfield land and Green Belt should only be considered as a last resort.
- Too much housing proposed and a disagreement with the use of older 2014-based household projections to inform housing need figures.
- 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. However concerns over the level of development proposed through the Masterplan.
- Concern over increased air and noise pollution with additional development.
- Potential changes to distinct local character.
- Concern over crime and increased fly-tipping.
- Concern regarding the potential increase in flood risk.

5. Key Themes

5.1 The following section sets out the key themes that arose through the Preferred Options consultation. A summary of the points raised and corresponding officer response is set out in the tables below.

- Green Belt
- Housing
- Health
- Education
- Biodiversity
- Leisure & Open Spaces
- Flooding
- Transport
- Environmental Pollution
- Heathrow
- Heritage
- Character of Area
- Consultation Process
- Other Issues

Green Belt

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
1. Green Belt is permanent and should not be built on	<p>1.1 Against the development of Green Belt land.</p> <p>1.2 Green Belt should not be built on in any circumstances.</p> <p>1.3 The release of sites will set a precedent for more release.</p> <p>1.4 Development could result in urban sprawl and the merging of settlements.</p> <p>1.5 Development will break up the Green Belt.</p> <p>1.6 Once Green Belt is built on it is lost forever.</p>	<p>1.1 – 1.2 Paragraph 136 of the National Planning Policy Framework 2019 (NPPF) sets out that “once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans”. As such, the Local Plan provides a mechanism to consider if exceptional circumstances exist to justify Green Belt release. Paragraph 137 of the NPPF sets out that all other reasonable options should be examined before concluding if exceptional circumstances exist. Spelthorne BC has adhered to national policy in its decision to consider Green Belt land for release.</p> <p>1.3 It is only through the Local Plan that Green Belt boundaries can be amended, with Local Plans subject to review every five years. The identification of parcels for potential release followed the recommendations set out in the independent Green Belt Assessment. This assessed the Green Belt against the five purposes as set out in the NPPF, as well as giving consideration to the role of each site in the wider strategic Green Belt. As such, each parcel identified for release was deemed to be weakly performing against the criteria set out in national policy and based on technical evidence.</p> <p>The Green Belt Assessment stage 2 (GBA2) considered how the release of each parcel could potentially impact the performance of neighbouring parcels. Where a negative impact was identified, parcels were not recommended for further consideration. This means that those parcels identified for further consideration could be released without jeopardising wider Green Belt land and having a negative knock on impact on the surrounding land to weaken its role.</p> <p>In addition, the Green Belt Assessment provides advice on strengthening boundaries to maintain the role of Green Belt parcels beyond those identified for release.</p> <p>1.4 Paragraph 134 of the NPPF 2019 sets out the five purposes that the Green Belt serves. Points a) and b) are as follows:</p>

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		<p>a) To check the unrestricted sprawl of large built up areas b) To prevent neighbouring towns merging into one another</p> <p>Local areas and smaller sub areas were assessed through the Green Belt Assessment stage 1 and 2 against the NPPF Green Belt purposes. One or more criteria was developed for each purpose using both qualitative and quantitative measures and a score out of five was attributed to each criterion. Any sub area scoring relatively weakly, weakly or very weakly (score of 1 or 2) across all NPPF purposes was judged to be weak. Any sub area scoring strongly or moderately (score of 3-5) against any of the purposes was deemed to play a role and was judged to be moderate or strong Green Belt. The identified potential allocation sites followed the GBA2 recommendations, therefore the release of the identified parcels is not considered to result in risk to the potential merging of settlements or sprawl.</p> <p>1.5 The Green Belt Assessment stage 2 identified parcels within a 250m buffer around the urban area. The assessment focussed on land bordering the urban area to promote sustainable patterns of development, in line with national guidance. The assessment considered the implications of releasing each individual parcel on the surrounding area in order to avoid 'breaking up the Green Belt' and maintaining its strategic role. The identified potential allocation sites are all at the edge of the urban area to maintain the wider strategic role of the Green Belt and its integrity.</p> <p>1.6 Development of the Green Belt will result in permanent changes therefore we need to ensure that we follow a logical and informed approach. National government have informed us that we need to provide over 600 new homes a year however we are unable to deliver this within the urban area alone.</p> <p>Our preferred spatial strategy focusses on weakly performing Green Belt so that we only consider that that is not meeting the NPPF purposes. This will ensure that our most important Green Belt is protected whilst we are</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
		able to address our housing needs on land that does not fulfil the purposes of Green Belt as set out in national policy.
2. Brownfield land should be built on	<p>2.1 Prioritise brownfield land/previously developed land.</p> <p>2.2 Alternatives should be pursued first i.e. empty homes, offices, commercial land etc.</p> <p>2.3 The Council has rejected urban sites from the Local Plan.</p> <p>2.4 An alternative study by the North Surrey Green Party shows the urban area can accommodate all development.</p>	<p>2.1 – 2.2 The preferred spatial strategy for the Local Plan focusses on increased densities in town centres and where character can accommodate it; releasing some weakly performing Green Belt; and making use of a masterplan for Staines upon Thames. This option seeks to maximise the number of dwellings in the urban area and on brownfield land, subject to character considerations.</p> <p>Paragraph 137 of the NPPF states that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, local planning authorities should a) make as much use as possible of suitable brownfield sites and underutilised land; b) optimise the density of development. The preferred spatial strategy adheres to this and seeks to boost housing delivery in the urban area and increase densities. The Strategic Land Availability Assessment (SLAA) sets out the sites identified in the urban area to meet development needs and an approximate density (https://www.spelthorne.gov.uk/SLAA). Unfortunately there is not enough capacity within the urban area to deliver over 600 new homes each year, as required by the Government.</p> <p>2.3 The Spelthorne Local Plan: Preferred Site Allocations 2019 document sets out the sites identified for potential allocation and those discounted from consideration.</p> <p>We have not rejected these brownfield sites – these are still included within our Strategic Land Availability Assessment (SLAA) and contribute to our land supply. As the table on page 80 of the Spelthorne Local Plan: Preferred Site Allocations 2019 document sets out, where sites have been discounted from allocation they have been retained within the Strategic Land Availability Assessment.</p> <p>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.</p>

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		<p>We have identified these sites as suitable for development but they are just not allocated – they will come forward as windfall development. This supply is included on page 3 of our site allocations document.</p> <p>2.4 The alternative study is not considered to be realistic in its density assumptions. The densities proposed by the Council take account of the character of each area and the types of dwellings i.e. flats or houses, that could be suitably accommodated. This approach is based on densities in the wider area to allow the height/volume of local buildings and characteristics to be taken into account and reflected on potential development sites.</p>
3. Green Belt Assessment	<p>3.1 The Green Belt should not be assessed by a paper exercise.</p> <p>3.2 Green Belt has a role in protecting the environment and as a pollutant receptor.</p> <p>3.3 Why are sites deemed to be weakly performing Green Belt?</p> <p>3.4 Issues with the Green Belt Assessment.</p> <p>3.5 Methodology of GBA applied inconsistently.</p> <p>3.6 Why is the Bugle Nurseries site considered to be strongly</p>	<p>3.1 The purpose of the assessment is to provide evidence of how different areas perform against Green Belt purposes set out in national policy. Although the NPPF does not provide explicit guidance on how to carry out a Green Belt Assessment, Planning Advisory Service (PAS) guidance, experience by consultants ARUP and by other local authorities have been used to produce a methodology most suited to the local context of Spelthorne. As such, it is considered that using the five purposes set out in the NPPF and the associated criteria is the most robust way to assess the fulfilment of the Green Belt purposes. The scoring system employed, along with the various criteria used, is considered the most robust and suitable way of assessing Green Belt performance against the NPPF purposes in the context of Spelthorne.</p> <p>The purpose of the Green Belt Assessment is to provide up to date evidence about the extent to which each part of it in Spelthorne still meets the purposes defined in national policy. Such evidence will be essential to demonstrate the continual protection of the Green Belt through the new Local Plan and will help to identify areas that do not fulfil the purposes of Green Belt.</p> <p>National guidance sets out that the Local Plan should be underpinned by relevant and up to date evidence. As such, the Council must utilise robust</p>

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	<p>performing when part of the site is previously developed?</p> <p>3.7 Risks that owners of unkempt land could cash in through development.</p> <p>3.8 Release will encourage landowners to alter sites so they become weakly performing.</p> <p>3.9 Why have Local Areas been assessed as strongly performing at stage 1 and then weakly performing at stage 2?</p>	<p>and technical evidence to inform its decisions. Most local authorities in Surrey and the wider area have undertaken a Green Belt Assessment to consider the performance of Green Belt land through the Local Plan in order to help meet development needs, given the constrained nature of the South East and the inability to meet needs in the urban area alone.</p> <p>3.2 National policy indicates that Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns 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.</p> <p>The Green Belt Assessment focuses on the NPPF purposes and the strategic function of Green Belt. Whilst Green Belt does hold some environmental value by its nature, these factors are not primary to the fundamental aims of Green Belt which is to prevent urban sprawl by keeping land permanently open. Environmental impacts have been considered through the Sustainability Appraisal (SA) and will be further considered through the next SA stages as the Local Plan progresses.</p> <p>3.3 The Green Belt Assessment provides a technical measure of the performance of each Green Belt parcel within Spelthorne. Green Belt serves five purposes and if land does not perform any of these functions it can be deemed weak. One or more criteria was developed for each purpose using both qualitative and quantitative measures and a score out of five was attributed to each criterion. Any sub area scoring relatively weakly, weakly or very weakly (score of 1 or 2) across all NPPF purposes was judged to be weak Green Belt. Any sub area scoring strongly or moderately (score of 3-5) against any of the purposes was deemed to play a role and was judged to be moderate or strong Green Belt. The identified potential allocation sites followed the Green Belt Assessment Stage 2</p>

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		<p>recommendations, with the most valuable and important Green Belt identified to be retained. The Green Belt Assessment is considered to follow a logical, robust and consistent approach that gives due consideration to each parcel using the criteria set out.</p> <p>3.4 – 3.5 The Green Belt Assessment methodology was developed by consultants Arup with regard to national policy, guidance and the approach taken by other planning authorities. The methodology is considered to provide a robust and logical process for assessing the performance of Green Belt within the context of Spelthorne.</p> <p>3.6 Consultants Arup undertook a technical assessment of Green Belt performance in the Borough, as they have done for many other neighbouring boroughs and districts. The Bugle Nurseries site was assessed against the five Green Belt purposes as set out in the NPPF. The site was deemed to play an important role in separating the wider Sunbury built up area from Upper Halliford. Whilst the assessment did acknowledge the level of built form on the site which creates a semi-urban character, the important role it plays in preventing the merging of settlements was deemed to result in a strongly performing parcel.</p> <p>We have not included sites that are strongly or moderately performing Green Belt in order to protect that designated land that contributes to the Green Belt function. The council decided to focus its spatial strategy on weakly performing Green Belt and on maximising densities in suitable urban locations.</p> <p>To ensure that no stone has been left unturned we will give further consideration to previously developed land and those newly promoted to us as we develop the next iteration of the Local Plan.</p> <p>3.7 – 3.8 Green Belt parcels have been assessed through the Green Belt Assessment using a technical approach that focuses on the five NPPF</p>

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		<p>purposes and its strategic role. If any sites are built upon unlawfully then enforcement action would be pursued. Exceptional circumstances are needed to justify Green Belt release therefore the Council would need to carefully consider if these exist as well as the function of any existing Green Belt before coming to conclusions. This can only take place through the Local Plan.</p> <p>3.9 The Green Belt Assessment Stage 1 assessed larger Local Areas whilst the Stage 2 Assessment then looked at smaller sub areas. This is a more refined and focussed assessment to complement the conclusions formed in the Stage 1 assessment, and to ensure that the Council has made every effort to identify appropriate land to meet identified needs. The Stage 1 assessment identified several areas for further consideration at stage 2. This includes a number of areas that were later identified as weakly performing through GBA2. The Stage 2 assessment identifies defensible boundaries and assesses the performance of each sub area against Green Belt purposes. It also considers how release could potentially impact upon the integrity of the wider Green Belt and surrounding parcels. The parcels identified as weakly performing at stage 2 are considered to be less important to the wider Green Belt.</p>
4. Environment	<p>4.1 Negative impacts on wildlife and biodiversity.</p> <p>4.2 Weakly performing land sits within the SPA buffer for the reservoirs.</p> <p>4.3 Green Belt plays an important role in Climate Change.</p>	<p>4.1 – 4.2 The Sustainability Appraisal for the Local Plan Preferred Options sets out where negative impacts are expected on biodiversity. This will need to be considered in more detail at the planning application stage to show how adverse impacts can be mitigated to an acceptable level.</p> <p>Our new draft policy 'E4: Green and Blue Infrastructure' seeks to make a positive contribution to biodiversity and seeks a net gain in biodiversity. Biodiversity net-gain is an approach which aims to leave the natural environment in a measurably better state than beforehand. This approach has been included as part of the Government's Draft Environmental (Principles and Governance) Bill 2018. Biodiversity net gain will be sought on sites where existing green assets can be improved or enhanced or</p>

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	<p>4.4 Pollution and air quality impacts.</p> <p>4.5 Loss of flood land.</p>	<p>where these are lost, such as on greenfield sites, proposed development will provide significant replacements.</p> <p>We will be updating the Spelthorne Biodiversity Action Plan this year which will set out Spelthorne's commitment to conserve and enhance biodiversity. It will contain actions to improve habitats and species in the Borough. This will also help us to improve the proportion of local sites with positive conservation management.</p> <p>Any developments that are close to (or within) the boundary of a Special Protection Area may require a Habitat Regulations Assessment (HRA) if they are likely to have an adverse effect on the site. An initial screening stage would be required, followed by an Appropriate Assessment through the Local Plan process. Where it is considered that an adverse effect on the integrity of the site is likely, and no alternatives are available, the project can only go ahead if there are imperative reasons of over-riding public interest and if the appropriate compensatory measures can be secured. The HRA will be undertaken at the next stage of the Local Plan as the allocations are firmed up.</p> <p>4.3 Climate change must be a consideration that runs through the Local Plan so whilst we don't have a Climate Change policy specifically, our Plan when read as a whole seeks to positively address Climate Change, for example through addressing flood risk, improved biodiversity, sustainable construction and the creation of sustainable places. Draft 'Policy DS2: Sustainable Design and Renewable/Low Carbon Energy Generation' can be considered one of the more practical policies in terms of addressing Climate Change, however all policies were assessed against the Climate Change objective as set out in the Sustainability Appraisal framework in order to ensure that the most sustainable option was chosen and adverse impacts can be mitigated. All potential allocation sites were also assessed against the SA framework to consider any adverse impacts on Climate</p>

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		<p>Change. It is the role of the SA to highlight these and identify where improvements can be made to reduce these impacts.</p> <p>4.4 The whole of Spelthorne is an Air Quality Management Area and this is an important issue for the Local Plan to address. Individual site assessments for the proposed allocations have considered the effects of air pollution, especially in those locations where levels are already high. We have carried out a Sustainability Appraisal for all sites to assess the social, economic and environmental impacts of development, including on pollution and air quality. Part of this process is to identify where development could have a negative impact on any of the SA objectives and to subsequently identify mitigation measures. The detailed officer assessment sets out the reasons behind the identification of the site. We will also continue to work proactively with Surrey County Council who are responsible for transport through the development of the Local Plan to ensure that these matters are suitably considered and addressed on each site. We will also continue to work with our Environmental health team who monitor pollution via diffusion tubes on a monthly basis around the Borough.</p> <p>At the planning application stage applicants will need to adhere to all of the Local Plan policies, including draft policy E3: Environmental Protection. This sets out the steps that applicants will need to follow in order to improve air quality. Applicants will also need to submit an Air Quality Assessment which will assess air quality associated with transport volumes, waste disposal, construction etc. This will then give us a greater level of understanding with regards to the impacts of the proposed scheme.</p> <p>4.5 Officers have assessed every site put forward to us as available for development, covering issues and constraints such as the performance against Green Belt purposes and flood risk amongst others.</p>

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		<p>Spelthorne is a very constrained Borough therefore we have to look at land in flood zone 2 and 3a. We will be working with Surrey County Council as the lead local flood authority and we will be producing a strategic flood risk assessment stage 2 to help overcome flood risk on specific allocation sites.</p> <p>Our consultants, AECOM, have produced a draft interim Strategic Flood Risk Assessment stage 1 to assess flood risk in the Borough and we will also require each individual site to produce a detailed flood risk assessment and any mitigation measures to overcome adverse impacts in relation to flooding. Environment Agency mapping will also help to inform decision-making in relation to sites which are considered to be vulnerable to flooding.</p> <p>Suitable mitigation will be required before planning permission can be granted on each site. The applicant will need to provide a flood risk assessment as part of the process.</p>
5. Visual Impacts	<p>5.1 Impacts on character.</p> <p>5.2 Loss of outlook.</p> <p>5.3 Loss of view of open green land from nearby school.</p> <p>5.4 Negative impacts on landscape.</p>	<p>5.1 We would expect any new development to be of high quality design and this will be informed by the new Local Plan policies. The planning application stage of the process which comes after the adoption of the Local Plan will consider character in more detail.</p> <p>We are required to build over 600 homes per annum by Government therefore we are likely to see an increase in built form across the Borough. We aim to maximise densities where character allows, for example in high density areas like town centres and near to transport hubs, but we will seek to ensure that new developments across the wider area adhere to local character. Applicants will need to demonstrate that this has been taken into account through their planning application.</p> <p>5.2 – 5.3 The officer site assessments considered visual amenity impacts from public viewpoints to consider how outlook could potentially be impacted by development. It should however be noted that there is no 'right to a view' and a loss of a view is not a material planning consideration. The assessment of visual amenity is not an absolute</p>

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		<p>constraint and while due regard has been given to visual impact it has been weighed against other assessment criteria in order to identify potential development sites. We have also sought to take this into account to help mitigate adverse impacts as much as possible.</p> <p>Whilst the planning system cannot protect the view from a property, outlook is considered to be an important consideration. This occurs where development would have an adverse overbearing effect. This matter would be considered at the planning application stage.</p> <p>5.4 The Green Belt Assessment focussed on the five Green Belt purposes as set out in the NPPF as well as the strategic contribution of sites. The criteria utilised by Arup for purpose 3, which is 'to assist in safeguarding the countryside from encroachment', included a qualitative consideration of character, covering landscape. Where sites are considered to have a more urban character and have a higher percentage of built form they were considered to make less of a contribution to this purpose. Openness, which is a key characteristic of Green Belt, does not however necessarily relate to landscape character, with openness being concerned about the absence of built development and other dominant urban influences. Impacts on local character will need to be considered in detail at the planning application stage.</p>
6. Exceptional Circumstances	<p>6.1 There are no exceptional circumstances in Spelthorne.</p> <p>6.2 There are exceptional circumstances in Spelthorne (for housing and employment).</p> <p>6.3 A buffer is needed for the delivery of sites in the Green</p>	<p>6.1 – 6.2 Paragraph 136 of the NPPF states that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. Paragraph 137 also requires a local planning authority to demonstrate that it has examined all other options for meeting its need for development. Before finalising the Local Plan allocations, Spelthorne will continue to engage with neighbouring authorities and will reconsider urban sites and the maximisation of densities to ensure that it has fully exhausted all options to meet its need. This will be a key consideration by the Planning Inspectorate at the examination stage. National policy does not define 'exceptional circumstances' therefore it is up to the local planning authority to define this. The inability of local</p>

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	<p>Belt and this counts as exceptional circumstances.</p> <p>6.4 The Local Plan should explicitly set out the exceptional circumstances that apply to Spelthorne.</p>	<p>planning authorities to accommodate their housing requirements without introducing development in the green belt has been the key factor behind a large number of Green Belt changes justified to date.</p> <p>The Preferred Options consultation set out the potential sites that could help meet our housing need based on the information available at the time of production, however we will review our spatial strategy in light of the representations received to the consultation in due course to fully consider our approach moving forward to ensure that it is appropriate for us. Further Sustainability Appraisal work will be undertaken as necessary as the preparation of the Local Plan progresses to ensure that all reasonable options have been assessed.</p> <p>6.3 The Council will review its land supply position as the Local Plan develops.</p> <p>6.4 The Council will review its spatial strategy following the Preferred Options consultation to ensure that the representations received have been fully considered. The Council will produce the required supporting evidence alongside its next consultation to justify why the chosen spatial strategy has been pursued.</p>
7. Green Belt designation	<p>7.1 Reservoirs shouldn't be included in Green Belt as they can't be built on.</p> <p>7.2 Reservoirs aren't publicly accessible so shouldn't be included.</p> <p>7.3 Much of the land designated as Green Belt is already developed or has planning permission e.g. Shepperton Studios expansion. This</p>	<p>7.1 - 7.2 The Reservoirs and River Thames are part of the Green Belt as they contribute to the fundamental aim of Green Belt to prevent urban sprawl and keep land permanently open.</p> <p>They contribute to the maintenance of the open landscape and the wider strategic role of Green Belt. There is not necessarily a right of access on Green Belt. The NPPF does however indicate that "Where it has been concluded that it is necessary to release Green Belt land for development, plans should...set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land" (para. 138). If Green Belt land is taken forward through the Local Plan the Council would seek improvements and accessibility gains to remaining Green Belt.</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	should be discounted from Green Belt calculations.	7.3 The issue is noted by officers and the LPTG to consider further. The Council is aware of this and aims to develop mapping to indicate what land is 'available' for development as we refine our spatial strategy moving forward. This will take account of existing development, planning consents, waterbodies etc.
8. Social impacts	<p>8.1 Impacts on health and wellbeing.</p> <p>8.2 Loss of community spirit if Green Belt is lost.</p> <p>8.3 Loss of access to green spaces.</p>	<p>8.1 – 8.3 NPPF paragraph 138 indicates that “Where it has been concluded that it is necessary to release Green Belt land for development, plans should...set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land”. If Green Belt land is taken forward through the Local Plan the Council would seek improvements and accessibility gains to remaining Green Belt.</p> <p>The Sustainability Appraisal has assessed all sites against the SA framework, which includes health and wellbeing impacts. The SA allows the Council to consider the expected social, economic and environmental impacts of development and as a result adverse impacts can be mitigated. Larger schemes will be expected to produce a health impact assessment when a planning application is submitted. This is a useful tool to assess and address the impacts of development proposals. This will ensure that health and wellbeing are properly considered in proposals.</p>
9. Strategy	<p>9.1 Compensatory improvements are required if Green Belt is released.</p> <p>9.2 Weakly performing Green Belt should be improved not released.</p>	9.1 NPPF paragraph 138 indicates that “Where it has been concluded that it is necessary to release Green Belt land for development, plans should...set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land”. If Green Belt land is taken forward through the Local Plan the Council would seek improvements and accessibility gains to remaining Green Belt.

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	<p>9.3 Choosing Green Belt sites is profit driven.</p> <p>9.4 Green Belt should be released last in the plan period to take account of any possible reductions in housing need. It should be a last resort.</p> <p>9.5 More Green Belt should be identified for release, rather than add to existing sites.</p>	<p>9.2 – 9.3 Through the examination of the Local Plan the Council will be expected to demonstrate that it has left no stone unturned in meeting its housing needs. At present Spelthorne is unable to meet all its housing needs within the urban area alone therefore a strategy including weakly performing Green Belt has been considered as the preferred option. Moving forward we will take account of the representations received to our consultation to further develop our strategy. We will continue to review the proposed allocations as well as supporting evidence before concluding on our allocation sites.</p> <p>9.4 The Local Plan would include each allocation and a set of requirements expected to be delivered alongside these. This will also include a prospective timeframe for delivery. We are currently reviewing our spatial strategy following the consultation to consider how needs can best be met within the urban area whilst also ensuring we exhaust all other options before giving further attention to Green Belt land.</p> <p>9.5 The preferred spatial strategy has focussed on weakly performing Green Belt, maximising densities in the urban area and the development of Staines town centre. Green Belt sites have been chosen based on their sustainability and weak Green Belt performance, with sites situated at the edge of the urban area owing to these factors. These are therefore considered to be most suitable based on the preferred spatial strategy but we will review all allocations and consider any newly promoted sites as we further develop our Local Plan strategy.</p>

Housing

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
1. Housing requirement	<p>1.1 2016-based household growth projections should be used, not 2014 based projections.</p> <p>1.2 The Government-imposed housing figures should be challenged.</p> <p>1.3 The housing figures are not a compulsory target/ Local Housing Need is a starting point.</p> <p>1.4 The Council should employ its own housing need methodology.</p> <p>1.5 The 603 figure is not a target until the Local Plan is adopted.</p> <p>1.6 The baseline for housing provision should be based on housing growth between 2020 – 2030.</p> <p>1.7 How is birth rate/death rate likely to change with the increase in housing need?</p>	<p>1.1 At present 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 a response, we have to move forward with the Local Plan process and identify sites for potential allocation. If we used the lower figure based on the 2016-based projections we are likely to face opposition from Government and neighbouring authorities for not trying to meet our housing need in line with current guidance.</p> <p>1.2 We initially objected to the proposed approach to use 2014-based household growth projections when the Government consulted on the proposals.</p> <p>Local politicians and officers met with the Ministry of Homes, Communities and Local Government on 5 November 2019 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. We have chased MHCLG for a formal response to our letter. The methodology used for the 2014 projections and for 2016 were different, with the Government indicating that this played a role in the difference in expected household growth. Ultimately it is for MHCLG as to which projections they base their standard method on and whether they allow local authorities to use any figures other than the 2014-based method. The Government has an aim of delivering 300,000 new homes each year and any methodological changes are likely to reflect this aspiration.</p> <p>1.3 National Planning Practice Guidance sets out that the standard method to calculate housing need identifies the minimum annual housing figure, meaning we need to provide at least this number. This is an unconstrained assessment of need and guidance sets out that constraints should be considered when identifying land supply. In line with national guidance we would need to set out a strong reason for restricting the level of</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	1.8 Will homes be for those outside the Borough?	<p>development (NPPF para 11bi). This is considered to be a high bar and we would need to demonstrate the unique circumstances for Spelthorne whilst setting out that we have done all we can to meet as much need as possible.</p> <p>1.4 National guidance sets out that if it is felt that circumstances warrant an alternative approach a different methodology can be used but authorities can expect this to be scrutinised more closely at examination. There is an expectation that the standard method will be used and that any other method will be used only in exceptional circumstances. Our Strategic Housing Market Assessment 2015 identified a need of between 552-757 dwellings per annum so we could expect a need in this region if an alternative approach was pursued.</p> <p>1.5 The PPG sets out that where a Local Plan is more than five years old the standard method should be used to calculate local housing need. This should be calculated at the start of the plan-making process and should be kept under review and revised where appropriate. This means that we need to work towards the LHN figure throughout the plan making process and we can rely on our local plan figure for two years once adopted.</p> <p>1.6 The issue is noted by officers and the LPTG to consider further. The LHN has now been updated with 2020 as the baseline following the consultation. The need is now 606 homes per annum.</p> <p>1.7 – 1.8 The Local Housing Need figures derived from the standard method use household growth projections as their basis. The household growth projections are based on demographic trends in population and household formation. They in turn use the subnational population projections as their base which indicate the future size and age structure of the population, applying local fertility and mortality rates to calculate the number of projected births and deaths. This is then adjusted for migration</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
		into and out of each local authority. This is the same across the country so that all authorities account for these elements of population change.
2. Level of development	<p>2.1 Spelthorne is full/overcrowding.</p> <p>2.2 Too much housing is being proposed.</p> <p>2.3 A decision on the Local Plan should not be made until the Government reduces Spelthorne's housing number.</p> <p>2.4 We don't need the proposed number of dwellings based on population growth and average household sizes.</p> <p>2.5 The South East is already heavily populated and constrained – has this been taken into account?</p> <p>2.6 Development levels should be capped in line with brownfield land availability.</p>	<p>2.1 – 2.2 The level of housing required is based on population projections to enable enough housing to be built to meet the needs of the Borough. This takes account of future growth as well as constrained households that have not been able to form due to affordability issues in the past. Transport modelling, an Infrastructure Delivery Plan and a Strategic Land Availability Assessment amongst other supporting evidence will inform which sites we allocate and how much housing can be accommodated in Spelthorne to meet needs.</p> <p>2.3 The Government says we will need to produce a plan that meets our needs and if we don't we will be at risk of our local plan being found unsound by the Government appointed Planning Inspectorate. If we fail to make progress on the plan 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 be involved in the process to provide a plan which delivers homes and employment areas that we need in the most suitable places.</p> <p>2.4 The standard method for calculating housing need uses household growth projections as its first step, which in turn use subnational population projections. The subnational population projections indicate the future size and age structure of the population, applying local fertility and mortality rates to calculate the number of projected births and deaths, and then adjust for migration into and out of each local authority. Given that population projections form the basis of the standard method calculation it intends to meet population need. National guidance requires us to use 2014-based household projections rather than the more recent 2016-based projections. Spelthorne Borough Council has challenged the Government on this and are awaiting a response.</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
		<p>2.5 The standard method provides an unconstrained assessment of homes needed in an area. Planning Practice Guidance sets out that this is the first step in the process of deciding how many homes need to be planned for. Plan makers should consider constraints when identifying sites to meet needs. The PPG sets out that if there is clear evidence that strategic policies cannot meet the needs of the area, factoring in the constraints, it will be important to establish how needs might be met in adjoining areas, particularly through the Duty to Cooperate.</p> <p>2.6 The Strategic Land Availability Assessment (SLAA) assesses the suitability, availability and achievability of sites to meet development needs. The SLAA takes account of local constraints, such as Green Belt, in assessing the suitability of land. This sets out all developable land in the Borough and focusses on brownfield land. Spelthorne cannot currently meet its objectively assessed housing need in the urban area alone. The NPPF at paragraph 136 sets out that Green Belt boundaries should only be altered where exceptional circumstances exist. Before this is concluded, plan makers should demonstrate that they have examined fully all other reasonable options for meeting the identified need for development. As such, Spelthorne will need to set how it has fully explored all other options for meeting its needs before determining if Green Belt should be released.</p>
3. Deliverability & Housing supply	<p>3.1 The housing supply position has deliverability issues.</p> <p>3.2 Delivering 603 homes each year is unrealistic.</p> <p>3.3 Why do we need more housing when existing schemes have paused/stopped?</p>	<p>3.1 As the Local Plan progresses we will engage further with landowners to confirm the availability and deliverability of sites. We are aware that the position may change throughout the course of plan preparation and we will update our land supply position accordingly. Given the constraints present in Spelthorne we realise the importance of leaving no stone unturned and maximising supply from a variety of sources, in line with our preferred spatial strategy.</p> <p>3.2 The issue is noted by officers and the LPTG to consider further. The Council is aware that current net completions fall below this target. It is for</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	<p>3.4 Due to historic under delivery SBC should factor in an appropriate buffer/ contingency plan so it meets its need.</p> <p>3.5 Empty homes and offices should be used.</p> <p>3.6 Why doesn't privately developed housing count?</p> <p>3.7 The Core Strategy runs to 2026 and net completions already go beyond the 166 target.</p>	<p>the Local Plan to identify a sufficient supply of sites to meet needs and to boost deliverability. The Council has challenged Central Government on the use of outdated population projections to inform housing need and is awaiting a response.</p> <p>3.3 The Local Plan will cover a 15 year period and we need to identify enough sites to meet local housing needs throughout this time. In addition, we are not currently meeting our housing needs, with net completions falling below the annual requirement. The Local Plan provides the opportunity to identify a sufficient supply of sites to meet needs. A Housing Delivery Test Action Plan has been produced by the Council to identify measures to boost housing delivery, including the completion of those schemes under construction. Developers have been contacted as part of this process to ascertain the reasons for any slowdown in progress.</p> <p>3.4 The standard method for calculating housing need includes an affordability adjustment to account for past under-delivery. As such there is not a requirement to specifically address under-delivery separately. In terms of the delivery of identified sites throughout the plan period, the Council will apply an appropriate buffer to its five year land supply position. The SLAA also contains a buffer to account for non-implementation which will be carried through to the Local Plan supply of sites.</p> <p>3.5 There are 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's housing department have produced a Homelessness Strategy which considers how best to deal with empty homes in the Borough. This is an important issue which the Council are seeking to address and looking to develop a means by which these homes can be brought back into use</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
		<p>as a means of meeting either a specific need for housing requirements more generally.</p> <p>In terms of the Local Plan, the Council's preferred spatial strategy focuses on the use of available brownfield land. The Strategic Land Availability Assessment (SLAA) supports the Local Plan and identifies potential development sites in the urban area. This assesses the suitability, availability and achievability of sites. Offices and vacant buildings able to accommodate 5+ units have been considered in the assessment. Smaller sites have been picked up as 'windfall', whereby an allowance is made for smaller sites based on past trends.</p> <p>3.6 Privately developed housing as well as that developed by the Council and other public bodies does count in housing supply figures.</p> <p>3.7 National guidance sets out that where a development plan is more than five years old, the standard method should be used to calculate Local Housing Need (NPPF, para 73). As such, the Core Strategy 2009 housing figure is out of date and should not be relied on.</p>
4. Affordable housing	<p>4.1 More affordable housing should be provided.</p> <p>4.2 Viability work is important for affordable housing provision.</p> <p>4.3 There are too many loopholes for developers to avoid affordable housing provision.</p> <p>4.4 H2 policy should be amended to recognise those</p>	<p>4.1 – 4.3 The Local Plan will be viability tested so that policies are viable and an appropriate level of affordable housing can be provided. National guidance sets out that the role for viability assessment is primarily at the plan making stage and policies should not undermine the deliverability of the plan. By considering viability at the plan making stage, there is less to be negotiated at the planning application stage, with affordable housing levels already set at a viable level. The viability assessment will test different levels of affordable housing provision across a number of site typologies so that the policy sets affordable housing requirements at an appropriate level.</p> <p>Spelthorne Borough Council owns a number of sites identified for allocation in the Local Plan. These provide an opportunity to increase</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	<p>schemes that are exempt from affordable housing requirements.</p> <p>4.5 Need to distinguish between Green Belt and urban land in affordable housing provision</p>	<p>affordable housing provision beyond the levels required in the Local Plan policy.</p> <p>4.4 The issue is noted for officers and the LPTG to consider further. The Local Plan should avoid repeating national policy, with this information available in the NPPF.</p> <p>4.5 The issue is noted for officers and the LPTG to consider further. The viability assessment will test a variety of site typologies, including Green Belt and urban sites. This will help the Council to ascertain if viability differs across these sites and whether a higher level of affordable housing provision can be requested. Typically greenfield sites have fewer deliverability constraints therefore it is likely to be more viable to include a higher proportion of affordable units. This will be a key consideration in producing allocation policies.</p>
5. Duty to Cooperate	<p>5.1 Spelthorne will need to consider unmet need of neighbouring authorities.</p> <p>5.2 Support for Spelthorne planning to meet its own needs.</p>	<p>5.1 – 5.2 The issue is noted by officers and the LPTG to consider further. Spelthorne is a very constrained borough like many of its neighbouring authorities. Spelthorne faces the challenge of meeting its own development needs within this environment and does not have surplus land to unmet need of neighbouring authorities but is committed to ongoing and constructive cooperation with partners regarding strategic matters. Our evidence base so far The aim of this is to tackle the issues faced across the wider region.</p>
6. Housing Mix	<p>6.1 The market will change over the plan period so flexibility is required.</p> <p>6.2 Individual site circumstances need to be considered in housing mix.</p>	<p>6.1 - 6.2 The issue is noted by officers and the LPTG to consider further. Draft policy H1: Homes for All sets out that housing mix should be informed by the Strategic Housing Market Assessment or any similar evidence. This will allow the most recent evidence to be taken into account and for needs to be met through new developments.</p> <p>6.3 Draft Policy H1 sets out that specialist accommodation will be required on suitable sites. The Strategic Housing Market Assessment provides an</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	<p>6.3 Need for more specialist accommodation/accessible homes.</p> <p>6.4 Houseboat need should be fully assessed.</p>	<p>assessment of specialist accommodation and elderly people's accommodation. This evidence has fed into the development of the Local Plan policy.</p> <p>6.4 The assessment of needs is considered to address housing needs across Spelthorne.</p>
7. Site Specific Issues	<p>7.1 Why is the Elmsleigh Shopping Centre being demolished and redeveloped for housing?</p> <p>7.2 Too much development is proposed on HS1/010 (Stratton Road site).</p> <p>7.3 Why is housing proposed on RL1/007 (Worple Road site) when mineral workings have previously been identified?</p> <p>7.4 The Northumberland Close site (SN1/005) should be considered for housing rather than employment use.</p> <p>7.5 AS1/003 (Staines Fire Station) is used by Ambulance services.</p>	<p>7.1 The Council is considering redeveloping the Elmsleigh Centre so that it would retain its retail presence within the town centre, however residential development could be provided on the upper floors, above the shopping centre. The Staines Masterplan will set out how this could best be accommodated.</p> <p>7.2 Officers previously produced a Site Selection Methodology setting out a robust set of criteria to assess potential development sites. We consulted on this publicly last year and amended it to reflect feedback. The assessment process used evidence base studies and also considered constraints for example flood risk, land contamination, designated nature sites, to assess sites. The spatial strategy also guided the assessment of sites and we undertook a Sustainability Appraisal to assess the social, economic and environmental impacts of developing the sites. Bringing all of these factors together we weighed up the benefits and harm of each site to produce a list of potential allocations. Through each site assessment officers have provided an approximate yield considered to be appropriate on each site. This is based on the character of the wider area and density considerations.</p> <p>7.3 Gravel extraction at the Manor Farm site has not yet commenced although Bretts have continued preparatory work to comply with a number of planning conditions. They have indicated that they would complete extraction and restoration within the next 2-3 years. The proposed allocation site at Worple Road (Ref RL1/007) is land which adjoins and overlaps to a limited extent with the gravel extraction site to the south. The</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
		<p>Worple Road site was put forward by Bretts for residential development as it is mainly unaffected by the mineral working operation.</p> <p>The boundary shown in the site allocations document is that submitted by Bretts in proposing the site for housing. There is some overlap between the two sites and it will be for Bretts to decide whether they wish to amend their planning permission to exclude the land they propose for housing development or to adjust the boundary of the area they have put forward for housing development so that it coincides with that shown in the minerals permission.</p> <p>7.4 The site was also promoted for economic development by the landowner and the site was identified for commercial use to support growth at Heathrow Airport through the officer site assessment process. The area around Northumberland Close is characterised by a number of large storage and distribution units which play an important economic role for Spelthorne in supporting the operation of Heathrow Airport. For this reason the site is considered to be more appropriate for commercial use.</p> <p>7.5 The landowner has indicated that the site is available following the relocation of the fire station. The Council will continue to work with service providers to ensure that operations can continue from a suitable location. Allocation of the site is dependent upon availability.</p>

Gypsies and Travellers

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
1. Assessment process	<p>1.1 Little consideration gone into the location of new pitches. Existing sites should be expanded but this has not been considered.</p> <p>1.2 Policy criteria do not seem to have been taken into consideration when allocating the site west of Town Lane, Stanwell and there seems to be little evidence supporting the sites' allocation for this use.</p> <p>1.3 I fail to see why this population should be treated any differently to anyone else regarding housing need.</p>	<p>1.1 Officers undertook detailed assessments of a large number of sites whilst preparing the Draft Local Plan. These are available on our evidence base please refer to the Preferred Site Allocations - Officer Site Assessments and Rejected Site Allocations - Officer Site Assessments Both of which can be found on www.spelthorne.gov.uk/New-Local-Plan-Evidence For more information on which sites were assessed. Every site which was assessed was considered for its suitability for a Gypsy and Traveller or Travelling Showpeople site.</p> <p>1.2 The expansion of existing sites is an option however the good practice guidance on site design states that there should be no more than 15 pitches per site (please refer to the guide under Documents titled good practice guidance). In addition, some of the existing sites lie within flood zones and it would be contrary to national planning policy to allow them to expand. Officers will produce a note and publish on the website with analysis of each site.</p> <p>1.3 The Council is following the guidance provided by national government to provide homes for both the settled population and Gypsies, Travellers and Travelling Showpeople. We have identified sites suitable to meet the specific needs of this community group in line with guidance.</p>
2. Offsite provision	<p>2.1 Policy H3 on offsite provision - this is referring to sites that have been allocated as GTTS pitches by the Council in the Local Plan, but that have proven to be undeliverable and therefore</p>	<p>Some of the larger site allocations may be required to provide some on-site gypsy and traveller pitches as part of the wider allocation. If this is set out in the allocation and later the developer is not able to deliver these, this part of the policy would apply. If sites are allocated entirely for gypsy and traveller pitches they would be expected to deliver these. There are a limited number of sites where it is possible to deliver pitches and it is important that identified needs are met.</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	are being developed for other uses. If this is the case, it seems unfair that the Council are placing the onus on the developer to locate a new GTTS, when this should be the responsibility of the Council.	
3. Green Belt	3.1 Why will land allocated for GTTS use be removed from the Green Belt?	2.1 In order for the land to be allocated for development it must be removed from the Green Belt. Please see the 'Green Belt' key theme and policy for further details.
4. Impacts of use	<p>4.1 Negative impacts on sewerage.</p> <p>4.2 Parking issues.</p> <p>4.3 Creation and maintenance of GTTS sites will be an additional financial burden on already stretched budgets. It could prove to be a very costly mistake if gypsies refuse to move to these sites.</p> <p>4.4 Concerns over site management and security.</p>	<p>4.1 As the organisation responsible for sewerage in the borough, Thames Water are a specific consultation body and are consulted at each stage of Plan preparation to ensure they have no objections to sites or the overall number of homes allocated in the Local Plan.</p> <p>4.2 Please see the 'Transport' key theme for a detailed response.</p> <p>4.3 The purpose of the consultation was to engage all sectors of the community and find out their views on the Draft Local Plan policies and sites.</p> <p>4.4 Sites may be managed privately or by Surrey County Council. Site Management is not something that has been considered in detail at this stage of Local Plan production.</p>
5. GTTS needs	5.1 The identified need for Gypsy and Traveller pitches in Spelthorne is stated in this	5.1 The Council's GTAA has been produced by ORS (Opinion research Services). They have undertaken studies for most other Surrey authorities and a large number of other authorities. They have a robust methodology

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	<p>documents for only 3 pitches. What is more, this need is not required all at once and is recommended to be spread over the next 25-year period, i.e. 1 site every 7 or 8 years.</p> <p>5.2 The requirement for G&T accommodation should be continuously monitored, to determine if the number of sites allocated in the Local Plan is reflective of the need. Factors such as plots vacated by households moving away from the study area; households on unauthorised developments; and concealed households/doubling-up/over-crowding, could impact the accuracy of need.</p> <p>5.3 The needs and wants of the community have not been considered. A significant amount of research is required by the Council to make this work.</p> <p>5.4 G&T communities have not been consulted/interviewed</p>	<p>that has been accepted at many planning examinations and have addressed the issues highlighted. Their report identifies the needs for Gypsy and Traveller pitches for those who both do and no not meet the planning definition.</p> <p>5.2 The GTAA (Gypsy and Traveller Accommodation Assessment 2018) was produced by Opinion Research Services (ORS). They are very experienced and have produced similar evidence for many other local authorities across Surrey and nationwide. They have taken into account factors such as concealed households/doubling up and household formation rates. All parts of the evidence base will be updated as required to ensure it remains up to date and reflects need.</p> <p>5.3 and 5.4 The Local Plan evidence base and information provided by central government identifies the development needs of Spelthorne Borough. For example the overall housing need figure is calculated for us, the GTAA identifies the needs for Gypsy, Traveller and Travelling Showpeople pitches and the Employment Land Needs Assessment identifies needs for employment land.</p> <p>The purpose of the consultation was to engage all sectors of the community and find out their views on the Draft Local Plan policies and sites. No sector of the community was consulted prior to the start of the consultation on 5 November.</p> <p>5.5 The GTAA has been produced by consultants ORS. The GTAA covers 2017 to 2041 in 5 year time-periods whilst the Local Plan will cover to 2035 (however this may be extended). There is an identified need of zero for Gypsy and Traveller households who meet the definition 2037-2041 so the differing time periods are not relevant. There is an identified need of 1 plot for Travelling Showpeople households who meet the definition 2037-2041 so the need is 14 rather than 15. However over the Plan preparation timetable this may change.</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	<p>to determine their preferred site or whether they will actually move to proposed sites. More research is needed about where these communities want to live.</p> <p>5.5 Query over the time period for need as shown in the evidence compared with the Local Plan period. The number of Travelling Showpeople plots required could therefore reflect that assessed in the GTAA when assessed on a consistent timeframe. The overall need for travelling showpeople plots within the plan period would then be reduced by 1 to 2 potential plots.</p>	<p>Of those not meeting the definition and the unknown there are 2 of the 17 "households in 2037-41.</p>
6. Occupation of sites	<p>6.1 Is there a restriction on how long families can stay on a pitch for?</p> <p>6.2 Why do transient populations require permanent sites?</p> <p>6.3 Will the sites be big enough to accommodate the average</p>	<p>6.1 The pitches being provided in the plan will be permanent. Each pitch will accommodate one household. A pitch is an area normally occupied by one household, which typically contains enough space for one or two caravans but can vary in size. A site is a collection of pitches which form a development exclusively for Gypsies and Travellers. For Travelling Showpeople, the most common descriptions used are a plot for the space occupied by one household and a yard for a collection of plots which are typically exclusively occupied by Travelling Showpeople.</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	showman's vehicles and equipment?	<p>There is a need for a Surrey-wide transit pitch. We do not feel that Spelthorne is the best location in Surrey for this need to be met. We are on the edge of London, rather than centrally located. Surrey Leaders and Chief Executives are working together with Surrey Police to find a solution.</p> <p>6.2 Both the Gypsy and Traveller and Travelling Showpeople populations travel for work however they also need a home base for the winter period. This is when Travelling Showpeople maintain their machinery, for example. The Planning Policy definition of Gypsies and travellers includes: "Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily...".</p> <p>6.3 We will undertake further engagement with the Showman's Guild to ensure sites for Travelling Showpeople are a suitable size.</p>
7. Location issues	<p>7.1 Only 3 other sites have been considered for this use: LS1/001 Linton Place (already a site); LS1/016 Shepperton Road; and RL1/009 Waterside Nursery. In no way does this constitute a significant search of the borough for potential new sites.</p> <p>7.2 SN1/015 (Land west of Town Lane, Stanwell) is considered suitable for '5- 8 gypsy and traveller pitches',</p>	<p>7.1 Please refer to the Site Selection Methodology - February 2019 Preferred Site Allocations - Officer Site Assessments Rejected Site Allocations - Officer Site Assessments All of which can be found on www.spelthorne.gov.uk/New-Local-Plan-Evidence For more information on which sites were assessed.</p> <p>7.2 A Gypsy and Traveller or Travelling Showpeople site would have to show its design at planning application stage, including road layout and where the caravans and utility blocks would be sited. There is good practice guidance which provides suggested layouts. There will be hardstanding for the mobile homes to be placed on. In legislation mobile homes and caravans are synonymous and have a specific definition, so their maximum height and size will be known. Permanent Gypsy and</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	<p>however the assessment also states that 'A change to built form would be significant and mitigation would be required in terms of size, scale and design of any units.' Given the nature of many GTTS dwellings, there is usually limited control over their design and how they can assimilate into their surroundings.</p> <p>7.3 Why is there no provision for Travellers in Staines, Shepperton, Laleham & Charlton Village? Why are other areas of Surrey not being considered? What is the rationale with adding to already-overcrowded areas?</p>	<p>Traveller or Travelling Showpeople sites are very different from sites where incursions occur.</p> <p>7.3 It is very unlikely to be viable to develop sites for Gypsy, Traveller and Travelling Showpeople use in urban areas. These sites will have high land values as they can be used for homes, offices and other uses. In order to ensure the pitches and plots needed, which by their nature are low density, it is likely the sites will have to be allocated on green field sites. No green field sites have been identified in Staines. It is difficult to identify sites in Laleham due to flood risk issues.</p>

Health

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
1. Pressure on existing health infrastructure	<p>1.1 The Borough has not got the capacity in the doctor's surgeries needed to deal with any increase in population</p> <p>1.2 Unless the GP practice expands how are they going to deal with additional people as they are already overburdened</p> <p>1.3 No health facilities planned to accommodate the increased number of residents</p> <p>1.4 Difficult to get an appointment with the doctor or there is long wait for one</p> <p>1.5 The doctor's surgery is barely able to provide an adequate service to existing residents</p>	<p>1.1 The Council acknowledges that increased growth in the Borough will inevitably lead to increased pressures on services such as healthcare. 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.</p> <p>1.2 We are working with infrastructure providers, including healthcare, so they can plan for our future growth. Healthcare will be dealt with through the Infrastructure Delivery Plan (IDP) which will support the Local Plan. The IDP identifies the Borough's infrastructure requirements, 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 is currently being progressed following the Preferred Options consultation.</p> <p>1.3 The Clinical Commissioning Groups (CCG) are the bodies responsible for the provision of NHS hospitals and community healthcare facilities. The Council is working with the CCG to establish the demands on each of the current GP surgeries in the Borough and how the forecast increase will impact on this service. This will form part of the Infrastructure Delivery Plan (IDP) which will provide greater detail on the infrastructure required for the period of the Local Plan. There is funding available to help support this from contributions developers will pay when they build their sites.</p> <p>1.4 It is acknowledged that many residents struggle to get an appointment at their doctor's surgery. As part of the on-going work related to the IDP, the Council are engaging with GP surgeries across the Borough to ascertain where there is existing capacity that can be utilised and where there is a requirement to expand to provide further capacity for patients.</p> <p>1.5 As noted above, the Council are working with key healthcare stakeholders to ascertain current and future demand and work with those surgeries to help to meet the forecasted demand. However each doctor's</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
		surgery is run independently and concerns about the adequacy of care provided should be raised with either the practice itself or the CCG as the responsible body.
2. New facilities are required	<p>2.1 Provision of a new doctor's surgery in Charlton Village.</p> <p>2.2 There is only one GP surgery in Shepperton.</p> <p>2.3 New GP or upgrade existing GP at Studholme to prepare for inevitable increase in population.</p> <p>2.4 GP waitlists are already too long for Stanwell.</p>	<p>2.1 The Preferred Options consultation included draft site allocations in Charlton village which would see a substantial increase in the local population of the village and its surrounds. The Council are aware of the lack of healthcare provision available currently in the village and, should these draft site allocations be taken forward, then this is an issue that will need to be addressed. As part of the work for the IDP, those areas where additional pressures will be placed on infrastructure are to be identified. Developer's contributions from developments can be used to help fund additional infrastructure to deal with the growth generated by these developments.</p> <p>2.2 The issue is noted by officers and the LPTG to consider further. The Council are engaged in discussions with Shepperton Health Centre to establish their current capacity and future needs. As part of this we will also consider the scope for the expansion of facilities if this is required.</p> <p>2.3 The same as stated in 2.2 above applies to Studholme Medical Centre in Ashford as it does to all health centres and doctor's surgeries in the Borough.</p> <p>2.4. The issue is noted by officers and the LPTG to consider further. Please refer to 2.2 and 2.3 in the context of the health centres/doctor's surgeries in Stanwell.</p>
3. Lack of health infrastructure in the Plan	3.1 Plan does not mention issues such as GP surgeries and local hospital provision	3.1 The Preferred Options version of the Local Plan does not include specific reference to GP surgeries or other healthcare provision as this is a matter for the individual surgeries and for the CCG and NHS England. The Council are working constructively with all the parties involved in order

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	<p>3.2 Are the developers going to be made to build GP surgeries?</p> <p>3.3 Will this mean you will need to use more Green Belt land to provide new doctor's surgeries</p>	<p>to identify where additional capacity or facilities may be required in order to meet forecasted future demand for growth. Details of this will be included in the IDP which is being progressed currently.</p> <p>3.2 It is always possible that developers could propose to include facilities such as GP surgeries however this tends to be for substantial developments which are likely to increase the local population substantially. However where the cumulative impacts of a number of developments may see such an increase in a town or village, then new facilities may be deemed necessary. The draft site allocations in the Preferred Options are not yet finalised and further work is required. New developments contribute monies through the Community Infrastructure Levy (CIL) and section 106 agreements. This can be used to either secure funding for new facilities from the developers to mitigate the impacts of the development(s).</p> <p>3.3 The draft site allocations have identified a number of sites in the Green Belt which could be used for development either housing or for employment use. These sites however are on the edge of existing urban areas were the Council's Green Belt Assessment has identified that these sites are lower performing against the five purposes of Green Belt. GP surgeries would tend to be located within the urban areas to serve the wider catchment rather than included in the Green Belt, which can be more isolated from these urban areas. The expansion of existing health facilities would therefore not necessarily impact on the Green Belt.</p>

Education

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
1. Impacts on schools	<p>1.1 Local schools are oversubscribed</p> <p>1.2 Need for additional school places</p> <p>1.3 Concern over the lack of schools in general</p> <p>1.4 No schools in Charlton Village to support development</p> <p>1.5 Some children have to travel out of the Borough for their education</p> <p>1.6 Concerns for the safety of school children in the context of road safety</p>	<p>1.1 It is acknowledged that there are existing pressures on local schools in the Borough. The Council are working with Surrey County Council as the education authority and local schools in the Borough to ascertain the areas of greatest demand over the Local Plan period.</p> <p>1.2 As noted in 1.1 above, the council are working with the relevant education bodies to establish where capacity exists and where demand is likely to be greatest to ensure that sufficient school places are made available.</p> <p>1.3 Spelthorne has 33 schools (25 primary schools and 8 secondary schools). Whilst many of these are concentrated in the east and south of the Borough, most are accessible.</p> <p>1.4 Areas where development may substantially increase demand for school places will be considered for the likely impacts on existing facilities. By having a Local Plan in place, this allows the identification of areas where development will take place and demand will increase as a result. This then facilitates discussions with SCC to ensure that sufficient school places are available to accommodate this increase.</p> <p>1.5 Whilst reducing travel to school is an important strand of developing a sustainable Local Plan, there may be occasions where parents have specifically chosen for their child to go to a school outside the Borough or where the primary school has a link to a secondary school outside the Borough. It is acknowledged that there are limited secondary school options in the Staines-upon-Thames area which is why many pupils there may attend Magna Carta in Egham. We will continue to work with SCC and local schools on this issue as part of the Infrastructure Delivery Plan supporting the Local Plan.</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
		<p>1.6 Safety for schoolchildren is of paramount importance and has been more extensively covered in the Highway safety section of the officer transport response. There is a national focus on reducing school traffic and minimising vehicles parking close to schools during peak hours. The Council will continue to work with key stakeholders to identify particular areas where such restrictions can be put in place to increase the safety of schoolchildren.</p>
2. Requirement for school expansions	<p>2.1 School expansion will lead to more Green Belt being developed.</p> <p>2.2 New schools are not proposed in the Plan to account for the increasing population.</p> <p>2.3 Local school can only take a limited number of pupils with no potential to expand.</p>	<p>2.1 The draft site allocations have identified a number of sites in the Green Belt which could be used for development either housing or for employment use. These sites however are on the edge of existing urban areas where the Council's Green Belt Assessment has identified that these sites are lower performing against the five purposes of Green Belt. Most of the Borough's schools are located within urban areas to serve the wider catchment rather than in the Green Belt, which can be more isolated from these urban areas. This minimises the need for additional development in the GB to support school expansions. Some school playing fields are in the GB however these are protected under the National Planning Policy Framework (NPPF) which would limit their loss to development.</p> <p>2.2 There are no proposals to expand schools in the Local Plan currently. As part of the on-going work with the IDP, the Council are engaging with SCC and the Borough's schools to discuss opportunities for expansion and to identify where the most pressing need for school places is anticipated to be.</p> <p>2.3 refer to 2.2 above, on-going engagement with local schools and SCC</p>

Biodiversity

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
1. Impacts on wildlife	<p>1.1 Loss of important wildlife habitat</p> <p>1.2 Frequently see wildlife in the location</p> <p>1.3 There is a need to do all we can to protect existing wildlife habitats</p> <p>1.4 Concerns over wildlife and the long term impacts</p> <p>1.5 The local community will lose the opportunity to see wildlife</p> <p>1.6 Contradicts the Councils commitment to conserving and enhancing the biodiversity of the borough.</p>	<p>1.1 The Council acknowledges the importance of wildlife habitats. Spelthorne has a number of sites designated nationally and internationally for their role in supporting wildlife both in terms of birds on the reservoirs and grassed areas which are habitats for a huge variety of wildlife. The Council undertake regular surveys by specialist ecologists to ascertain the ecological value of areas of the Borough. Those areas of high value are protected as far as is possible and where some loss may take place, mitigation is provided to minimise loss of biodiversity.</p> <p>1.2 Spelthorne benefits from the large areas of open space which also provide opportunities for cow and horse grazing. Much of this land is privately owned and it is the decision of the landowner or the tenant to have such animals on the land. If required, these animals can be relocated to alternative sites. In the case of other wildlife, this will be protected as much as possible.</p> <p>1.3 The Council agrees that there is a need to protect existing habitats and supports the designated biodiversity sites. The regular surveying of these helps to keep an up-to-date record of the value of these areas in terms of ecology and the role they play in wider biodiversity functions. Designated sites are therefore not included for consideration as areas of development and where there may be an impact on habitats in other areas which don't have the designation, this can be reviewed or suitable mitigation employed to protect the wildlife and habitats as best can be.</p> <p>1.4 The Council acknowledges the concerns over wildlife. The government is mandating that all planning applications require a biodiversity net gain to be provided, especially in areas where development has an impact on biodiversity. This will ensure that developments provide additional or improved areas of biodiversity for the benefit of the local community. In respect of wildlife habitats, ecological assessments will need to be carried out to determine if the impacts can be</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
		<p>minimised or ideally avoided completely. Where this is not possible, suitable mitigation will be required to ensure there is no harm to these habitats and these may be re-provided in a more appropriate location.</p> <p>1.5 Spelthorne has two substantial areas which make up its Biodiversity Opportunity Areas (BOAs). This includes many designated biodiversity sites as well as opportunities for enhancement and public access. As part of the work on the Local Plan, a new Biodiversity Action Plan (BAP) is to be provided to identify key areas for enhancement and to allow opportunities for greater connections between local communities and these areas of biodiversity.</p> <p>1.6 The Council is committed to conserving and enhancing biodiversity in the Borough. Regular surveys are undertaken of the designated sites in the Borough to keep records updated regarding species habitats and the role sites play within the wider ecological network. The draft biodiversity policy in the new Local Plan clearly sets out this intention. The new Biodiversity Action Plan will set out how the Borough intends to enhance and protect areas of biodiversity.</p>
2. Impacts on trees	<p>2.1 Development of some of the sites will lead to the removal of trees</p> <p>2.2 A number of mature trees on some of the sites will be threatened</p> <p>2.3 The Council should be preserving and planting trees</p> <p>2.4 Many of the trees provide</p>	<p>2.1 Any trees impacted upon by a proposed development will be considered as part of the details of a planning application. If there are trees which may be removed and are of value/amenity, then the Council can place a Tree Preservation Order (TPO) on them to ensure these remain in place. Where trees may be lost, these can be replaced on site and developers will be encouraged to provide enhanced landscaping and biodiversity provision as part of the biodiversity net gain requirement as set out by Government.</p> <p>2.2 As stated above any trees that could be subject to removal or be impacted on by a proposed development will be assessed and there is a mechanism to protect them.</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	habitats for wildlife	<p>2.3 The Council intends to preserve existing trees where possible and will encourage the planting of new trees as part of on-going maintenance of the Borough's green spaces and other sites as well as on sites for new development.</p> <p>2.4 The Council does not propose removing trees and where this may need to be done to facilitate development, a detail tree assessment is required to be carried out. Where a tree is deemed to have public amenity and value, it can be protected as a TPO as referred to in 2.1 above.</p>
3. Impacts on waterbodies	<p>3.1 Reservoirs are a source of drinking water supply, any plans to overpopulate area will pose serious threat in maintaining water safety</p> <p>3.2 A 8-10 metre natural wildlife corridor should be sought along the rivers</p> <p>3.3 Should be more specific about the relevant Water Framework Directive (WFD) rivers and lakes so the objectives for improvement can be more detailed and tailored to each waterbody</p> <p>3.4 Consideration of impacts of high rise developments on</p>	<p>3.1 The Council are working with water providers as part of the Local Plan process and the Infrastructure Delivery Plan to ensure that forecasted demand is taken into account and that sufficient water supply remains.</p> <p>3.2 The issue is noted by officers and the LPTG for further consideration.</p> <p>3.3 The issue is noted by officers and the LPTG for further consideration.</p> <p>3.4 The issue is noted by officers and the LPTG for further consideration – impacts to be fully appraised as part of the Habitats Regulations Assessment to support the Local Plan.</p> <p>3.5 The issue is noted by officers and the LPTG for further consideration – The Council is engaging with water providers to ensure current and future supply.</p> <p>3.6 The Council carries out regular ecological surveys on sites of biodiversity. The reservoirs are designated as Special Protection Areas and form the South West London waterbodies network. In addition, there are a number of other waterbodies in the Borough which are relevant to</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	<p>the South West London Waterbodies (SWLWB)</p> <p>3.5 Consideration of on an up to date evidence base on the water environment and as such the relevant River Basin Management Plan.</p> <p>3.6 Water bodies provide a habitat for wildlife.</p> <p>3.7 Security issues for developments close to Thames water sites</p> <p>3.8 Development proposed alongside designated sites will impact on these.</p> <p>3.9 Explanation on the role that the setting of a watercourse plays, why it is valuable or justification as to why this should be protected</p> <p>3.10 Spelthorne has so many waterbodies within it, yet none have been taken into consideration in the Plan.</p>	<p>the functioning of this network in particular for over-wintering wildfowl. These habitats will be preserved and enhance where possible.</p> <p>3.7 The Council is engaging with Thames Water with regards to developments on or close to their sites to ensure that the safety of these facilities remains</p> <p>3.8 As noted in 3.6 above, the Council will ensure the integrity of designated sites and minimise the impacts of development</p> <p>3.9 The issue is noted by officers and the LPTG for further consideration – relevant draft policy within the Local Plan will be updated to provide greater clarification on this matter</p> <p>3.10 Waterbodies in the Borough which fall under the national and international designations for biodiversity have been discounted from consideration for development as this is an 'absolute constraint'. In addition, many of the Borough's waterbodies are within the Green belt and have not been identified to be rereleased. The site selection methodology makes clear the 'sieving' process for selecting the sites for potential allocation. The draft biodiversity policy intends to protect and enhance designated sites, amongst others, and the developing Biodiversity Action Plan will set out how this is to be done in greater detail.</p>

Leisure & Open Spaces

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
1. Provision of open space	<p>1.1 Parks and open spaces are required to encourage walking.</p> <p>1.2 Will have to travel outside the Borough to enjoy open spaces.</p> <p>1.3 Staines town centre will become desperately in need of open space as its population grows.</p> <p>1.4 Cannot afford to lose recreational land.</p> <p>1.5 Would welcome clarification as to what open space is expected in each development.</p> <p>1.6 Local Green Space sites should be included.</p> <p>1.7 Open spaces are lacking in our area.</p> <p>1.8 The Borough is unlikely to have any surplus land that is currently in use for sports, recreational and open space</p>	<p>1.1 There are a number of parks and open spaces across the Borough for use across a wide demography. As such it is recognised that this should go beyond formal and informal recreation and consider spaces for their tranquillity and wellbeing value as well. The Council continues to protect and enhance these spaces and to encourage the use of them as part of wider health and wellbeing strategies.</p> <p>1.2 Access to open space is a key facet of the Council's Open Space Assessment and is reiterated in draft policy E5: Open Space. The NPPF protects parks, open spaces and playing fields from development. The Council's access to open space seeks to ensure that residents have some form of space to use within 400 metres of where they live and to improve access for those where this is limited. Spelthorne benefits from a number of large parks, small recreation grounds and more natural spaces such as Staines Moor. Access to these and continued protection and enhancement of them are key strands of the Local Plan.</p> <p>1.3 The Council acknowledges the pressures of development on Staines and the need to retain and provide additional open space as part of this. Policy E5 will seek to secure such benefits and this as part of the Staines Masterplan process will facilitate improvement in access to open space and the river.</p> <p>1.4 The Council agrees that the loss of recreation grounds and parks would be detrimental and these are protected under the NPPF. Where open spaces have been identified for development, policy E5 requires that compensatory measures be made to mitigate the loss through either re-providing the one space on site or providing a financial contribution to improve significantly an open space close by the development site.</p> <p>1.5 The issue is noted by officers and the LPTG for further consideration. Draft policy E5 will be updated with further detail on what is required</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	to meet future development needs.	<p>following the Open Space Assessment stage 2 work and the supporting viability evidence.</p> <p>1.6 The issue is noted by officers and the LPTG for further consideration. The Council consulted on a methodology for Local Green Space (LGS) which follows Government guidance on how this should be applied. A further assessment document will be produced and a 'call for sites' exercise for LGS will be held later in the year for communities to put forward land that is not already in use as an allotment, park, recreation ground, playing fields or similar. The final LGS sites will be published following the completion of this process.</p> <p>1.7 The Council have published the Open Space Assessment which identifies areas which are deficient in open space provision. Where this is found, the Council will seek to address this through the Local Plan process.</p> <p>1.8 There are development pressures on the Borough for various types of development. The Open Space Assessment assesses current deficiencies and where these should be rectified whilst the Playing Pitch Strategy assesses the current and future demand for pitches across the Borough. These documents will help to inform the Local Plan with regards to where such provision is most required.</p>
2. Impacts on leisure activities	<p>2.1 Loss of land which is used for horse riding</p> <p>2.2 Loss of Staines and Laleham Sports Club</p> <p>2.3 Policy EC3 needs to be clearer when considering the loss of a facility or a change</p>	<p>2.1 The Council acknowledges that some proposed sites for development may currently have informal recreation taking place such as horse riding or other leisure activities. However the landowner(s) have promoted their land for development and on occasion, coupled with the GBA, this land may have been determined as being suitable for development. If the landowner were to cease the leisure activity taking place on their land then this would remove the recreational element of the land unless it was a designated recreation ground or park as this would be considered to be an absolute constraint as per the site selection methodology.</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	<p>of use for leisure and cultural facilities</p> <p>2.4 Greenfield recreation ground should not be considered for development</p> <p>2.5 What will happen with the leisure centre in Staines</p>	<p>2.2 The sports club have promoted the land for development as they see this as being the main way of being able to fund improvements to the current facilities. It is not proposed that the sports club will no longer use the site however this would some of the site being lost to for housing. The sports club would however remain with improved facilities.</p> <p>2.3 The issue is noted by officers and the LPTG for further consideration. The policy will be reviewed to ensure clarity and for the policy to be applied effectively.</p> <p>2.4 Greenfield recreation ground and the play facilities are in a poor condition. The draft site allocation proposes the loss of a small area of the grounds where the play facilities are to residential development. It would be a requirement of the potential development that the recreation ground is improved in quality and additional play facilities of a much improved quality and a better offer for local residents will be provided. The Council does not propose to lose the recreation ground.</p> <p>2.5 The Council have consulted on a new location for the leisure centre on the land between the current leisure centre site and the Council offices at Knowle Green. A planning application will then need to be submitted for consideration and this will be open for comments.</p>

Flooding

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
1. Site specific issues	<p>1.1 Wheatsheaf Lane and surrounding roads have flooded twice in 11 years, with many families and elderly people leaving their homes for over a year at the time.</p> <p>1.2 Developers will need to manage Affinity Water concerns about needing to protect or divert our existing apparatus. The following sites could be affected:</p> <ul style="list-style-type: none"> - Hitchcock & King, Stanwell Road, Ashford - De Havilland Way, Stanwell - Hanover House, Bridge Street, Staines - 96-104 Church Street, Staines - The Elmsleigh Centre, South Street, Staines <p>1.3 Concern that areas of the borough will be deliberately flooded to save the London underground for example. This has happened in the past (Wheatsheaf Lane, Staines) so could happen again. Yet no restriction has</p>	<p>1.1 Parts of Wheatsheaf Lane are in the 1 in 20 flood zone. This zone is effectively the functional floodplain and there are very strict controls to the type of development allowed. The Environment Agency will be consulted at all stages of producing the Local Plan and sites will not be brought forward that they object to.</p> <p>1.2 The Strategic Planning Team will discuss site constraints with Affinity Water as necessary when considering which sites should be taken forward.</p> <p>1.3 Planning restrictions in London are beyond the scope of the Local Plan</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	been made for London to restrict planning permission for basement building.	
2. Strategy & timetable	2.1 More time should be given to meet targets so local councils that have other challenges especially where there is a history of flooding.	2.1 The Strategic Planning team will consider all of the constraints and determine whether it is possible to meet the objectively assess housing need and the timescales within which development will be phased.
3. Flood protection and mitigation	<p>3.1 There is no restriction in type of building when building on or near flood plains. Only to protect the building not the local flooding issue. e.g. building green, on stilts etc. anything other than filling the ground with more concrete.</p> <p>3.2 Flood protections works to protect existing homes has not been started e.g. Staines.</p> <p>3.3 Welcome cross local planning authority cooperation and a consistent approach to the River Thames Scheme.</p>	<p>3.1 There is detailed government guidance regarding what types of building can be built in each flood zone. Please see Planning Practice Guidance¹.</p> <p>3.2 Specific scheme not named. The Council is very supportive of the forthcoming River Thames Scheme.</p> <p>3.3 Spelthorne BC is committed to work with Duty to Cooperate partners on strategic matters.</p> <p>3.4 The sequential approach will be applied, as advised by national policy.</p>

¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/575184/Table_3_-_Flood_risk_vulnerability_and_flood_zone_compatibility_.pdf

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	3.4 Where sites contain different flood zones, the sequential approach should be applied, as advised by national policy, to ensure the layout of the site avoids development within flood zones 2 or 3.	
4. Policy E2: Flooding	<p>4.1 Paragraph 2 - this paragraph should be re-worded given the sequential test is not required in all instances. As currently written, there is potential for confusion. The requirement to minimise flood risk where individual sites contain different flood zones is also unclear and should be clarified. Paragraph 5 - to avoid confusion, it is considered this should be amended to reflect national policy which sets out when a Flood Risk Assessment is required.</p> <p>4.2 Policy E2 relates to flooding but focuses on fluvial flooding. The policy should ensure that development does not increase the risk of flooding from all sources of</p>	<p>4.1 Officers will review the draft policy in light of the representations received and will amend where appropriate.</p> <p>4.2 Officers will consult with Aecom and the Environment Agency regarding the incorporation of text on sewer flooding.</p> <p>4.3 Policy wording will be checked and amended where necessary to ensure that it does not conflict.</p> <p>4.4 Careful consideration will be given to the proposed wording and will be discussed with key stakeholder such as the Environment Agency.</p> <p>4.5 Support noted.</p> <p>4.6 The definition of the Spelthorne Flood Zone 3b will be included after discussions with the EA and other key stakeholders.</p> <p>4.7 Supporting text will be added as requested.</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	<p>flooding. Additional text should be incorporated to address sewer flooding.</p> <p>4.3 Policy EN2 forbids rebuilding in the Green Belt to a size significantly larger than the original house. Policy E1 keeps this condition in clause 3, for extensions, and in the discussion, but omits it in clause 2, for rebuilding. Objection to this omission.</p> <p>4.4 To improve consistency in how surface water flood risk is reviewed across the county new policy wording is proposed in relation to surface water flood risk under part 3.</p> <p>4.5 Support for the principal of ensuring the flood risk sequential and exception test is applied in accordance with national policy.</p> <p>4.6 This policy defines the functional floodplain (3b) as the 1 in 20 year extent which we are in agreement with,</p>	

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	<p>and we support your approach of safeguarding areas of undeveloped Flood Zone 3b. However we advise that you also include a definition for functional floodplain where detailed modelling does not exist. Many authorities take a conservative approach in these circumstances and use flood zone 3 as shown on the flood map for planning.</p> <p>4.7 The supporting text should include reference to promote pre-application discussions with the Environment Agency and links to detailed Flood Risk Assessment guidance within the planning practice guide: flood risk and coastal change, along with the EA's own publication on when and how to prepare an assessment.</p>	
5. Sustainability Appraisal	5.1 The implementation of this policy will not enhance the indicators health, flooding, economy and climate change. The policy simply	5.1 The direct impact of a flooding policy on health outcomes is limited. It is difficult to undertake Sustainability Appraisal on a flooding policy against a "do nothing" scenario because this does not exist; there is strong national flooding policy. The Local Plan flood policy has to be in

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	seeks to maintain the status quo and will not making a positive contribution.	conformity with national planning policy so it is difficult for it to score well in Sustainability Appraisal.
6. Water	<p>6.1 According to Affinity Water simulation results, the demand increase due to the Spelthorne Domestic sites and Retail sites will be 1.37 MI/d and 0.75 MI/d respectively.</p> <p>With pressures at critical points in the network due to the new developments, major reinforcements in the network in the Spelthorne area will be required. This normally means new pipelines or new pumping stations will be required.</p> <p>There is sufficient water supply in the region.</p>	6.1 The issue is noted by officers and the LPTG to consider further.

Transport

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
1. Local and Strategic Road Network	<p>1.1 More development will place additional pressure on the existing road network and transport infrastructure.</p> <p>1.2 Oppose to more development without improvement to local transport infrastructure.</p> <p>1.3 The plan does not consider transport infrastructure improvements in parallel with new development.</p> <p>1.4 More development welcomed if there is corresponding transport infrastructure provision.</p> <p>1.5 Concerns over sustainable and active transport for new development sites.</p> <p>1.6 Concerns over more development resulting in more traffic and less parking.</p> <p>1.7 Construction of extra roads and road widening</p>	<p>1.1 The Council acknowledges that future growth will inevitably lead to increased pressures on infrastructure. By having a Local Plan in place, this will identify areas which are lacking in infrastructure which can be addressed over the Plan period.</p> <p>The impacts of road traffic and congestion that are projected to occur in Spelthorne over the plan period have been modelled using different scenarios of development. Surrey County Council has undertaken the traffic modelling for our emerging Local Plan as part of its draft Strategic Highways Assessment (SHA) report. This report can be viewed under the Local Plan evidence-base documents on the Council's website. A more detailed commentary on the analysis of the results will be contained in the final SHA report. The modelling evaluates the potential traffic impact of the development options for meeting the demands of the borough's future growth as consulted upon in this consultation. 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. This, however means that all the impacts identified are not expected to have a detrimental effect on the local transport network. More technical work will be undertaken to provide the level of detail required to support individual sites on matters related to or such as sustainable transport proposals or measures that improve access to or from the proposed development around the Borough.</p> <p>1.2 -1.4 and 1.9 -1.11 The Council is actively engaging with transport infrastructure providers and operators such as Highways England and other stakeholders such as site promoters/owners on an ongoing basis to ensure that infrastructure requirements are addressed by the plan. By working with infrastructure providers, we can plan for our future growth Cross border transport matters will be addressed through Memorandum of Understanding (MOUs) with neighbouring authorities and statutory bodies</p>

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	<p>schemes should be undertaken.</p> <p>1.8 Cross border transport infrastructure matters to be considered.</p> <p>1.9 Concerns over the Council's commitment to joint working with Surrey County Council as a Highway Authority.</p> <p>1.10 Lack of evidence over requirements associated with strategic sites.</p> <p>1.11 Concerns over the suitability of access routes.</p> <p>1.12 Investment in public transport infrastructure required.</p>	<p>where strategies and investments for promoting sustainable modes of transport will be aligned.</p> <p>Transport infrastructure will be dealt with through the Infrastructure Delivery Plan (IDP) which will support the Local Plan. Presently, the Council is developing an Infrastructure Delivery Plan (IDP) which will set out the infrastructure requirements associated with the proposed developments, how they will be delivered and funded. The IDP will review where additional demand can be accommodated. It will also seek to establish the detail of infrastructure requirements for individual sites. Specific arrangements will be put in place to manage construction traffic at individual sites via planning conditions and highway agreements with the County Council. Where damage to roads and footpaths has occurred due to construction vehicles this will remain the responsibility of the County Council in its role as a highway authority.</p> <p>By having an up-to-date Local Plan in place, this will state and indicate areas where we are lacking in transport infrastructure which can be addressed over the Plan period.</p> <p>1.6 The Council recognises the importance of providing adequate transport infrastructure for both existing and proposed development. As such, it is exploring options for infrastructure improvements subject to safety and capacity assessments. The Council also supports sustainable and active transport modes to minimise the reliance on cars. Therefore, the emerging local plan will ensure that all developments incorporate opportunities for active travel modes, including walking, cycling and public transport use.</p> <p>1.7 Noted. As part of the Council's on-going work on the IDP, we are engaging with Surrey County Council as the Highways Authority to discuss opportunities for expansion and to identify where the most pressing need for transport infrastructure is anticipated to be.</p>

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		<p>1.11 The Council followed a robust site selection methodology to determine which sites should be taken forward as potential allocations. The Council pursued its Strategic Option 4 which includes “increasing densities in town centres and near transport facilities and other areas where 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; and commissioning a Staines upon Thames masterplan”. The proposed allocations are considered to justify this strategy and will enable the borough to meet the government’s housing target. Officer assessments were informed by the Council’s robust Sustainability Appraisal which considered issues around accessibility of developments, availability of and opportunities for public transport, car ownership levels, quality of parking and highway safety concerns of the development options</p> <p>1.12 The Council is engaging with Surrey County Council as the highway authority on an ongoing basis as well as other service providers to help address shortfalls in the provision of public transport. Therefore, the emerging plan provides the opportunity to boost active and sustainable travel and this will be a key consideration as the plan progresses. Planning obligations at the planning application stage may be used to help fund transport infrastructure, whilst developments may be required to make appropriate contributions to local transport. The IDP will set out the transport needs for the Borough and this will help us to address deficits through the Local Plan.</p>
2. Road and Construction Traffic/Congestion	<p>2.1 Road traffic likely to cause gridlock.</p> <p>2.2 Road maintenance and congestion should be prioritised.</p>	<p>2.1- 2.8 The Council acknowledges that the scale, location and density of proposals can potentially impact the transport network.</p> <p>The impacts of road traffic and congestion that are projected to occur in Spelthorne over the plan period have been modelled using different scenarios of development. Surrey County Council has undertaken the</p>

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	<p>2.3 Little consideration given to airport-related traffic.</p> <p>2.4 An appraisal of traffic implications required to facilitate reasonable traffic flow.</p> <p>2.5 Traffic calming measures are welcomed.</p> <p>2.6 Volume of road traffic already high during peak times and will worsen.</p> <p>2.7 Proposals will attract HGVs on residential roads.</p> <p>2.8 How would the Council address traffic and parking concerns especially when the Highways Agency does not acknowledge that there is an issue?</p> <p>2.9 Areas in the Borough cannot withstand housing at this density and the corresponding increase in traffic.</p>	<p>traffic modelling for our emerging Local Plan as part of its draft Strategic Highways Assessment (SHA) report. This report can be viewed under the Local Plan evidence-base documents on the Council's website. A more detailed commentary on the analysis of the results will be contained in the final SHA report. The modelling evaluates the potential traffic impact of the development options for meeting the demands of the borough's future growth as consulted upon in this consultation. 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. This however, means that all the impacts identified are not expected to have a detrimental effect on the local transport network. More technical work will be undertaken to provide the level of detail required to support individual sites on matters related to or such as sustainable transport proposals or measures that improve access to or from the proposed development around the Borough.</p> <p>2.9 The level of housing need is based on population projections to enable enough housing to be built to meet the needs of the Borough. Transport modelling, an Infrastructure Delivery Plan and a Strategic Land Availability Assessment amongst other supporting evidence will inform which sites we allocate and how much housing can be accommodated in Spelthorne to meet needs.</p> <p>2.10 The Sustainability Appraisal has assessed all sites against the SA framework, which includes health and wellbeing impacts. The SA allows the Council to consider the expected social, economic and environmental impacts of development and as a result adverse impacts can be mitigated. Larger schemes will be expected to produce a health impact assessment when a planning application is submitted. This is a useful tool to assess and address the impacts of development proposals. This will ensure that health and wellbeing are properly considered in proposals.</p>

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	<p>2.10 Negative impacts on quality of life.</p> <p>2.11 Flooding and drainage issues.</p> <p>2.12 Traffic modelling or assessment appears to be a preliminary forecast based on the best information that is currently available.</p>	<p>2.11 Each allocated in the emerging Plan will be subject to a site specific flood risk assessment (FRA) where required. These will be undertaken by AECOM who have undertaken the Strategic Flood Risk Assessment.</p> <p>2.12 Please see 2.1- 2.8. A full (detailed) transport assessment will be produced in due course and consulted upon prior to the Local Plan submission.</p>
3. Car Parking	<p>3.1 Lack of parking provision.</p> <p>3.2 Opposition to loss of parking spaces.</p> <p>3.3 New development would exacerbate car parking issues along side streets.</p> <p>3.4 Scale of development proposed justifies the need to keep the existing car parks.</p> <p>3.5 The Council should provide alternative/replacement car parking (e.g. Ashford Multi-storey).</p>	<p>3.1 – 3.11 Noted. Whilst the Council desires to reduce reliance on cars as it is essential to developing a sustainable Local Plan, we also acknowledge that there are existing pressures on car parking in the Borough. The Council is working with Surrey County Council as a Highways Authority and other stakeholders and other infrastructure providers to establish where capacity genuinely exists and areas of greatest demand to ensure car parking spaces are available where appropriate over the Local Plan period.</p> <p>As part of the Council's on-going work on the IDP, we are engaging with Surrey County Council to ascertain opportunities for expanding and improving car parking where appropriate.</p> <p>The Staines Masterplan which is also underway will address car parking in the town centre. It is intended to offer bespoke parking solutions in Staines and to the rest of the borough.</p>

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	<p>3.6 An assessment of anticipated car parking needs is required.</p> <p>3.7 Each proposed unit should have sufficient parking as local roads cannot accommodate more parking.</p> <p>3.8 Developers should be required to provide public parking as part of their plans.</p> <p>3.9 Alternative modes of travel from sites should be explored.</p> <p>3.10 Redevelopment of parking sites supported to safeguard businesses and, shopping and entertainment/leisure activities.</p> <p>3.11 Shopping areas need parking to support economic activity.</p>	
4. Road / Highway Safety	4.1 Road safety concerns due to access issues	4.1 – 4.6 Road safety is also a key issue for the emerging plan. The Council followed a robust site selection methodology, underpinned by the Sustainability Appraisal which determined which sites should be taken

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	<p>4.2 Limited safe crossing points.</p> <p>4.3 Concerns over the safe movement of HGVs.</p> <p>4.4 Concern over development proposed next to schools where increased traffic and pollution could be a danger to children's health and safety.</p> <p>4.5 Busy nature of roads, size/layout/width restrictions of roads.</p> <p>4.6 Lack of traffic calming measures.</p>	<p>forward as potential allocations. Road and highway concerns were considered and influenced our decision-making.</p> <p>The Council will give greater consideration to sites identified for potential allocation following the consultation and we will continue to work with key stakeholders to identify particular areas where traffic calming measures can be reinforced to minimise road safety concerns. Discussions with the landowners will be explored alongside this to assess potential impacts on the wider area and any mitigation measures that may be required.</p> <p>At the planning application stage developers will be required to submit a transport assessment and a travel plan which will consider the road impacts and identify where a positive contribution can be made to improving road safety.</p> <p>Where applicable, planning obligations paid by developers will be used to secure improvements to the local area such as road and safety enhancements.</p> <p>.</p>
5. Support for sites due to good transport connections	<p>5.1 ST4/011 (Thames Lodge, Staines) – support due to good access to roads, parking provision.</p> <p>5.2 The Hamiltons, Sheep Walk, Shepperton (alternative site proposed) – easy access warrants further consideration.</p>	<p>5.1 Support noted.</p> <p>5.2 The Council will give due consideration to all proposed alternative sites as it develops the next iteration of the Local Plan. These will be assessed using the site selection methodology.</p>
6. Site specific transport matters	<p>6.1 Due to the proposals which will result in the loss of the</p>	<p>6.1 Noted. The Council is working with Surrey County Council as the highway authority and service providers on an ongoing basis to help</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	car parks in Staines, the Council should ensure that Surrey County Council increase public transport or provides alternative parking.	address shortfalls in public transport. The Local Plan provides the opportunity to boost active and sustainable travel and this will be a key consideration as the emerging plan progresses. Planning obligations at the planning application stage could be used to help fund transport infrastructure, whilst new developments could be required to make appropriate contributions to local transport. The IDP will set out the transport needs for the Borough and this will help us to address deficits through the Local Plan.

Environmental Pollution

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
1. Pollution – General comments	<p>1.1 Worsening air/noise pollution due to additional vehicle movements.</p> <p>1.2 More housing, more traffic and Spelthorne being on the flight path will result in a huge increase in pollution.</p> <p>1.3 Limited detail on how increased vehicle movements will affect key noise and air quality hot spots.</p> <p>1.4 Loss of Green Belt means loss of pollution receptors.</p> <p>1.5 Air/noise pollution set to worsen particularly with Heathrow expansion.</p>	<p>1.1-1.5 Spelthorne's emerging Local Plan is committed to contributing to and enhancing the natural and local environment by minimising and mitigating pollution. Opportunities to improve or mitigate the impacts of environmental pollution reflected in officer assessments. The Sustainability Appraisal framework particularly considered minimising and mitigating pollution through effectively managing traffic and travel and enhancing green infrastructure provision.</p> <p>This Preferred Options stage of the Local Plan is largely about determining if the principle of development on each site would be suitable or if there are any adverse impact that could not be overcome. More details on the impacts of pollution will come after the current consultation and we will be engaging with the relevant landowners to go over any of the impacts.</p> <p>Supplemented by the Transport modelling, the Infrastructure Delivery Plan and our Sustainability Assessment amongst other supporting evidence, the Council will continue to work proactively with Surrey County Council through the development of the Local Plan to ensure that these matters are appropriately considered and addressed for individual sites.</p>
2. Air pollution	<p>2.1 Large scale developments will generate more cars and this will worsen air quality.</p> <p>2.2 More private car use with lack of public transport.</p> <p>2.3 Constant monitoring of air quality is needed due to Spelthorne's proximity to</p>	<p>2.1-2.9 The whole of Spelthorne is an Air Quality Management Area (AQMA) and this is an important issue for the Local Plan to address. The individual officer assessments for each proposed allocation considered the effects of air pollution in areas in borough with poor air quality below EU standards.</p> <p>All the allocated sites were assessed against the Sustainability Appraisal framework including air pollution and identified its adverse impacts on the environment and subsequently recommended mitigation measures. Check</p>

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	<p>the M3, Heathrow the railway and the Eco Park.</p> <p>2.4 Green Belt land is needed to offset pollution.</p> <p>2.5 The Green Belt will be threatened with increased pollution caused by extra traffic.</p> <p>2.6 The Local Plan should address the urgent challenges around climate change including carbon storage and being a buffer for noise and air pollution.</p> <p>2.7 Transport modelling doesn't fully consider a review of the air quality outputs.</p> <p>2.8 Spelthorne is the worst area in the county for air quality.</p> <p>2.9 Increased tree planting required to offset pollution.</p>	<p>the Council's website for the detailed officer assessments which set out the reasons for specific allocations.</p> <p>The Council's Environmental teams are also actively involved in capturing air quality data via additional monitoring stations to assist in managing air quality improvements.</p> <p>Draft Policy E3: Environmental Protection has been included in the emerging Local Plan to address air pollution and will be applied where necessary to all new developments at the planning application stage. The Council will also ensure that proposals in the AQMA are consistent with the requirements set out in local air quality action plan</p> <p>All development proposals will need to be accompanied by Air Quality Assessments which will assess the potential impacts of air quality associated with additional vehicular movements on both our local and strategic road network as well as other issues such as waste disposal and construction. This will then give us a greater level of understanding with regards to the impacts of the proposed scheme.</p>
3. Noise pollution	3.1 Increased noise levels from new properties.	3.1-3.2 As noted in the reasoned justification of draft Policy E3, some parts of the borough suffer from high levels of noise particularly from Heathrow Airport and due to their closeness to the motorways, truck roads and other major roads such as A308. As such, the Council will require sound

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	<p>3.2 No amount of good design, etc. will reduce the adverse impact of flightpaths over the borough to acceptable levels.</p> <p>3.3 Disturbance from construction noise.</p>	<p>attenuation measures to be implemented in new schemes to minimise noise to an acceptable level where noise sensitive developments are being proposed in close proximity to noise generating development and vice versa. The Council will also continue to support controls on night flying at Heathrow to achieve progressive improvement in the night noise climate particularly for those who live in and/or around the north of the Borough, including Stanwell and Stanwell Moor.</p> <p>3.3 It is acknowledged that the construction process may generate noise pollution. As such, construction is a key consideration in the determination of planning applications.</p> <p>To ensure that the construction process is sustainable with regard given to pollution and the transportation of materials, planning conditions will need to be met by applicants. Planning conditions are a mechanism used by local planning authorities to ensure that once planning permission has been granted, developers fulfil certain requirements. Through planning conditions, a Construction Transport Management Plans will be required to set out how materials will be moved and managed during construction. This will need to be signed off by the local planning authority to ensure that it is satisfactory and keeps disruption to a minimum.</p>
4. Land Contamination	4.1 Concerns about chemical contamination of the site at Windmill Close (LS1/006) from previous use.	4.1 Ground conditions and the risk of land contamination for individual sites were considered under Part IIA of the Environmental Protection Act 1990 as part of the officer assessments. This was undertaken to ensure that the ground conditions of the allocated sites, their proposed uses and development would be protected from potential hazards.
5. Site Specific Issues	5.1 Land to South and West of Stratton Road (HS1/010) – Increased pollution.	The site specific issues raised are noted by officers and the LPTG for further consideration.

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	<p>5.2 Builder's Yard, Gresham Road (ST2/006) – Support change of use and reduction in noise.</p> <p>5.3 Staines Fire Station, Town Lane (AS1/003) - Landscaping could help to reduce the impact of pollution.</p> <p>5.4 Windmill close, Sunbury (LS1/006) – Water pollution concerns.</p> <p>5.5 Land west of Edward Way (AS2/005) – concerns over equipment along garden boundaries with associated noise and fumes.</p> <p>5.6 Land to South and West of Stratton Road (HS1/010) – close proximity to school could increase exposure to pollution.</p>	

Heathrow

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
1. Draft Policy SP7 (Heathrow Airport)	<p>1.1 Support for the Policy in principle.</p> <p>1.2 Traffic congestion should be mentioned.</p> <p>1.3 Airport parking should be considered.</p> <p>1.4 Heathrow's emerging surface access strategy should be referenced.</p> <p>1.5 The requirement for development to 'achieve the highest standard of design' should be removed.</p> <p>1.6 The Council should not restrict employment development to only Airport Supporting Development (ASD) as this will limit flexibility.</p> <p>1.7 Environmental impact/criteria should be strengthened.</p> <p>1.8 The environmental impacts of Southern Rail Access should be included.</p>	<p>1.1 – 1.13 The issue is noted by officers and the LPTG to consider further.</p> <p>After this Policy was consulted on, the Aviation National Policy Statement (ANPS) was ruled unlawful because it failed to take into account the UK Government's commitment to reduce carbon emissions. The Court of Appeal on 27 February 2020 ruled that government's decision to allow the proposed expansion at Heathrow is unlawful. The ruling inferred that the expansion is illegal over climate change but dismissed all other appeals related to air and noise pollution, traffic, and the multibillion pound cost of the runway. This means that by allowing the expansion to go-head, the UK's commitment to reduce greenhouse gas emissions to net zero by 2050 under the Paris Agreement will not be met. The Court of Appeal has told the government to either draw up a whole new policy document (Airports National Policy Statement – ANPS) or amend the current ANPS to make it compatible with the Paris Agreement. To approve the third runway and its associated developments, the new National Policy Statement will have to be compatible with the UK's commitments to Net Zero emissions by 2050, in line with the Paris Accord. Heathrow Airport Limited has indicated it will be appealing to the Supreme Court on the one issue.</p> <p>In light of this, the Council is liaising with Heathrow Airport Limited on its intentions for the airport expansion Development Consent Order (DCO), next steps and case for its third runway and will revise or amend this Policy to reflect Heathrow's emerging actions, the Council's stand in due course and potential impacts on the borough, particularly Stanwell and Stanwell Moor.</p>

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	<p>1.9 Support for the Council's vision to work strategically with other local authorities.</p> <p>1.10 Support for the Council's aim to deliver the best scheme for southern rail access.</p> <p>1.11 Objection to the Council's proposal to only provide a southern rail link to Staines Station.</p> <p>1.12 Remove the text on green belt.</p> <p>1.13 Greater reference to housing provision associated with airport required.</p>	
2. Other Heathrow Expansion matters	<p>2.1 The Council's in-principle support for the sustainable expansion of Heathrow Airport is welcomed.</p> <p>2.2 The Council should harness the growth associated with its strategically advantageous location</p>	The issues are noted by officers and the LPTG to consider further. Please refer to officer response 1.1 – 1.13 under the draft Policy SP7 (Heathrow Airport) sub-theme.

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	<p>adjacent to Heathrow Airport.</p> <p>2.3 Environmental concern over the expansion of Heathrow.</p> <p>2.4 More of the borough's Green Belt land will be under threat.</p> <p>2.5 The wider logistics sector should be considered.</p> <p>2.6 Unclear on infrastructure provision associated with Heathrow.</p> <p>2.7 Additional housing needs associated with expansion.</p> <p>2.8 Why has the Local Plan not and the Heathrow expansion response not been more joined-up?</p> <p>2.9 Suggestion to build the homes the Borough needs on the proposed Heathrow Parkway site in Stanwell to protect that land from developers.</p>	

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	<p>2.10 Objection to the expansion of Heathrow Airport due to pollution, congestion and strains on infrastructure.</p> <p>2.11 Mitigation important.</p>	
3. Site specific issues	<p>3.1 Land to the west of Town Lane (SN1/015) – Air pollution and congestion likely to worsen due to its proximity to the airport.</p> <p>3.2 Land west of Edward Way, Ashford (AS2/005) - Open spaces under threat as the airport expands.</p> <p>3.3 Objection to the expansion of Heathrow due to the potential impacts residents in Stanwell Moor.</p> <p>3.4 Land at Green Acre Farm, Bedfont Road and Crane Road (SN1/003 and SN1/007) –Should be reconsidered.</p> <p>3.5 Land South of Southern Perimeter Road (SN1/008) – Should be reconsidered.</p>	The issues are noted by officers and the LPTG to consider further. Please refer to officer response 1.1 – 1.13 under the draft Policy SP7 (Heathrow Airport) sub-theme.

Heritage

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
1. Draft Policy DS3: Heritage Conservation and Landscape	<p>1.1 Support for this policy as it protects local heritage.</p> <p>1.2 Support for Policy SP5 and SP6 and specific heritage references.</p> <p>1.3 Should further reflect existing policies EN5 and EN6 – more specific.</p> <p>1.4 What is a 'heritage asset'?</p> <p>1.5 This proposed new policy does not satisfactorily demonstrate the fulfilment of the NPPF (paragraph 185).</p> <p>1.6 The policy needs to include stronger wording.</p> <p>1.7 The Local List should be reviewed.</p>	<p>1.1 – 1.3 The issues are noted by officers and the LPTG to consider further.</p> <p>1.4 Historic England defines a Heritage Asset as a “building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).</p> <p>1.5 – 1.7 The issues are noted by officers and the LPTG to consider further. This draft policy was written in line with the NPPF, however, officers will give consideration to rewording it to reflect the issues raised.</p>
2. Other heritage concerns	<p>2.1 The scale of the developments proposed could result in the loss of historic buildings and artefacts. Conversely, it could also provide opportunities to investigate archaeology.</p>	<p>2.1 – 2.7 Surrey County Council has a dedicated Heritage Conservation Team and one of their main roles is to advise on proposals which affect heritage assets either directly or indirectly. The County Council has been consulted on all the proposed allocation sites. However, we will continue to engage with the County Council as the Local Plan progresses and we are satisfied with a list of site allocations to take forward.</p>

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	<p>2.2 The emerging Plan should commit to preserving historic buildings and conservation areas.</p> <p>2.3 No specific mention is made in the emerging plan's proposals about enlarging, improving or relocating the Museum.</p> <p>2.4 The plan should commit to replacing existing leisure facilities and cultural attractions.</p> <p>2.5 Spelthorne's Listed buildings and conservation sites should be protected from development impacts.</p> <p>2.6 The loss of the nearby car parks could adversely affect the Museum's activities.</p> <p>2.7 Importance of consultation with the Historic Environment Record</p>	<p>New development which have the potential to affect a heritage asset will have to be accompanied by a statement describing the significance of the heritage asset affected and the contribution of their setting to that significance. The level of detail should be proportionate to the significance of the heritage asset. The details should also be sufficient to understand the potential impact of the proposal on the significance of the heritage asset.</p> <p>Draft Policy DS3: Heritage Conservation and Landscape will inform decision-making at the planning application stage. Where a development is designated as heritage asset on or near a non-designated site which may have their setting directly impacted by the proposals, an appropriate Heritage Impact Assessments (HIA) or desk-based assessment and, where desk-based research is insufficient to properly assess the interest, a field evaluation will be required. The HIA will identify heritage assets and their significances and, how they will be protected, enhanced or mitigated as part of a new development. This is to ensure that there is no harm or loss to the borough's heritage assets and their setting.</p> <p>Alternatively, if an allocation is likely to cause substantial harm or total loss of significance to a designated heritage asset, the benefit of bringing that site back into use would have to outweigh the harm or loss. This will have to be demonstrated before the development will be enabled.</p> <p>As the plan progresses, the Council will ensure that the requirements of the NPPF in relation to the historic environment are reflected in specific policies for each allocation where a heritage asset appears to be at risk of neglect, decay or other threats. This requirement will be applied to further assessments to ensure that greater weight is given to asset conservation.</p>
3. Site specific issues	3.1 96-104 Church Street (ST4/004) – Support for the site being used for	3.1 – 3.11 The issue is noted by officers and the LPTG to consider further. The Council has regard for sites that have been identified as having special architectural or historic interest. Therefore, the Council will work

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	<p>redevelopment but new development should be kept in line with local character.</p> <p>3.2 Oast House (ST3/004) - Grade II Listed on site are worth preserving.</p> <p>3.3 Land South and West of Stratton Road (HS1/010) - Greater consideration should be given to preserving this field as a historic Middlesex greenfield landscape.</p> <p>3.4 147 Staines Road West, Sunbury (SC1/003) – Historic investigation required.</p> <p>3.5 Many sites which are over 0.4ha in size raise archaeological concerns or are within an Area of High Archaeological Potential.</p> <p>3.6 Stanwell Bedsits (SN1/012) - This site is adjacent the Stanwell Conservation Area.</p>	<p>collaboratively with Historic England, Surrey County Council and other interested parties to review the significance of the identified heritage assets and their setting.</p>

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	<p>3.7 Thameside, South Street, Staines (ST1/037) - There is a listed Obelisk adjacent to the south west corner.</p> <p>3.8 Thameside Arts Centre, Staines (ST1/031) - Potential loss of an architectural gem, which we should embrace.</p> <p>3.9 Land at Chattern Hill (AE3/009) – Heritage links.</p> <p>3.10 Land of Worple Road, Staines (RL1/007) - Impacts on the character of Laleham.</p> <p>3.11 High density development may have impacts on the setting of nearby riverside heritage assets.</p>	

Character of Area

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
1. Visual Impact	<p>1.1 The scale of the developments proposed will significantly change the existing landscape character.</p> <p>1.2 Green belt land should be preserved to keep the special character of historic towns and villages.</p> <p>1.3 The design of new developments should adhere to character areas.</p> <p>1.4 Concern over the loss of rural and suburban settings to highly urbanised areas.</p> <p>1.5 The character of areas are important as they support wildlife, provide a barrier to pollution.</p> <p>1.6 Links between character and heritage assets.</p> <p>1.7 Permanent locations occupied by gypsies, travellers and showmen peoples and the number of vehicles present on these</p>	<p>1.1 – 1.8 The Council understands that new developments can bring significant changes to the landscape and the townscape. The Site Selection Methodology included an assessment of 'Landscape Character and Townscape' at stage 2b. Officers assessed the impact of development on the wider environment. In addition, the Sustainability Appraisal framework also includes objectives 7 and 8 which address townscape and landscape character. All sites have been assessed against these criteria and were deemed to have acceptable impacts, subject to appropriate mitigation.</p> <p>At the planning application stage where more details are sort on proposals, applicants will be required to demonstrate how their proposals will make a positive contribution to the street scene and character of an area as well as across the borough. The level of detail required will have to be proportionate to the scale and nature of the development.</p> <p>Draft Policy DS3: Heritage Conservation and Landscape, in conjunction with draft Policy DS1 (Place shaping) will inform decision-making at the planning application stage. Draft Policy DS3 sets out that proposals will be supported if they protect and enhance the local character of the area and have regard for the wider environment whilst draft Policy DS1 focuses on how through high quality design and layout new developments can contribute positively to local character. Applicants on the other hand will have to demonstrate that the character of their proposal have complied with these policies.</p> <p>Where applicable, the Council's SPD on design and Surrey's Landscape Character Assessment will form the basis for decision- making at the planning application stage.</p> <p>.</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	<p>sites could potentially threaten local character.</p> <p>1.8 Loss of views.</p>	<p>Though the Council intends to maximise densities in locations near to transport hubs and in high density areas like town centres and, the Council will seek to ensure that new developments across the wider area adhere to local character.</p> <p>The officer site assessments considered visual amenity impacts from public viewpoints to consider how outlook could potentially be impacted by development. Loss of a view is not a material planning application and outlook is not a consideration in Green Belt policy. The assessment of visual amenity and landscape was weighed against other assessment criteria in order to identify potential development sites. We also took this into account to help mitigate adverse impacts as much as possible.</p>
2. Site specific issues	<p>2.1 Land to the west of Town Lane (SN1/015) - situated on the edge of the reservoir which has SSSI status and is a designated green belt land. Development would change its character.</p> <p>2.2 Land to the South and West of Stratton Road (HS1/010) – This site should not be perceived as being 'semi-urban' in character.</p> <p>2.3 Waterworks sites (LS1/006) & (LS1/007) - Allocating these sites for development will decimate Charlton Village and its rural setting.</p>	<p>2.1– 2.5 The site-specific issues are noted by officers and the LPTG to consider further. Please refer to officer response 1.1 – 1.13 under the Visual Impact sub-theme.</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	<p>2.4 Bridge Street car park (ST4/002) - The proposals for this site are and unsuitable for a sensitive riverside location at the entrance to the town.</p> <p>2.5 Land off Worple Road (RL1/010) – This site should be preserved as it provides space for nature and views.</p>	

Consultation Process

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
1. Consultation strategy – general	<p>1.1 The Council should hold a 'Citizens Assembly' to give all residents the opportunity to define their local community priorities and how to achieve these.</p> <p>1.2 The consultation was a tick box and PR exercise.</p> <p>1.3 The consultation was too technical and didn't target enough people.</p> <p>1.4 Communication to local residents was very poor and needed more than a Bulletin article.</p> <p>1.5 It is a missed opportunity as many did not find out about the consultation process, meetings and the extent of the plans until the entire process was either due to end or after it had ended.</p> <p>1.6 The Council urged not to ignore local residents'</p>	<p>1.1-1.9 The Council is keen for the public to get involved in the planning process as everyone can make a real difference to the future of the area in which they live and work.</p> <p>NPPF paragraph 16(c) indicates that a plan should: be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees. In line with this policy, the Council engaged early and throughout during the plan preparation process in a meaningful way. So far, we have captured the views of local communities, businesses and other stakeholders on the potential issues the borough faces and the options for resolving them.</p> <p>Besides offering different avenues to capture the views of the public including dialogue during the 2018 Issues and Options and 2019 Preferred Options Consultations, we have made it clear that the public can always contact us or submit their views on planning related matters at any time.</p> <p>The Council recognises that no technique is more effective or valuable than the other and so we employed an array of techniques that are underpinned by sound ethical principles, and suitable and sensitive to the needs, interests, backgrounds and experiences of the community. The Council involved people from all sections of the society via written notifications, online-based technology, publications, face to face briefings and displaying the documents at the Council Offices and in public libraries across the borough.</p> <p>Due to COVID-19, the Council will be exploring new and better ways to consult on all aspects of its planning service to reach the widest possible number of people and organisations.</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	<p>responses to the 2018 consultation.</p> <p>1.7 The Council urged to go all out to defend local residents and protect their environment.</p> <p>1.8 Some respondents impressed with the clarity of the online information and documents.</p> <p>1.9 The development of the proposals was not transparent - Why were decisions made before asking the people it affects?</p> <p>1.10 General support for the current Local Plan but would prefer it if the Council can get central Government to reduce housing targets.</p> <p>1.11 The Council's Sustainability Appraisal should have been consulted on separately beforehand and not as part of this consultation process.</p>	<p>For the local communities and businesses who participated in the consultation process mainly by providing, we hope that by acknowledging and reviewing these responses it gives you some assurance that we value your input, we are listening to the concerns you raised and we will address them where possible but in line with national guidance and government policy. In the meantime, we hope that our engagement on the emerging plan has been "listening exercise" rather than merely a "tick box exercise" or a "receipt of responses".</p> <p>1.10-1.13 The issues are is noted by officers and the LPTG to consider further.</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	<p>1.12 A proper Policies Map should have been published.</p> <p>1.13 The Council should consult the Gypsy and Traveller communities to ascertain whether they have a preferred site.</p>	
2. Consultation period	<p>2.1 Pleased the consultation period was extended.</p> <p>2.2 The consultation period was short.</p>	<p>2.1 The issue is noted by officers and the LPTG to consider further.</p> <p>2.2 The consultation period which run from 5 November 2019 to 7 January 2020 exceeded the minimum statutory consultation period of six weeks. The Council went significantly over and above the statutory consultation period in order to give the public more time to review the documents and submit any comments.</p>
3. Consultation material	<p>3.1 Concerns raised over the sheer scale of the online documents.</p> <p>3.2 Online documents were complex. There should be a summary document overview.</p> <p>3.3 Concerns over transparency – Due the complex nature of the documents local residents struggled to understand the proposals.</p>	<p>3.1 – 3.6 The issues are noted by officers and the LPTG to consider further.</p> <p>In engaging with the public during the Preferred Options consultation, the Council ensured that all the details of the proposals; plans and supporting documentation; were clear, non-technical and accessible through several channels, enabling the consultation material to be understood by and reach a wide range of audiences in the local community.</p> <p>To open more avenues for local communities and other stakeholders to participate in the consultation, the Council employed techniques that were suitable and sensitive to the needs, interests, background and experiences of the people that it engaged.</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	<p>3.4 Some of the information presented was misleading – For example, the percentages that were used by the Council in the consultation.</p> <p>3.5 No mention was made to the Council's Draft Sustainability Appraisal in the Spelthorne Winter Bulletin 2019.</p> <p>3.6 Local Plan documents were far easier to use than is often the case.</p>	
4. Engagement techniques	<p>4.1 Timing and distribution of the Bulletin was not great.</p> <p>4.2 There was no direct mailing from the Council to the residents bordering the sites up for consideration.</p> <p>4.3 Consultation briefings were not engaging. Question time was limited.</p> <p>4.4 Difficult to respond without internet access.</p>	<p>4.1-4.5 Local Planning Regulations (England) 2012 paragraph 35 (a and b) requires Councils to make Local Plan documents available for inspection at their principal office and at such other places within their area as the local planning authority consider appropriate, during normal office hours, and published on the local planning authority's website.</p> <p>The Council acknowledges that people are not homogenous and so people will get involved in planning decision-making in different ways. For this reason, the Council varied its consultation techniques.</p> <p>Apart from the consultation documents being made available on the Council's website and on the consultation portal, there was an 8-page insert in the Spelthorne Winter Bulletin (2019) which was delivered to every household in the borough. Also, all the consultation documents were displayed at the Council Offices and in local libraries to allow local</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	4.5 Apart from the local Bulletin, local residents would welcome the use of other channels of communicating information.	residents and businesses to view, gain full understanding of and comment on the proposals. Other forms of social media such as Facebook and Twitter, public notices and press releases were also utilised to publicise information on the emerging plan and other supporting documents.
5.Site specific consultation issues	<p>5.1 Land to South and West of Stratton Road (HS1/010) - Further public consultation regarding the Stratton road site is required.</p> <p>5.2 Land to the west of Town Lane (Site ref SN1/015) – New owner of the land west of Town Lane not consulted before the site was considered for allocation.</p> <p>5.3 Builder's merchant (SE1/003) - The Council have not fully considered the nature of the business.</p>	The site specific issues raised are noted by officers and the LPTG to consider further.

Other Issues

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
1. Surrey County Council Asset Review	<p>1.1 Why is Shepperton Youth Centre closing when Surrey County Council (SCC) are investing in them?</p> <p>1.2 Assets and services should not be lost.</p> <p>1.3 Services should be replaced.</p> <p>1.4 Loss of parking spaces at Staines health centre would be negative.</p> <p>1.5 Concerns over loss of Staines scout hut.</p> <p>1.6 Loss of Sunbury Adult Education Centre is unacceptable.</p> <p>1.7 Temporary accommodation for Shepperton Library could adversely impact its use.</p> <p>1.8 Concerns over moving and condensing facilities. These are already stretched.</p>	<p>1.1 Surrey County Council put forward this site as available for consideration in our new Local Plan. The proposed allocation of any County Council land which provides community services would be dependent on the County's own internal service review and subject to re-provision either on-site, possibly in a new building with community use on the ground floor and flats above, or nearby in order to serve that community. This requirement is made clear in the proposed allocations document. These are sites that could come forward anyway as a planning application for redevelopment so the allocation simply gives an extra layer of control for us as the local authority in terms of what is built in its place. Our draft policy prevents the loss of community facilities so an allocation would only be made if we were satisfied the service would be retained. This would be the case for a planning application too, which would still be required even with an allocation in place.</p> <p>1.2 – 1.3, 1.8 – 1.10, 1.15 Spelthorne Borough Council previously met Surrey County Council to discuss their assets. Surrey CC are currently undergoing a service review to consider if service provision can be made more efficient and ensure that assets meet needs. Following discussions with SCC a number of sites have been identified for potential allocation, however these are all subject to service re-provision to ensure that community needs are all suitably met. This will be either on site as part of a mixed use scheme or in an alternative suitable location within close proximity. As these sites are all within the urban area they could come forward for development on an ad hoc basis with a planning application, however by allocating them in the Local Plan this provides greater certainty and allows for the Council to plan holistically.</p> <p>1.4 & 1.12 – 1.13 Spelthorne Borough Council will engage with Surrey County Council further once allocations are firmed up. This will involve discussing proposals and supporting infrastructure so that services can be maintained. The Council will seek to boost active and sustainable travel</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	<p>1.9 Loss of facilities with more residents and houses.</p> <p>1.10 Where will re-provided services be located?</p> <p>1.11 SCC assets should not be considered as this is profit-driven.</p> <p>1.12 Relocated services could be less accessible.</p> <p>1.13 More cars are likely if Burges Road is redeveloped.</p> <p>1.14 There could be noise issues if community facilities such as youth centres are combined with residential in mixed use schemes.</p> <p>1.15 Outdoor recreation facilities should be retained.</p>	<p>whilst maintaining some element of parking where appropriate. At the planning application stage, a travel plan will need to be submitted.</p> <p>1.5 Spelthorne Borough Council will continue to engage with Surrey CC to consider potential allocations further. It will be for Surrey CC to re-provide any services lost as part of its proposals. It is hoped that allocating several sites in the Knowle Green area will allow for a more comprehensive and holistic redevelopment. More detail will come via the allocation and at the planning application stage.</p> <p>1.6 All allocations are subject to the re-provision of existing services. This means that it will be for Surrey CC to either re-provide the existing use on site or in a suitable alternative location within close proximity.</p> <p>1.7 It will be for Surrey CC to set out how services will be maintained. They will also need to provide a construction management plan where applicable, which will set out how the site will be managed throughout the construction phase.</p> <p>1.11 Publicly owned sites, such as those owned by Surrey CC and Spelthorne BC provide more certainty and control of the delivery of development. The Government requires us to provide over 600 homes each year and without publicly owned assets, this would make the challenge of meeting needs greater. If the urban area is not prioritised, whereby many potential allocations are publicly owned, this could risk the need to consider Green Belt release further in the long term.</p> <p>1.14 Noise will be carefully considered in detail at the planning application stage. Spelthorne BC will work with Surrey CC to come to an appropriate solution. The developer will need to demonstrate that the structure of the development will be sufficient to adequately contain the noise generated within the development. Suitable noise attenuation measures will be put in</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
		place to minimise any impacts and design will need to be carefully considered to reduce noise transfer.
2. Staines Masterplan	<p>2.1 To avoid piecemeal development arising, it is advisable that the development description for a site should include the text - 'An integrated, coordinated and comprehensive planning approach will be taken to the site. The site will require a single Masterplan to ensure this is delivered and a high-quality design outcome achieved'</p> <p>2.2 The Masterplan should provide site specific guidance on the design of larger and tall buildings</p> <p>2.3 The masterplan should ensure that high density development is delivered in Staines-upon-Thames but the conservation area would be preserved and enhanced</p>	<p>2.1 The issue is noted by officers and the LPTG to consider further.</p> <p>2.2 The issue is noted by officers and the LPTG to consider further – the character of the area will be a key component of the masterplan as well as impacts on the views of the river</p> <p>2.3 The issue is noted by officers and the LPTG to consider further.</p> <p>2.4 The Staines Masterplan is a key aspect of the Local Plan to deliver a better integrated and functioning town centre.</p> <p>2.5 The Government's standardised methodology requires Spelthorne to provide at least 603 dwellings per year over the Plan period. To achieve this, one of the main elements of the spatial strategy for the Local Plan is to maximise densities and development opportunities on brownfield land and in urban areas. As the largest urban area in the Borough, Staines – upon-Thames will be required to play a key role in achieving this. The masterplan will allow us to take a new look at Staines-upon-Thames and how we can maximise development opportunities along with ensuring the viability and vitality of the town. This will require a more efficient use of land for development and in some cases this will result in higher densities however this should also be married to ensuring that sufficient retail and leisure opportunities exist along with access to the river, provision of open space and encouraging new vibrancy to the town centre.</p> <p>2.6 The issue is noted by officers and the LPTG to consider further.</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	<p>2.4 Promote the completion of the Staines Masterplan</p> <p>2.5 Take a balanced view and reduce the highest densities in Staines and drop the extra 1600 houses from the Staines Masterplan</p> <p>2.6 The text would benefit from clarity so that it's clear that its preparation be a bilateral and inclusive process with input from key stakeholders</p> <p>2.7 New developments should be in line with one another, and not a mismatch of design, architecture and building materials.</p> <p>2.8 Significant number of homes are attributed to the Staines opportunity area and are dependent on the delivery of a Master Plan. The timescales for the delivery of, or commitment to, the Master Plan are not clear.</p>	<p>2.7 The design of the buildings and materials used as part of the re-development within the Staines Masterplan will be carefully considered and will be expected to respect the character of the part of the town in which they are to be located.</p> <p>2.8 The Council have appointed consultants David Lock Associates to prepare the masterplan. The masterplan is to be an integral part of the Local Plan and its spatial strategy and therefore the intention is for the masterplan to be developed in line with the development of the Plan</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
3. Plan period	<p>3.1 The Local Plan is unlikely to be produced, submitted, examined, and adopted over the next 12 months.</p> <p>3.2 The plan period should be amended to a later and more realistic date.</p>	3.1-3.2 Our work on the emerging Masterplan for Staines and the Coronavirus (COVID-19) outbreak has meant that we revise our timetable accordingly. We anticipate that the next stage of consultation (Regulation 19) will take place in early 2021. We will share the most up-to-date information on this issue and any further updates on the website in due course.
4. Crime & privacy	<p>4.1 Crime and fear of crime.</p> <p>4.2 Privacy/Safety of residents.</p> <p>4.3 Assumption that the gypsy and traveller sites will lead to an increase in crime.</p> <p>4.4 Concerns over increased anti-social behaviour.</p> <p>4.5 Concerns about walking around safely.</p> <p>4.6 Extra security will cost residents money.</p> <p>4.7 Concerns that urban areas will deteriorate and lead to more crime.</p>	<p>4.1 The Council acknowledges concerns that development may bring a fear of crime with additional residents. The new developments will be designed to provide open areas with natural surveillance from houses and to be well-lit. This will assist in ensuring that people can use these areas safely. It is not anticipated that additional development would correlate to increased crime.</p> <p>4.2 The Council acknowledges concerns over issues of privacy and safety for residents. All new development should be designed in a way to minimise impact on privacy of existing dwellings and others areas such as schools and open spaces. Issues involving privacy such as overlooking are dealt with as material considerations in each planning application that is submitted.</p> <p>4.3 This is a generalisation of a community who the Council are required to plan for. The G&T sites proposed will be formal sites with appropriate facilities, including waste management. The sites will be run by a site manager and will be supported either by Surrey County Council or Spelthorne Council. By formally laying out these sites, this will help the Borough meet its requirement to provide suitable sites for gypsy and travellers. Further information on this can be found in the Gypsy and Traveller key theme tab.</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
		<p>4.4 The issue is noted by officers and the LPTG to consider further. The Council operates its parks and open spaces to ensure minimised incidents of anti-social behaviour. The Council will work with Surrey Police to identify areas that may be vulnerable to ASB and direct resources to this where appropriate.</p> <p>4.5 Please refer to 1.1 above. The Council will work with Surrey Police to ensure all areas are as safe as possible for people to walk around.</p> <p>4.6 If a resident wishes to invest in additional security measures for their property then this is at their own discretion. The Council will seek to ensure that crime and anti-social behaviour does not occur in conjunction with Surrey Police. If there are issues of this on Council-owned land then this should be reported to neighbourhood services.</p> <p>4.7 New developments will be required to be well-designed and function within the existing character where possible. Developments can be designed to be open and allow natural surveillance of areas. In terms of existing buildings, the Council will ensure that public buildings and spaces are clean and well-maintained and would ask residents and business to do likewise. Deterioration of a neighbourhood often happens following the 'broken windows' theory whereby if parts of the neighbourhood are in poor condition then others can fall into similar disrepair. The Council, residents' groups and other voluntary societies play a key role in ensuring the local areas remain in good condition.</p>
5. Minerals and Waste	<p>5.1 Gravel and extraction of land at rear of Worple Road.</p> <p>5.2 Issues over vehicular access to the mineral extraction on Manor Farm</p>	<p>5.1 This site was put forward by the landowner for housing development. Planning permission is in place for the land to be worked and restored to a lake and open area of land. The Council are engaging with SCC and the landowner to determine the timescales for the extraction operations and the submitted proposal for housing development to seek clarification of the intentions for this land.</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	<p>5.3 Impact on Minerals Safeguarding Area (MSA)</p> <p>5.4 Oak Leaf farm should be taken out of the Green Belt</p>	<p>5.2 The Council acknowledges concerns relating to this. We continue to work with SCC and Brett's over various aspects of the extraction of the site and will work progressively to minimise and mitigate any issues that may arise from this.</p> <p>5.3 Some of the proposed allocations are within or close to MSA. This must be considered if a planning application were to come forward and Surrey County Council would need to be informed and provided opportunity to comment on this matter as the Minerals and Waste Authority.</p> <p>5.4 The site is in strongly performing Green Belt and has not been identified for further consideration in the GBA stage 2. This would not align to the GB approach within our spatial strategy (see Green Belt key theme for further detail) The site has planning permission for a recycling waste use and has been allocated for waste uses in the SCC 2008 Waste Plan and as a draft allocation in the 2019 Waste Plan.</p>
6. Officer site assessment process	<p>6.1 Support for the exclusion of land in flood zone 3b.</p> <p>6.2 Stage 2b of the site assessment process should consider the sequential and exception flood tests.</p> <p>6.3 River corridors and their natural biodiversity should be assessed.</p> <p>6.4 Principal aquifers should be assessed.</p>	<p>6.1 The issue is noted by officers and the LPTG to consider further.</p> <p>6.2 Spelthorne is a very constrained borough meaning that we have to consider land in flood zone 2 and 3a if we are to meet our housing need set out by central government. This will be given further consideration through a strategic flood risk assessment stage 2. This will consider the potential flood risk at each potential allocation site as well as how flood risk could be managed on site. Further detail will also come at the planning application stage.</p> <p>6.3 Biodiversity has been considered through stage 2b of the assessment process, as well as through the Sustainability Appraisal.</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	<p>6.5 Availability should be confirmed early in the process.</p> <p>6.6 Residents have not been consulted regarding the views from inside properties.</p> <p>6.7 Residents have not been consulted about their use of the Green Belt.</p> <p>6.8 High pressure pipeline constraints should be considered at stage 2b.</p> <p>6.9 It is unclear whether you intend to compile site specific policies for each allocation, or whether you are intending that each site be in general conformity with all, or only relevant policies.</p> <p>6.10 Why are sites that have 75% ground water flooding being considered?</p> <p>6.11 Flood mapping is out of date.</p>	<p>6.4 The issue is noted by officers and the LPTG to consider further. Utilities providers will be consulted further as the Local Plan develops to discuss any impacts on water provision and how they could be overcome, if necessary.</p> <p>6.5 The issue is noted by officers and the LPTG to consider further. It is acknowledged that land ownership may change throughout the course of the development of the Local Plan. As we look to firm up our allocations we will be engaging further with landowners to discuss the details of each site and to confirm the position on availability.</p> <p>6.6 In developing the Site Selection Methodology officers felt it was appropriate to consider views from public vantage points given the scale of the project. This was felt to be the most pragmatic approach to considering visual amenity, with site visits supplemented by aerial mapping and additional research where appropriate.</p> <p>6.7 The purpose of Green Belt is to prevent urban sprawl by keeping land permanently open, with five purposes set out in the National Planning Policy Framework 2019. Public use is not a purpose served by the Green Belt. In considering the performance of sites, the Green Belt Assessment used a robust methodology to consider each site's local and strategic importance.</p> <p>6.8 The issue is noted by officers and the LPTG to consider further. Utilities providers will be consulted further as the Local Plan develops to discuss any impacts on infrastructure and how they could be overcome where necessary.</p> <p>6.9 It is intended that a specific policy for each allocation will be included in the Local Plan. This will set out any specific requirements. We would expect any planning application to adhere to the wider set of policies within the Local Plan.</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	<p>6.12 The Sustainability Appraisal doesn't set out how many units each strategic option will provide.</p> <p>6.13 The Sustainability Appraisal is vague.</p> <p>6.14 Sustainability Appraisal indicators are unrealistic.</p> <p>6.15 The Council should hold a 'Citizens' assembly' allowing all residents in Spelthorne the opportunity to define their local community priorities including how these are best achieved.</p> <p>6.16 Lack of engagement with local residents.</p> <p>6.17 How have assumptions about yield been determined? What counts as a dwelling?</p>	<p>6.10 The Environment Agency data on groundwater flooding shows areas susceptible to ground water flooding and this is provided as a strategic scale of areas of 1km squared. As such this covers quite a wide area and was used on a high-level basis in the site assessment process. EA guidance sets out that "The data should not be interpreted as identifying areas where groundwater is actually likely to flow or pond, thus causing flooding, but may be of use to Lead Local Flood Authorities in identifying where, for example, further studies may be useful". As such, we will utilise this information to inform our Strategic Flood Risk Assessment stage 2 which will consider the flood risk on each potential allocation site in more detail. More detail will also be required at the planning application stage whereby a flood risk assessment will be required where development reaches the appropriate threshold.</p> <p>6.11 We are aware that the Environment Agency has issued more recent mapping since the site assessments were completed, during the public consultation. The officer site assessments were completed based on the information available at the time of writing and these will be updated in due course to reflect any changes in information.</p> <p>6.12 – 6.14 The SA assesses the approximate yield likely from each strategic option. The SA is considered to fulfil its purpose and is considered to be proportionate to the information available and the stage of the Local Plan. The SA is an iterative process and will be updated with the required level of detail as the plan moves forward. The Sustainability Framework which sets out the SA objectives was consulted on at the scoping stage and amended as appropriate. It is therefore considered to be suitable.</p> <p>6.15 – 6.16 The Local Plan consultation provided the opportunity for stakeholders, including local residents, to participate in the development of the Local Plan and have an input on its direction. The Council has an</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
		<p>obligation to consider the representations received as well as the available evidence to consider how the Plan should be developed. It should follow an appropriate strategy in order to best meet the needs of the current and future population.</p> <p>6.17 A dwelling is a single unit of residential accommodation. A one bed flat counts as a dwelling, as does a large four bed family home, for example. The potential yield of each site was determine based on the characteristics of the local area and the use of nearby densities.</p>
7. Property value	7.1 Developing areas nearby is likely to reduce property values	7.1 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 material planning consideration we can take into account for the Local Plan, just as it's not for planning applications either. If residents want to make comments on a proposed allocation in future, focus should be on things like the effect on amenity, the existing use of the land, access arrangements and nature conservation, which are all material planning considerations.
8. Viability	<p>8.1 Costly to get rid of the telephone exchanges and would impact on the public purse.</p> <p>8.2 Any policy requirement must be evidenced and justified and shown not to impact on viability.</p> <p>8.3 The Staines -upon-Thames Town Centre expansion and proposed master plan</p>	<p>8.1 These sites have been put forward by the landowners for consideration for development opportunities. The cost to relocate these facilities, if necessary, would be borne by the landowner in order to facilitate the re-development of the site. The Council do not own the telephone exchanges.</p> <p>8.2 – 8.4 The issue is noted by officers and the LPTG to consider further. Further viability work is being undertaken to inform policy development and draft site allocations through later iterations of the Plan</p> <p>8.5 The issue is noted by officers and the LPTG to consider further. The Council will undertake further detailed viability work to inform later stages of the Local Plan process and determining the quantity of affordable</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	<p>would need to consider viability.</p> <p>8.4 Considers that a viability assessment is crucial in understanding viability and therefore the deliverability of the identified sites.</p> <p>8.5 Policy H02 suggests that the Council will expect at least 40% affordable housing in schemes of 10 units or more. Clearly that requirement will need to be justified with appropriate evidence.</p>	<p>housing is a key element of this. This will ensure that the policies and site allocations are based on robust evidence.</p>
9. Employment and Business Issues	<p>9.1 Loss of car parking within Staines will impact on local business</p> <p>9.2 The sites proposed to be allocated for commercial uses near to Heathrow Airport should be intensified.</p> <p>9.3 Consideration of residential and retail/commercial uses on the same site</p> <p>9.4 Support opportunities for new employment and</p>	<p>9.1 The Council acknowledges concerns of businesses that the loss of car parking in the town centre may cause. The redevelopment of Staines will see an increased number of people living within the town centre ensuring a regular footfall of people to use businesses in the area. The Council are seeking to encourage alternative forms of transport to reduce emissions and this could reduce congestion on local roads to allow more visitors to access the town centre. Ensuring the vitality and viability of the town centre is a key element of the Local Plan.</p> <p>9.2 The proposed allocations have been identified and the quantum of development selected following a robust site assessment. The Council will consider the most efficient use of land as per the NPPF where appropriate but must also take into account other factors such as impacts on receptors nearby such as housing. The Council are engaged in regular dialogue with Heathrow Airport as part of the proposed expansion plans.</p>

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
	industrial opportunities in Stanwell and Stanwell Moor	<p>9.3 The Council will consider mixed use developments where these locations are appropriate and taking into account factors such as access, noise generation and proximity to existing commercial areas.</p> <p>9.4 By virtue of their location, Stanwell and Stanwell Moor are impacted upon by Airport-related activity and HGV movements to access the M25. The Council, through Policy SP3 Stanwell and Stanwell Moor, intend to protect the amenity of the residents of these areas from further worsening of these issues.</p>

6. Settlements

6.1 The following section sets out the key issues raised in relation to each area of Spelthorne. These have been considered as follows:

- Staines (Urban)
- Staines and Laleham Green Belt
- Shepperton (Urban)
- Shepperton Green Belt
- Ashford (Urban)
- Ashford and Surrounds Green Belt
- Stanwell (Urban)
- Stanwell Green Belt
- Charlton Village and Waterworks
- Sunbury (Urban)
- Sunbury Green Belt

Staines (Urban)

Staines – Urban area	<p>1.1 Design will be important in high rise and high density development.</p> <p>1.2 Overwhelming level of development proposed in town centre.</p> <p>1.3 Concerns over the concentration and density of development proposed.</p> <p>1.4 Level of development seems disproportionate – people move to Staines to get out of busy London.</p> <p>1.5 How will infrastructure support this level of development?</p> <p>1.6 Staines Bridge is a bottleneck.</p> <p>1.7 Issues at Crooked Billet Roundabout.</p> <p>1.8 Improvements to Two Rivers needed.</p> <p>1.9 Flooding issues.</p>	<p>1.1 The issue is noted by officers and the LPTG to consider further. The Staines Masterplan will set out a cohesive vision for Staines town centre. Developments will need to follow new design policies requiring high quality design and tall buildings will need to be designed to reflect the redefined character of Staines.</p> <p>1.2 - 1.4 The Masterplan for Staines will allow the Council to consider the level of development that can be appropriately accommodated in the town centre and how this can be achieved. We have a challenging housing target derived from Central Government's standard method for calculating housing need. The character of Staines provides the opportunity to consider how high density development could be utilised to help meet our needs. The masterplan will allow us to plan cohesively for Staines town centre, whilst addressing infrastructure issues and illustrating how development could come together.</p> <p>1.5 The Council is currently producing an Infrastructure Delivery Plan (IDP), which will identify the Borough's infrastructure requirements including social, physical and green infrastructure. The IDP will set out what is needed, where it is needed and when it is needed. The Local Plan will then utilise this evidence to ensure that the required infrastructure is in place to support development.</p> <p>1.6 – 1.7 Surrey County Council have undertaken transport modelling of the highway network and of junctions in Spelthorne. No 'severe' impacts were identified which is the NPPF's threshold for resisting development on transport grounds. We will work with the County Council as the highways authority to address adverse impacts and mitigate transport issues that arise through the Local Plan. Planning obligations received at the planning application stage will be used to address local issues.</p> <p>1.8 The issue is noted by officers and the LPTG to consider further. The Staines Masterplan will consider Staines Town Centre, including the Two</p>
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	<p>1.10 Parking concerns in town centre. May put visitors off.</p> <p>1.11 Knock on effects for side roads if parking is not provided in the town centre.</p> <p>1.12 Limited parking already at Staines Health Centre.</p> <p>1.13 Lots of office to flat conversions with vacant units still.</p> <p>1.14 Change to the town's character.</p> <p>1.15 Pollution issues.</p> <p>1.16 No alternative sites proposed for Surrey CC assets.</p> <p>1.17 Local Plan shouldn't be finalised until the Masterplan is ready.</p> <p>1.18 Not enough open space in Staines.</p> <p>1.19 Too many people in Staines already.</p> <p>1.20 Flats won't provide the correct mix of housing.</p>	<p>River Shopping Centre. Officers will engage with landowners as appropriate to consider any proposed changes.</p> <p>1.9 Officers have considered flood risk through the assessment process. Sites within the functional floodplain (flood zone 3b) have been discounted. Due to the constrained nature of Spelthorne, flood zone 3a and 2 need to be considered. A Strategic Flood Risk Assessment stage 2 will be produced in due course to assess the risk on individual sites and options for mitigation. See key theme 'flood risk' for more detail.</p> <p>1.10 – 1.11 Parking will be considered through the Staines Masterplan with a bespoke parking solution anticipated. Whilst we recognise the importance of town centre parking, the Local Plan will seek to encourage sustainable and active modes of travel.</p> <p>1.12 Spelthorne Borough Council will engage with Surrey County Council as the landowner further once allocations are firmed up. This will involve discussing proposals and supporting infrastructure so that services can be maintained. The Council will seek to boost active and sustainable travel whilst maintaining some element on parking where appropriate. It will be for Surrey CC as the landowner and service provider to demonstrate how travel will be addressed through their proposals at the planning application stage with a travel plan to be submitted.</p> <p>1.13 The Government made permanent permitted development rights to allow the conversion of office space to residential use in 2016. Whilst this provides a source of housing supply, the local planning authority has less control over the detail of each scheme and can only consider limited criteria in the decision-making process. Whilst the Council has limited control over these schemes, the Local Plan will allow the Council to plan for Spelthorne in a holistic manner, with housing and employment needs considered amongst other matters.</p> <p>The Council is currently working with consultants to produce evidence to support the Local Plan to consider the housing market position in</p>
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	<p>1.21 Loss of heritage assets.</p> <p>1.22 What will happen to retail units and employees when the shopping area is developed?</p> <p>1.23 Lots of disruption due to current developments – this will get worse.</p> <p>1.24 Reduced views of the River Thames.</p>	<p>Spelthorne and to consider if current units are meeting the needs of the community. This will then inform the Local Plan strategy as we move forward to the next stage of Local Plan preparation.</p> <p>1.14 Through the Government's standard method for calculating housing need we are required to provide over 600 homes each year. Whilst we acknowledge that this will be challenging and will result in some changes to Spelthorne, the Local Plan provides a platform to consider how this development can be delivered. Our preferred spatial strategy aims to only release weakly performing Green Belt, to increase densities where character allows, while the masterplan for Staines will allow us to set out a cohesive vision for the town centre. Development in the town centre will need to follow the masterplan whilst we expect high quality design to be realised so that positive impacts on the environment can be achieved through the Local Plan.</p> <p>1.15 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.</p> <p>More widely the Local Plan allows us to plan holistically and to consider the impacts on wider issues such as pollution and climate change. Individual site assessments for the proposed allocations have considered the effects of air pollution especially in those locations where levels are already high. A draft policy has been included in the new Local Plan to address this and will be applied where necessary for new developments. We will also continue to work proactively with our Environmental health team on pollution and with Surrey County Council who are responsible for transport through the development of the Local Plan to ensure that these matters are suitably considered and addressed on each site.</p> <p>1.16 Spelthorne Borough Council will continue to work with Surrey County Council as the Local Plan enters the next stages of development. Surrey's</p>
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		<p>asset review, which is currently underway, will help to inform how development could be accommodated within the Borough. We will be contacting all landowners where appropriate to discuss the detail of each site and any requirements associated with each allocation.</p> <p>1.17 The issue is noted by officers and the LPTG to consider further. It is anticipated that the masterplan will be completed within the current year and will inform the Regulation 19 Local Plan which is due to be published in early 2021.</p> <p>1.18 The Council is currently producing an Infrastructure Delivery Plan (IDP), which will identify the Borough's infrastructure requirements including social, physical and green infrastructure. This includes open space provision. The Council has also produced an Open Space Assessment (draft, Nov 2019) to set out the current provision of open space and where improvements are required. The Local Plan will provide the platform on which to address any deficiencies identified through its supporting evidence.</p> <p>1.19 Household growth projections which inform housing need calculations are based on sub-national population projections. This means that we have to plan for the projected number of households that will arise based on population changes. The Local Plan provides the opportunity to consider how the needs of the current and future population can be met. We have carried out several evidence base studies so far to consider the capacity of each settlement to accommodate new development. We have also produced transport modelling to consider how future development could impact the road network, whilst we are also producing an Infrastructure Delivery Plan to identify the impacts on infrastructure provision. The Local Plan will utilise this evidence to inform its direction and the level of development to be planned for.</p> <p>1.20 The Strategic Housing Market Assessment update 2019 sets out the housing mix required through the Local Plan. We have taken this into account in the development of draft policy H1: Homes for All, which sets</p>
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		<p>out that a suitable mix of homes will be required in housing schemes. This will allow us to deliver an appropriate mix of types and sizes of units across Spelthorne throughout the plan period to meet the needs of the Borough. Whilst flats may be more suitable in certain locations such as town centres that can accommodate high density development, lower density areas are likely to provide different types of homes more suited to that location. We are currently producing evidence to consider how needs are being met across the Borough which will inform the next stage of the Local Plan.</p> <p>1.21 Surrey County Council have been consulted on all proposed allocation sites and we will engage with them further as the Local Plan progresses and the list of site allocations are firmed up. Surrey have a dedicated Heritage Conservation Team and one of their main roles is to advise on planning proposals for new developments.</p> <p>If a site is taken forward through the Local Plan the landowner will need to submit a planning application for the proposed development. All applications which have the possibility to affect a heritage asset should be accompanied by a statement describing the significance of the heritage asset affected and the contribution of their setting to that significance. The level of detail should be proportionate to the importance of the heritage asset and should be sufficient to understand the potential impact of the proposal on the significance of the heritage asset.</p> <p>Where an application includes, or is considered to have the potential to include, heritage assets with archaeological interest applicants should submit an appropriate desk-based assessment and, where desk-based research is insufficient to properly assess the interest, a field evaluation.</p> <p>1.22 The Council is considering redeveloping the Elmsleigh Centre so that it would retain its retail presence within the town centre, however residential development could be accommodate on the upper floors, above the shopping centre.</p>
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		<p>1.23 We are aware of the temporary disruption that can arise from development.</p> <p>Construction will be a key consideration in the determination of planning applications. This is to ensure that the construction process is sustainable, with regard given to pollution and the transportation of materials. Planning conditions are a mechanism used by local planning authorities to ensure that once planning permission has been granted, developers must fulfil certain requirements. Through planning conditions, Construction Transport Management Plans are often required to set out how materials will be moved and managed in the construction period. This will need to be signed off by the local planning authority to ensure that it is satisfactory and keeps disruption to a minimum.</p> <p>1.24 The Staines Masterplan will look to make a positive contribution to the town centre so that assets can be maximised. As the River Thames is an integral part of the Borough, the Council will seek to improve its setting and use through the Local Plan. The new Local Plan will include a set of policies regarding character, heritage, the River Thames and design to ensure that proposals have due regard to the wider environment and the river itself.</p>
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Staines and Laleham Green Belt

Staines and Laleham Green Belt	<p>1.1 Development should be focused on Brownfield land.</p> <p>1.2 Little consideration given to densities proposed on Green Belt land, particularly on Worple Road and, Berryscroft and Bingham Drive.</p> <p>1.3 Generally infrastructure can simply not cope with increased population and traffic.</p> <p>1.4 No infrastructure plan in place.</p> <p>1.5 Greener infrastructure required.</p> <p>1.6 Loss of community/leisure facilities, for example, Staines and Laleham Sports Club.</p> <p>1.7 Increased flood risk.</p> <p>1.8 Air and noise pollution issues, mainly around Worple Road.</p> <p>1.9 Adverse impact on nature; wildlife and biodiversity</p>	<p>1.1 See key theme 'Green Belt' for more detail. The Council has produced a Strategic Land Availability Assessment (SLAA) to consider brownfield land for development. The SLAA sets out the sites identified in the urban area to meet development needs and an approximate density. Unfortunately, there is not enough capacity in the urban area to deliver over 600 new homes each year, as required by the Government therefore Green Belt is being considered. The Council's preferred spatial strategy for the Local Plan focuses on maximising the number of dwellings in the urban area and on brownfield land, subject to character considerations.</p> <p>Paragraph 137 of the NPPF states that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, local planning authorities should a) make as much use as possible of suitable brownfield sites and underutilised land; b) optimise the density of development. The preferred spatial strategy adheres to this and seeks to boost housing delivery in the urban area and increase densities.</p> <p>1.2 The Council has a challenging housing target derived from Central Government's standard method for calculating housing need. The character of these sites provides the opportunity to consider how high density development could be utilised to help meet our needs.</p> <p>1.3 – 1.5 See the key themes Transport, Health and Education for further detail. The Council acknowledges that increased growth in the Borough will inevitably lead to increased pressures on facilities and services such as transport, education and healthcare. By having a Local Plan in place, this will identify areas which are lacking in facilities and services which can be addressed over the Plan period.</p> <p>The Council is working with Surrey County Council, Schools, GP surgeries and the CCG/NHS England and other infrastructure providers to assess current capacity shortfalls and identify opportunities to meet future demand in these areas.</p>
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	<p>1.10 Negative impacts on health and wellbeing.</p> <p>1.11 Loss of character.</p> <p>1.12 Loss of heritage assets.</p>	<p>Planning obligations received at the planning application stage will be used to address local infrastructure needs. The Local Plan will also utilise evidence from the impending IDP to ensure that the required infrastructure is in place to support development.</p> <p>1.6 All schemes that involve a loss of social facility will be subject to re-provision. This will either be on the existing site as part of a mixed use scheme or in an alternative suitable location within close proximity.</p> <p>With regards to Staines and Laleham Sports Club, the club itself has promoted the land for development as they view this as the most appropriate way of being able to fund improvements to the current facilities. It is not proposed that the sports club will no longer use the site however this would see some of the site being lost to for housing. The sports club would however remain with improved facilities.</p> <p>1.7 The Council has considered flood risk throughout the assessment process. Sites within the functional floodplain (flood zone 3b) have been discounted. Due to the constrained nature of the borough, flood zone 3a and 2 need to be considered. A Strategic Flood Risk Assessment stage 2 will be produced in due course to assess the risk on individual sites and options for mitigation. See key theme 'flood risk' for more detail.</p> <p>1.8 See the key Pollution theme for more detail. The Council has given consideration to especially air and noise through the Sustainability Appraisal, which assesses social, economic and environmental impacts. We will be holding discussions with landowners where appropriate following the current consultation to determine how adverse impacts can be mitigated. The Local Plan will largely allow the Council to plan holistically and to consider the impacts on wider issues such as pollution and climate change.</p> <p>1.9 -1.10 See key 'biodiversity' and, Leisure and Open Spaces themes for more information. The Council's draft Policy E4 (Green and Blue Infrastructure) will seek a net gain in biodiversity at the planning</p>
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		<p>application stage and will also seek to enhance on site green infrastructure where possible.</p> <p>The Council will continue to protect and enhance open spaces and to encourage the use of them as part of wider health and wellbeing strategies. Where open spaces have been identified for a development, draft Policy E5 (Open Spaces) will require that compensatory measures are made to mitigate their loss either through on-site re-provision or providing a financial contribution to improve their quality significantly close by the development site.</p> <p>1.11 The Council's preferred spatial strategy aims to only release weakly performing Green Belt, to increase densities where character allows, while the masterplan for Staines will allow us to set out a cohesive vision for the town centre. Development of Green Belt sites in Staines will need to fulfil this strategy whilst we expect high quality design to be realised so that positive impacts on the environment can be achieved through the Local Plan.</p> <p>1.12 Surrey County Council has been consulted on all proposed allocation sites and the Council will engage with them further as the Local Plan progresses and the list of site allocations are firmed up. SCC has a dedicated Heritage Conservation Team and one of their main roles is to advise on planning proposals for new developments. All applications which have the possibility to affect a heritage asset will have to be accompanied by a statement describing the significance of the heritage asset affected and the contribution of their setting to that significance. The level of detail will have to be proportionate to the importance of the heritage asset and will have to be sufficient to understand the potential impact of the proposal on the significance of the heritage asset.</p>
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Shepperton (Urban)

Shepperton - Urban	<p>1.1 Impacts of development on traffic and the local road network.</p> <p>1.2 Lack of health facilities.</p> <p>1.3 Lack of school places.</p> <p>1.4 Local bus service is poor and trains into London are too infrequent.</p> <p>1.5 Developers will not pay to fund infrastructure.</p> <p>1.6 Loss of youth centre.</p>	<p>1.1 Surrey County Council have undertaken transport modelling for the new Local Plan. This assesses the impacts of new development on the road network and junctions. By allocating sites through the Local Plan we can consider the bigger picture and plan so that adverse impacts that arise as a result of multiple developments can be overcome. This allows us to address any highways impacts in a holistic manner in collaboration with Surrey CC as the highways authority and developers, with planning obligations also providing a means to address issues. The transport modelling has not identified that the Council's preferred options for development will cause impacts which are 'severe', which is the NPPF's threshold for rejecting development on highway grounds. Suitable infrastructure will be required as allocations materialise and planning applications are submitted to show that cumulative impacts have been considered in terms of both pollution and transport.</p> <p>1.2 See the Health theme for further detail. The Council are working with GP surgeries and the CCG/NHS England to identify current capacity and expected future demands for healthcare.</p> <p>1.3 See the education key theme for further details. The Council are in discussions with schools and Surrey County Council to identify opportunities for expansions to increase school places and to determine where there is available capacity.</p> <p>1.4 We will be working on an ongoing basis with Surrey County Council as the highway authority and service providers to help address shortfalls in public transport. The Local Plan provides the opportunity to boost active and sustainable travel and this will be a key consideration as we move forward with Local Plan preparation. Planning obligations at the planning application stage may be used to help fund transport infrastructure, whilst developments may be required to make appropriate contributions to local transport. The IDP will set out the transport needs for the Borough and this will help us to address deficits through the Local Plan. We are also engaged with South Western railways to establish if improvements can be</p>
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		<p>made either to the number of services provided or the capacity for increasing the number of carriages on each service.</p> <p>1.5 The Council is currently producing an Infrastructure Delivery Plan (IDP), which will identify the Borough's infrastructure requirements including social, physical and green infrastructure. The IDP will set out what is needed, where it is needed and when it is needed. The Local Plan will then utilise this evidence to ensure that the required infrastructure is in place to support development. Developers are required to enter into s106 agreements and pay money through the Community Infrastructure Levy (CIL) to help to fund infrastructure improvements to mitigate the potential impacts of the development when a planning application is approved. Development cannot start until these agreements are in place.</p> <p>1.6 Spelthorne Borough Council will continue to work with Surrey County Council as the Local Plan enters the next stages of development. The youth centre in Shepperton is owned by SCC and further discussions are required to establish whether re-provision should be on site or relocated elsewhere as part of a larger social and community hub. All schemes that involve a loss of social facility will be subject to re-provision. This will either be on the existing site as part of a mixed use scheme or in an alternative suitable location within close proximity.</p>
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Shepperton Green Belt

Shepperton Green Belt	<p>1.1 Close proximity to M3 will cause noise and air pollution.</p> <p>1.2 Flooding issues.</p> <p>1.3 Potential access issues and increase in traffic.</p> <p>1.4 Destruction of the character of Shepperton.</p> <p>1.5 Negative impacts on Ash Link Nature Reserve and wildlife.</p> <p>1.6 Shepperton has already had to accommodate the Eco Park and the Shepperton Studios expansion.</p> <p>1.7 Local health and education infrastructure won't be able to cope.</p> <p>1.8 Sustainability of allocation site locations.</p> <p>1.9 Shepperton is full.</p> <p>1.10 Proposed densities are too high.</p> <p>1.11 Impacts of local settings, outlook and amenity/ privacy</p>	<p>1.1 See 'Environmental Pollution' section for more detail. We have carried out a Sustainability Appraisal for all sites to assess the social, economic and environmental impacts of development, including on pollution and air quality. Part of this process is to identify where development could have a negative impact on any of the SA objectives and to subsequently identify mitigation measures. If the site is allocated within the Local Plan, developers will need to demonstrate that any issues can be overcome.</p> <p>At the planning application stage applicants will need to adhere to all of the Local Plan policies, including draft policy E3: Environmental Protection. This sets out the steps that applicants will need to follow in order to address noise and air pollution. Applicants will also need to submit an Air Quality Assessment which will assess air quality associated with transport volumes, waste disposal, construction etc. A noise impact assessment will also consider noise impacts and potential mitigation. This could include mitigation such as sound insulation, a suitable buffer or screening of gardens, for example. This will then give the case officer a greater level of understanding with regards to the impacts of the proposed scheme. We will also continue to work with our Environmental health team who monitor pollution via diffusion tubes on a monthly basis around the Borough.</p> <p>1.2 See 'Flooding' section for more detail. Spelthorne is a very constrained Borough therefore we have to look at land in flood zone 2 and 3a. We will be working with Surrey County Council as the lead local flood authority and we will be producing a strategic flood risk assessment stage 2 in due course to assess the risk on individual sites and to consider the options for mitigation.</p> <p>Applicants will also need to submit a flood risk assessment when submitting a planning application to consider the flood risk to a site. This will need to demonstrate that applicants have sufficiently considered and taken steps to manage flood risk as part of the development proposal.</p>
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	<p>of surrounding properties and businesses.</p> <p>1.3 The Council followed a robust site selection methodology, underpinned by the Sustainability Appraisal to determine which sites should be taken forward as potential allocations. Road and highway concerns were considered and influenced decision-making.</p> <p>As more detail is considered through the next stage of the Local Plan, the Council will engage with landowners and Surrey County Council to identify potential access issues and suitable measures to overcome these.</p> <p>At the planning application stage developers will be required to submit a transport assessment and a travel plan which will consider the road impacts and identify where a positive contribution can be made to improving road safety.</p> <p>Where applicable, planning obligations paid by developers will be used to secure improvements to the local area such as road and safety enhancements.</p> <p>1.4 We would expect any new development to be of high quality design and this will be informed by the new Local Plan policies. The planning application stage of the process which comes after the adoption of the Local Plan will consider character in more detail.</p> <p>We are required to build over 600 homes per annum by Government therefore we are likely to see an increase in built form across the Borough. We aim to maximise densities where character allows, for example in high density areas like town centres and near to transport hubs, but we will seek to ensure that new developments across the wider area adhere to local character. Applicants will need to demonstrate that this has been taken into account through their planning application.</p> <p>1.5 See key theme 'biodiversity' for more detail. The Sustainability Appraisal for the Local Plan Preferred Options sets out where negative impacts are expected on biodiversity. Biodiversity impacts on the site and on the surrounding area will need to be considered in more detail at the planning application stage to show how adverse impacts can be mitigated to an acceptable level.</p>
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		<p>Our new draft policy 'E4: Green and Blue Infrastructure' seeks to make a positive contribution to biodiversity and seeks a net gain in biodiversity. Biodiversity net-gain is an approach which aims to leave the natural environment in a measurably better state than beforehand. This approach has been included as part of the Government's Draft Environmental (Principles and Governance) Bill 2018. Biodiversity net gain will be sought on sites where existing green assets can be improved or enhanced or where these are lost, such as on greenfield sites, proposed development will provide significant replacements.</p> <p>We will be updating the Spelthorne Biodiversity Action Plan this year which will set out Spelthorne's commitment to conserve and enhance biodiversity. It will contain actions to improve habitats and species in the Borough. This will also help us to improve the proportion of local sites with positive conservation management.</p> <p>1.6 & 1.8 The preferred spatial option for the Local Plan aims to disperse development across Spelthorne, with a mix of urban and Green Belt sites. The identified Green Belt sites were chosen due to their weak contribution to the Green Belt purposes set out in the NPPF. The sustainability of each site was also a consideration in the decision-making process, with those neighbouring the urban area preferred due to their links to local services.</p> <p>Transport modelling was produced by Surrey County Council to consider the impacts of the Local Plan on the road network and junction across Spelthorne. This took into account previous planning permissions granted, such as the Shepperton Studios expansion and the Eco park, to set a baseline and to consider how additional development may have an impact. The transport modelling results did not identify 'severe' impacts, which is the NPPF's threshold for rejecting development on highway grounds, subject to mitigation to improve affected routes and junctions. More technical work will be undertaken to provide the level of detail required to support individual sites.</p> <p>Officers will engage further with infrastructure providers and Surrey County Council through the next stage of the Local Plan to address infrastructure -</p>
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		<p>provision and to ensure that a suitable amount of development can be accommodated in each area.</p> <p>1.7 See key themes on 'Health' and Education'. The Council acknowledges that increased growth in the Borough will inevitably lead to increased pressures on services such as healthcare and education. 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. We are working with infrastructure providers so they can plan for our future growth. Healthcare and education will be dealt with through the Infrastructure Delivery Plan (IDP) which will support the Local Plan. The IDP identifies the Borough's infrastructure requirements, 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 is currently being progressed following the Preferred Options consultation.</p> <p>1.9 Central Government requires us to build over 600 homes each year which we feel is a challenging target. Despite this, we still need to consider how we can best meet the future needs of the community. The Local Plan provides a platform on which we can plan for future growth in a holistic manner, bringing together site allocations for different types of development and supporting infrastructure across Spelthorne. Without a Local Plan in place we face more ad hoc development, without the necessary infrastructure to support this. Through the Local Plan we can plan for growth across Spelthorne in a sustainable way, with the needs of the existing and expanding community addressed. Our preferred spatial strategy aims to disperse development across the Borough with a mix of urban and weakly performing Green Belt sites, with higher density development where character allows. We will work with infrastructure providers and developers to plan for growth in Shepperton in a sustainable manner.</p> <p>1.10 The local plan will provide detail of each site allocation, including requirements and the level of development expected. This will be determined by the surrounding character and the nature of each site.</p>
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Ashford (Urban)

	<p>1.1 Local traffic issues</p> <p>1.2 Increased pressure on health services in Ashford</p> <p>1.3 Increasing development for the centre of Ashford</p> <p>1.4 Too much development concentrated here</p> <p>1.5 Too many flats in the area</p> <p>1.6 Loss of multi-storey car park on Church Road</p> <p>1.7 Lack of parking options close to the town centre</p> <p>1.8 Development should be more evenly spread across the Borough</p> <p>1.9 Impacts of loss of social and community facilities</p> <p>1.10 Impacts of increased air pollution</p> <p>1.11 Public transport is not an alternative to the car</p>	<p>1.1 Surrey County Council have undertaken transport modelling for the new Local Plan. This assesses the impacts of new development on the road network and junctions. By allocating sites through the Local Plan we can consider the bigger picture and plan so that adverse impacts that arise as a result of multiple developments can be overcome. This allows us to address any highways impacts in a holistic manner in collaboration with Surrey CC as the highways authority and developers, with planning obligations also providing a means to address issues. The transport modelling has not identified that the Council's preferred options for development will cause impacts which are 'severe', which is the NPPF's threshold for rejecting development on highway grounds. Suitable infrastructure will be required as allocations materialise and planning applications are submitted to show that cumulative impacts have been considered in terms of both pollution and transport.</p> <p>1.2 See key theme 'Health' for more detail. The Council are in discussions with infrastructure providers to meet the demands of 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. We recognise the importance of adequate infrastructure for both existing and proposed development. The Council is currently producing an Infrastructure Delivery Plan which will look at all aspects of infrastructure, such as health care, and will also factor in our growth projections. This study will identify what infrastructure will be needed in Sunbury and we will be able to provide further details of these improvements after the IDP has been completed.</p> <p>1.3 The spatial strategy for the Local Plan includes higher densities for brownfield sites within urban areas. The centre of Ashford provides a suitable location for this approach as there are opportunities to re-use brownfield land for development to ensure efficient use of land as required by the National Planning Policy Framework (NPPF). The Site Selection Methodology included an assessment of 'Landscape Character and Townscape' at stage 2b. Here officers assessed the impact of</p>
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		<p>development on the wider environment. In addition, the Sustainability Appraisal framework also includes objectives 7 and 8 which address townscape and landscape character. All sites have been assessed against these criteria and were deemed to have acceptable impacts, subject to appropriate mitigation. Character will need to be considered further at the planning application stage whereby applicants will need to demonstrate that policies have been complied with. Draft policy SP2: Ashford, Shepperton and Sunbury Cross sets out that proposals will be supported that protect and enhance the local character of the area, whilst draft Policy DS1: Place Shaping focusses on positive contributions to local character.</p> <p>1.4 - 1.5 Spelthorne's Core Strategy from 2009 required us to build 166 homes per annum, whilst our Strategic Housing Market Assessment 2015 indicated that Spelthorne has a need for 552-757 homes per annum. More recently the standard method for calculating housing need sets out that we need to provide 603 homes each year. We therefore face the challenge of meeting these needs across Spelthorne and must consider the capacity of each settlement to help meet these needs.</p> <p>As Spelthorne does not have an up to date Local Plan, planning applications have been submitted on an ad hoc basis in recent years, with no up to date allocations and supporting infrastructure plan to guide development in a holistic manner. The Local Plan will provide the opportunity to plan for Spelthorne in a holistic manner and will enable us to consider what infrastructure is needed in each area to support development. This will allow for a more joined up plan-led approach to development in Spelthorne. We will be expected to show that we have left no stone unturned in planning to meet our development needs in Spelthorne. As such the capacity of each settlement needs to be considered. The Council is currently producing an Infrastructure Delivery Plan (IDP) to set out what infrastructure is required in each part of Spelthorne to support Local Plan development.</p> <p>1.6 A number of parking surveys have been carried out and these have found the multi-storey car park to be under-utilised. The site itself is on</p>
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		<p>brownfield land and within a town centre therefore is a sustainable location for housing. Some parking will be retained on the site as a result of the development proposals.</p> <p>1.7 Ashford is a local centre which seeks to meet the day to day needs of people living within the local area. This should encourage people to walk to use the facilities provided given the relatively close proximity its main users live to the centre. The Council are in discussions with Surrey County Council to consider options for improving existing parking or to re-model it to allow a greater use of space for parking.</p> <p>1.8 As noted above, the Council must plan for at least 603 homes per year for the next 15 years. In order to do this, we must consider all sites within all locations so as to 'leave no stone unturned'. Therefore, we have assessed all available land opportunities in Staines and Ashford, Shepperton and Sunbury. Some of these areas are more heavily constrained than others or have fewer development opportunities.</p> <p>1.9 All schemes that involve a loss of social facility will be subject to re-provision. This will either be on the existing site as part of a mixed use scheme or in an alternative suitable location within close proximity. The Council will continue to work with Surrey County Council to address any shortfall in social and community facilities. The IDP will consider Spelthorne's current provision and needs with the level of development proposed through the Local Plan. We will then be able to consider how this can be addressed through the Local Plan.</p> <p>1.10 The Sustainability Appraisal which considers air quality impact through the site assessment process makes a high level judgement regarding the potential for adverse impact from new development and any mitigation measures that could be used to overcome this. This Preferred Options stage of the Local Plan is largely about determining if the principle of development on each site would be suitable or if there are any adverse impact that could not be overcome. The detail will come</p>
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		<p>after the current consultation and we will be holding discussions with landowners to go over any local impacts.</p> <p>At the planning application stage the applicant will need to adhere to all of the Local Plan policies, including draft policy E3: Environmental Protection, and will need to submit an Air Quality Assessment which will assess air quality associated with transport volumes, waste disposal, construction etc. This will then give us a greater level of understanding with regards to the impacts of the proposed scheme.</p> <p>1.11 We will be working on an ongoing basis with Surrey County Council as the highway authority and service providers to help address shortfalls in public transport. The Local Plan provides the opportunity to boost active and sustainable travel and this will be a key consideration as we move forward with Local Plan preparation. Planning obligations at the planning application stage may be used to help fund transport infrastructure, whilst developments may be required to make appropriate contributions to local transport. The IDP will set out the transport needs for the Borough and this will help us to address deficits through the Local Plan.</p>
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Ashford and Surrounds Green Belt

	<p>1.1 Too much development is proposed in the area</p> <p>1.2 Loss of Green Belt land to development.</p> <p>1.3 Green Belt should be protected and brownfield land should be prioritised.</p> <p>1.4 Loss of character</p> <p>1.5 Negative impacts on the environment.</p> <p>1.6 Roads won't be able to cope with new development.</p> <p>1.7 Concerns over safety with more activity</p>	<p>1.1 Officers have followed a robust site selection methodology to determine which sites should be taken forward as potential allocations. The Council has decided to pursue a combination approach to focus on brownfield sites, increased densities where appropriate, releasing some weakly performing Green Belt and a masterplan for Staines upon Thames. The proposed allocations are considered to fulfil this strategy and provides a spread of development across the Borough to meet the Government's challenging housing requirement. Central government have set out that we must follow a standard method to calculate housing need, with a target of over 600 homes per annum for Spelthorne. We therefore need to consider how this level of need can be met across the Borough. We will continue to work with service providers and Surrey County Council to meet the infrastructure needs of the population as it grows. The Local Plan allows us to plan holistically and consider a range of impacts into the future. The Local Plan provides the opportunity to identify areas which are lacking in services and other social facilities which can be addressed over the Plan period.</p> <p>1.2 See key theme 'Green Belt' for more detail. Green Belt sites have been considered suitable for development where they are 'weakly performing' in the Green Belt Assessment (GBA) stage 1. This is the case with Ashford Manor Golf Course (site ref: AE1/003). In the case of the land at Chattern Hill (site ref: AE3/009) and land to the east of the Sports Club on Woodthorpe Road (site ref: AT1/003), these parcels were identified for further consideration in stage 2 of the GBA. It was determined that both parcels could be released without harming the integrity of the wider Green Belt.</p> <p>1.3 See key theme 'Green Belt' for more detail. Officers have produced a Strategic Land Availability Assessment (SLAA) to consider brownfield land for development. Unfortunately, there is not enough capacity in the urban area to meet development needs therefore Green Belt is being considered.</p>
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		<p>the site allows us to consider the bigger picture and to subsequently plan so that adverse impacts can be overcome.</p> <p>Any planning application would need to demonstrate that highways issues can be overcome, so whilst the detail would be considered at this latter stage, we can start to work with the County Council at this early stage to determine what infrastructure is required to support the allocations.</p>
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Stanwell (Urban)

Stanwell urban area	<p>1.1 Too much development concentrated in the area especially on Clare Road.</p> <p>1.2 Too many flats in the area, particularly on Clare Road.</p> <p>1.3 Increased pressure on road network due traffic and congestion.</p> <p>1.4 Public transport options are limited.</p> <p>1.5 Demand for car parking spaces due to increase exponentially as a result of the Brooklands site.</p> <p>1.6 Loss of character coupled with declining street scene.</p> <p>1.7 Pollution concerns.</p> <p>1.8 Heathrow expansion-related impacts.</p>	<p>1.1 The Council followed a robust site selection methodology to determine which sites to take forward as potential allocations. The proposed allocations are considered to fulfil the Council's strategy and provide a spread of development across the Borough to meet the Government's challenging housing target. Central government have set out that we must follow a standard method to calculate housing need, with a target of over 600 homes per annum for Spelthorne. Therefore, we need to consider how this level of need can be met across the Borough.</p> <p>We will continue to work with service providers and Surrey County Council to meet the infrastructure needs of the population as it grows. The Local Plan allows us to plan holistically and consider a range of impacts into the future. The Local Plan also provides the opportunity to identify areas which are lacking in services and other social facilities which can be addressed over the Plan period.</p> <p>1.2 The Strategic Housing Market Assessment update 2019 sets out the housing mix required through the Local Plan. We have taken this into account in the development of draft policy H1: Homes for All, which sets out that a suitable mix of homes will be required in housing schemes. This will allow us to deliver an appropriate mix of types and sizes of units across Spelthorne throughout the plan period.</p> <p>1.3 Surrey County Council has undertaken transport modelling for the new Local Plan. This assesses the impacts of new development on the local road network. Allocating the site allows us to consider the bigger picture and to subsequently plan so that adverse impacts can be overcome.</p> <p>At the planning application stage, the developer will be required to submit a transport assessment and a travel plan to consider the road impacts and identify where a positive contribution can be made to improving road safety. Also, planning obligations can be paid by the developer to contribute to improvements in the local area, such as road and safety enhancements.</p>
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		<p>We will give more consideration to the detail of each site identified for potential allocation following the consultation. This will include discussions with the landowner to discuss potential impacts on the wider area and any mitigation measures that may be required.</p> <p>1.4 The Council is currently producing an Infrastructure Delivery Plan (IDP) which will identify the Borough's infrastructure requirements including social, physical and green infrastructure. The IDP will set out what is needed, where it is needed and when it is needed. Therefore, the IDP will set out the transport needs for the Borough and this will help us to address deficits through the Local Plan. The Local Plan will then utilise this evidence to ensure that the required infrastructure is in place to support development. Developers are required to enter into s106 agreements and pay money through the Community Infrastructure Levy (CIL) to help to fund infrastructure improvements to mitigate the potential impacts of the development when a planning application is approved. Development cannot start until these agreements are in place.</p> <p>We are also working with Surrey County Council as the highway authority and other service providers to help address shortfalls in public transport. The Local Plan provides the opportunity to boost active and sustainable travel and this will be a key consideration as the Local Plan preparation progresses. Planning obligations at the planning application stage could be used to help fund transport infrastructure, whilst developments could be required to make appropriate contributions to local transport.</p> <p>1.5 The Council is working with Surrey County Council as a Highways Authority and other infrastructure providers to establish where capacity genuinely exists and areas of greatest demand to ensure car parking spaces are available where appropriate over the Local Plan period.</p> <p>As part of the Council's on-going work on the IDP, we are engaging with Surrey County Council to ascertain opportunities for expanding and improving car parking where appropriate.</p>
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		<p>1.6 New development will need to take account of local character and reference will need to be made to design policies within the Local Plan at the planning application stage. Regard will need to be given to design and the wider environment.</p> <p>The Site Selection Methodology included an assessment of 'Landscape Character and Townscape' at stage 2b. Here officers assessed the impact of development on the wider environment. In addition, the Sustainability Appraisal framework also includes objectives 7 and 8 which address townscape and landscape character. All sites have been assessed against these criteria and were deemed to have acceptable impacts, subject to appropriate mitigation. Character will need to be considered further at the planning application stage whereby applicants will need to demonstrate that policies have been complied with. Draft policy SP3: Stanwell and Stanwell Moor sets out that the Council will support preserve and enhance the local character of the area, whilst draft Policy DS1: Place Shaping focusses on positive contributions to local character.</p> <p>1.7 Please refer to the Pollution theme for further details. More details on the impacts of pollution will come after the current consultation and we will be engaging with the relevant landowners to go over any of the impacts. Aside the transport modelling, the Infrastructure Delivery Plan and our Sustainability Assessment amongst other supporting evidence, the Council will continue to work proactively with Surrey County Council through the development of the Local Plan to ensure that these matters are appropriately considered and addressed for individual sites.</p> <p>1.8 Please refer to the Heathrow theme for further details. Due to the uncertainty surrounding the expansion at Heathrow, the Council is unable to comment further on the potential impacts of the proposed scheme until the ANPS has either been revised or renewed and Heathrow's proposals are deemed compatible with the requirements set out in the document.</p>
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Stanwell Green Belt

	<p>1.1 Development could result in urban sprawl and the merging of settlements.</p> <p>1.2 Oppose the development of Green Belt land, particularly for Gypsy and Traveller pitches (Land to the west of Town Lane) and Commercial purposes (Land at Northumberland Close).</p> <p>1.3 Choosing Green Belt sites is profit driven.</p> <p>1.4 Green Belt needs to remain Green Belt</p> <p>1.5 Green Belt plays an important role in Climate Change.</p> <p>1.6 Too much development is proposed here</p> <p>1.7 Loss of open spaces</p> <p>1.8 Adverse impacts on wildlife and biodiversity</p> <p>1.9 Noise and air pollution, particularly from Heathrow</p>	<p>1.1 See key theme 'Green Belt' for more detail. Local areas and smaller sub areas were assessed through the Green Belt Assessment stage 1 and 2 against the Green Belt purposes set out in the NPPF. One or more criteria was developed for each purpose using both qualitative and quantitative measures and a score out of five was attributed to each criterion. Any sub area scoring relatively weakly, weakly or very weakly (score of 1 or 2) across all NPPF purposes was judged to be weak Green Belt. Any sub area scoring strongly or moderately (score of 3-5) against any of the purposes was deemed to play a role and was judged to be moderate or strong Green Belt. The identified potential allocation sites followed the GBA2 recommendations, therefore the release of the identified parcels is not considered to result in risk to the potential merging of settlements or sprawl.</p> <p>1.2 See key theme 'Green Belt' for more detail. Green Belt sites have been considered suitable for development where they are 'weakly performing' in the Green Belt Assessment (GBA). Land to the west of Town Lane (site ref: SN1/015) and Land at Northumberland Close (site ref: SN1/005) could be released without harming the integrity of the wider Green Belt.</p> <p>The site at Northumberland Close was promoted for economic development by the landowner. The Council identified the site for commercial use to support growth at Heathrow Airport through the officer site assessment process. The area around Northumberland Close is characterised by a number of large storage and distribution units which play an important economic role for Spelthorne in supporting the operation of Heathrow Airport. For this reason the site is considered to be more appropriate for commercial use.</p> <p>1.3 Through the examination of the Local Plan the Council will be expected to demonstrate that it has left no stone unturned in meeting its housing needs. At present Spelthorne is unable to meet all of its housing needs within the urban area alone therefore a strategy including weakly</p>
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	<p>1.10 Loss of outlook and privacy</p> <p>1.11 Limited car parking spaces especially along Northumberland Close and in Cleveland Park</p>	<p>performing Green Belt has been considered as the preferred option. Moving forward, we will take account of the representations received to our consultation to further develop our strategy. We will continue to review the proposed allocations as well as supporting evidence before concluding on our allocation sites.</p> <p>1.4 See key theme 'Green Belt' for more detail. The Green Belt Assessment focuses on the NPPF purposes and the strategic function of Green Belt. Whilst Green Belt does hold some environmental value by its nature, these factors are not primary to the fundamental aims of Green Belt which is to prevent urban sprawl by keeping land permanently open. Environmental impacts have been considered through the Sustainability Appraisal (SA) and will be further considered through the next SA stages as the Local Plan progresses.</p> <p>1.5 Climate change must be a consideration that runs through the Local Plan so whilst we don't have a Climate Change policy specifically, our Plan when read as a whole seeks to positively address Climate Change, for example through addressing flood risk, improved biodiversity, sustainable construction and the creation of sustainable places. Draft 'Policy DS2: Sustainable Design and Renewable/Low Carbon Energy Generation' can be considered one of the more practical policies in terms of addressing Climate Change, however all policies were assessed against the Climate Change objective as set out in the Sustainability Appraisal framework in order to ensure that the most sustainable option was chosen and adverse impacts can be mitigated. All potential allocation sites were also assessed against the SA framework to consider any adverse impacts on Climate Change. It is the role of the SA to highlight these and identify where improvements can be made to reduce these impacts.</p> <p>1.6 The Council is required to build over 600 homes per annum by Government therefore we are likely to see an increase in built form across the Borough. We aim to maximise densities where character allows, for example in high density areas like town centres and near to transport hubs, but we will seek to ensure that new developments across the wider</p>
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		<p>area adhere to local character. Applicants will need to demonstrate that this has been taken into account through their planning application.</p> <p>1.7 The Council has published an Open Space Assessment which identifies areas which are deficient in open space provision. Where there is deficiency, the Council will seek to address this through the Local Plan process. The Council agrees that the loss of recreation grounds and parks would be detrimental, and these are protected under the NPPF. Where open spaces have been identified for development, draft Policy E5 requires that compensatory measures are undertaken to mitigate the loss either through re-providing the one space on site or providing a financial contribution to improve significantly an open space close by the development site.</p> <p>1.8 Refer to key theme 'biodiversity' for more information. Our draft Policy 'E4: Green and Blue Infrastructure' will seek a net gain in biodiversity where a proposal will impact biodiversity. The Council will also seek to enhance on site green infrastructure where possible. If this is not feasible, a financial contribution will be sought in exceptional circumstances. All proposals at the planning application stage will need to have regard to this policy. The Council will be updating the Spelthorne Biodiversity Action Plan this year which will set out the Council's commitment to conserve and enhance biodiversity. It will contain actions to improve habitats and species in the Borough. This will also help us to improve the proportion of local sites with positive conservation management.</p> <p>1.9 Refer to key theme 'Pollution' for more information. The Council has carried out a Sustainability Appraisal for all sites to assess the social, economic and environmental impacts of development, including on air and noise pollution. Part of this process is to identify where development could have a negative impact on any of the SA objectives and to subsequently identify mitigation measures. The detailed officer assessment sets out the reasons behind the identification of the site.</p>
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		<p>1.10 The officer site assessments considered visual amenity impacts from public viewpoints to consider how outlook could potentially be impacted by development. It should however be noted that there is no 'right to a view' and a loss of a view is not a material planning consideration. The assessment of visual amenity is not an absolute constraint and while due regard has been given to visual impact it has been weighed against other assessment criteria in order to identify potential development sites. We have also sought to take this into account to help mitigate adverse impacts as much as possible.</p> <p>Whilst the planning system cannot protect the view from a property, outlook is considered to be an important consideration. This occurs where development would have an adverse overbearing effect. This matter would be considered at the planning application stage.</p> <p>1.11 The Council is working with Surrey County Council as a Highways Authority and other infrastructure providers to establish where capacity genuinely exists and areas of greatest demand to ensure car parking spaces are available where appropriate over the Local Plan period.</p> <p>As part of the Council's on-going work on the IDP, we are engaging with Surrey County Council to ascertain opportunities for expanding and improving car parking where appropriate.</p>
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Charlton Village and Waterworks

	<p>1.1 85% increase in homes is disproportionate.</p> <p>1.2 The Eco Park development has had negative impacts on wildlife and traffic.</p> <p>1.3 Worsening air quality.</p> <p>1.4 Loss of a “buffer” between M3 - Eco Park, Shepperton Studios expansion and existing housing. The land is an important environmental barrier to pollution from Charlton Road Eco Park, the M3, Shepperton Studios expansion and the overloaded Charlton Road.</p> <p>1.5 Loss of views in relation to LS1/007</p> <p>1.6 Development of Charlton village would result in merging with Ashford Common and Littleton.</p> <p>1.7 The inclusion of these sites is contrary to the Green Belt review.</p>	<p>1.1 The Council are seeking to meet the identified need for home over the plan period. The Local Plan Preferred Options consulted on aimed to meet Spelthorne’s housing needs by releasing some weakly performing Green Belt, intensifying development in urban areas and by producing a masterplan for Staines. Two sites close to Charlton Village were identified as weakly performing and there were no overriding constraints so they were taken forward for consultation.</p> <p>1.2 The comments are noted by officers and the LPTG to consider further. The Eco Park is constructed and beyond the scope of the new Local Plan.</p> <p>1.3-1.4 The whole of Spelthorne is an Air Quality Management Area (AQMA) and this is an important issue for the Local Plan to address. The individual officer assessments for each proposed allocations considered the effects of air pollution in areas in borough with poor air quality below EU standards.</p> <p>All the allocated sites were assessed against the Sustainability Appraisal framework including air pollution and identified its adverse impacts on the environment and subsequently recommended mitigation measures. Check the Council’s website for the detailed officer assessments which set out the reasons for specific allocations.</p> <p>The Council’s Environmental teams are also actively involved in capturing air quality data via additional monitoring stations to assist in managing air quality improvements.</p> <p>Draft Policy E3: Environmental Protection has been included in the emerging Local Plan to address air pollution and will be applied where necessary to all new developments at the planning application stage. The Council will also ensure that proposals in the AQMA are consistent with the requirements set out in local air quality action plan</p>
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	<p>1.8 The Bugle Nurseries site should be developed.</p> <p>1.9 Development would result in unacceptable harm to the rural character of the area.</p> <p>1.10 Sites are not sustainable.</p> <p>1.11 Development would result in negative impacts on biodiversity.</p> <p>1.12 LS1/020 should be planted as a municipal wood.</p> <p>1.13 Increased pressure on sewerage.</p> <p>1.14 Mains water pressure is extremely low.</p> <p>1.15 Lack of infrastructure to support the proposed levels of growth.</p> <p>1.16 Very limited bus service and residents have little option but to use cars.</p> <p>1.17 Charlton Road is inadequate at its junction with Charlton Lane, given the requirement for an improved junction as part of</p>	<p>All development proposals will need to be accompanied by Air Quality Assessments which will assess the potential impacts of air quality associated with additional vehicular movements on both our local and strategic road network as well as other issues such as waste disposal and construction. This will then give us a greater level of understanding with regards to the impacts of the proposed scheme.</p> <p>1.5 See key theme 'Visual Impacts'.</p> <p>1.6 -1.10 See key theme 'Green Belt' for more detail. Green Belt sites have been considered suitable for development where they are 'weakly performing' in the Green Belt Assessment (GBA) stage 1.</p> <p>1.11-1.12 The Sustainability Appraisal for the Local Plan Preferred Options sets out where negative impacts are expected on biodiversity. This will need to be considered in more detail at the planning application stage to show how adverse impacts can be mitigated to an acceptable level.</p> <p>Our new draft policy 'E4: Green and Blue Infrastructure' seeks to make a positive contribution to biodiversity and seeks a net gain in biodiversity. Biodiversity net-gain is an approach which aims to leave the natural environment in a measurably better state than beforehand. This approach has been included as part of the Government's Draft Environmental (Principles and Governance) Bill 2018. Biodiversity net gain will be sought on sites where existing green assets can be improved or enhanced or where these are lost, such as on greenfield sites, proposed development will provide significant replacements.</p> <p>We will be updating the Spelthorne Biodiversity Action Plan this year which will set out Spelthorne's commitment to conserve and enhance biodiversity. It will contain actions to improve habitats and species in the Borough. This will also help us to improve the proportion of local sites with positive conservation management.</p>
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	<p>the Shepperton Studios expansion.</p> <p>1.18 A new roundabout at the junction of Charlton Road and Charlton Lane as part of the Shepperton Studios Expansion, may compromise capacity so needs mitigation.</p> <p>1.19 Safety issues along Charlton Road.</p> <p>1.20 Lack of site specific studies carried out.</p> <p>1.21 Loss of sites will mean a loss for community use e.g. horse and dog shows.</p> <p>1.22 The stables and horses and an important part of the village.</p> <p>1.23 Surface water flooding and drainage are issues for the village.</p> <p>1.24 Loss of flood storage land will make flooding worse.</p> <p>1.25 LS1/020 - area liable to flood as a direct result of flooding from the River Ash.</p>	<p>1.13-1.14 As the organisation responsible for sewerage in the bough Thames Water are a Specific Consultation body and are consulted at each stage of Plan preparation to ensure they have no objections to sites or overall number of homes allocated in the Local Plan.</p> <p>1.15 Please see Key Themes Health, Education and Transport.</p> <p>1.16-1.20 The Council acknowledges that future growth will inevitably lead to increased pressures on infrastructure. By having a Local Plan in place, this will identify areas which are lacking in infrastructure which can be addressed over the Plan period.</p> <p>Please see Key Theme Transport, particularly Local and Strategic Road Network</p> <p>1.21-1.22 Officers recognise that site owners have allowed members of the public informal use of greenfield sites over a number of years. If sites have a public right of way through them this will be retained as part of new development however if this is not the case it is the goodwill of the owner that has allowed this. Officers note the value the community place on the Horse and Dog Shows.</p> <p>1.23-1.25 Each allocated in the emerging Plan will be subject to a site specific flood risk assessment (FRA) where required. These will be undertaken by AECOM who have undertaken the Strategic Flood Risk Assessment.</p> <p>Please refer to Key Theme Flooding for further detail.</p> <p>1.26 Surrey CC will be consulted at all stages of plan preparation and there will be detailed and ongoing engagement with many departments including waste, education and highways.</p>
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	<p>The western end of the site is shown to be within the 1 in 100 flood plain, the remaining area of the land is totally within the 1 in 1000 flood plain.</p> <p>1.26 Concerns over close proximity to existing and safeguarded waste sites – this could threaten the operation of the existing waste facility.</p>	
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Sunbury Urban

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
Sunbury – Urban area	<p>1.1 Traffic issues, particularly at Sunbury Cross Roundabout and A308.</p> <p>1.2 Increased pressure on Sunbury Health Centre</p> <p>1.3 Loss of character of Lower Sunbury.</p> <p>1.4 Lots of development in the past in Sunbury.</p> <p>1.5 Too much development concentrated here.</p> <p>1.6 Loss of businesses with office to residential conversions.</p> <p>1.7 Too many flats in the area.</p> <p>1.8 Loss of social and community facilities negative.</p> <p>1.9 Existing roads are narrow and may not cope.</p> <p>1.10 Public transport options are poor.</p>	<p>1.1 Surrey County Council have undertaken transport modelling for the new Local Plan. This assesses the impacts of new development on the road network and junctions. By allocating sites through the Local Plan we can consider the bigger picture and plan so that adverse impacts that arise as a result of multiple developments can be overcome. This allows us to address any highways impacts in a holistic manner in collaboration with Surrey CC as the highways authority and developers, with planning obligations also providing a means to address issues. The transport modelling has not identified that the Council's preferred options for development will cause impacts which are 'severe', which is the NPPF's threshold for rejecting development on highway grounds. Suitable infrastructure will be required as allocations materialise and planning applications are submitted to show that cumulative impacts have been considered in terms of both pollution and transport.</p> <p>1.2 See key theme 'Health' for more detail. The Council are in discussions with infrastructure providers to meet the demands of our future growth. By having a Local Plan in place, this will identify areas which are lacking in services and social facilities which can be addressed over the Plan period. We recognise the importance of adequate infrastructure for both existing and proposed development. The Council is currently producing an Infrastructure Delivery Plan which will look at all aspects of infrastructure, such as health care, and will also factor in our growth projections. This study will identify what infrastructure will be needed in Sunbury and we will be able to provide further details of these improvements after the IDP has been completed.</p> <p>1.3 The Site Selection Methodology included an assessment of 'Landscape Character and Townscape' at stage 2b. Here officers assessed the impact of development on the wider environment. In addition, the Sustainability Appraisal framework also includes objectives 7 and 8 which address townscape and landscape character. All sites have</p>

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	1.11 Lack of youth facilities.	<p>been assessed against these criteria and were deemed to have acceptable impacts, subject to appropriate mitigation. Character will need to be considered further at the planning application stage whereby applicants will need to demonstrate that policies have been complied with. Draft policy SP2: Ashford, Shepperton and Sunbury Cross sets out that proposals will be supported that protect and enhance the local character of the area, whilst draft Policy DS1: Place Shaping focusses on positive contributions to local character.</p> <p>1.4 – 1.5 The Spelthorne Strategy from 2009 required us to build 166 homes per annum, whilst our Strategic Housing Market Assessment 2015 indicated that Spelthorne had a need for 552-757 homes per annum. More recently the standard method for calculating housing need sets out that we need to provide 603 homes each year. We therefore face the challenge of meeting these needs across Spelthorne and must consider the capacity of each settlement to help contribute to housing provision.</p> <p>As Spelthorne does not have an up to date Local Plan, planning applications have been submitted on an ad hoc basis in recent years, with no up to date allocations and supporting infrastructure plan to guide development in a holistic manner.</p> <p>The Local Plan will provide the opportunity to plan for Spelthorne in a holistic manner and will enable us to consider what infrastructure is needed in each area to support development. This will allow for a more joined up plan-led approach to development in Spelthorne.</p> <p>We will be expected to show that we have left no stone unturned in planning to meet our development needs in Spelthorne. As such the capacity of each settlement needs to be considered. The Council is currently producing an Infrastructure Delivery Plan (IDP) to set out what infrastructure is required in each part of Spelthorne to support Local Plan development.</p>

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		<p>1.6 The Government made permanent permitted development rights to allow the conversion of office space to residential use in 2016. Whilst this provides a source of housing supply, the local planning authority has less control over the detail of each scheme and can only consider limited criteria in the decision-making process. Whilst the Council has limited control over these schemes, the Local Plan will allow the Council to plan for Spelthorne in a holistic manner, with housing and employment needs considered amongst other matters.</p> <p>1.7 The Strategic Housing Market Assessment update 2019 sets out the housing mix required through the Local Plan. We have taken this into account in the development of draft policy H1: Homes for All, which sets out that a suitable mix of homes will be required in housing schemes. This will allow us to deliver an appropriate mix of types and sizes of units across Spelthorne throughout the plan period.</p> <p>1.8 All schemes that involve a loss of social facility will be subject to re-provision. This will either be on the existing site as part of a mixed use scheme or in an alternative suitable location within close proximity.</p> <p>1.9 Surrey County Council have undertaken transport modelling for the new Local Plan. This assesses the impacts of new development on the road network. Allocating the site allows us to consider the bigger picture and to subsequently plan so that adverse impacts can be overcome. Planning obligations can be paid by the developer to contribute to improvements in the local area, such as road and safety enhancements. We will give more consideration to the detail of each site identified for potential allocation following the consultation. This will include discussions with the landowner to discuss potential impacts on the wider area and any mitigation measures that may be required.</p> <p>At the planning application stage, the developer will be required to submit a transport assessment and a travel plan to consider the road impacts and</p>

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		<p>identify where a positive contribution can be made to improving road safety.</p> <p>1.10 We will be working on an ongoing basis with Surrey County Council as the highway authority and service providers to help address shortfalls in public transport. The Local Plan provides the opportunity to boost active and sustainable travel and this will be a key consideration as we move forward with Local Plan preparation. Planning obligations at the planning application stage may be used to help fund transport infrastructure, whilst developments may be required to make appropriate contributions to local transport. The IDP will set out the transport needs for the Borough and this will help us to address deficits through the Local Plan.</p> <p>1.11 The Council will continue to work with Surrey County Council to address any shortfall in social and community facilities. The IDP will consider Spelthorne's current provision and needs with the level of development proposed through the Local Plan. We will then be able to consider how this can be addressed through the Local Plan.</p>

Sunbury Green Belt

KEY THEMES	ISSUES RAISED	OFFICER'S RESPONSE
Sunbury – Green Belt	<p>1.1 Too much development is proposed in the area.</p> <p>1.2 Green Belt should be protected and brownfield land should be prioritised.</p> <p>1.3 Increased flood risk.</p> <p>1.4 Loss of character.</p> <p>1.5 Sunbury is overpopulated.</p> <p>1.6 Negative impacts on the environment.</p> <p>1.7 Negative impacts on wildlife and nature, particularly in relation to Stratton Road.</p> <p>1.8 Negative impacts on heritage assets.</p> <p>1.9 Roads won't be able to cope with new development.</p> <p>1.10 Trees should be planted on sites to improve air quality, rather than development.</p> <p>1.11 Loss of views.</p>	<p>1.1 Officers have followed a robust site selection methodology to determine which sites should be taken forward as potential allocations. The Council has decided to pursue a combination approach to focus on brownfield sites, increased densities where appropriate, releasing some weakly performing Green Belt and a masterplan for Staines upon Thames. The proposed allocations are considered to fulfil this strategy and provides a spread of development across the Borough to meet the Government's challenging housing target.</p> <p>1.2 See key theme 'Green Belt' for more detail. Officers have produced a Strategic Land Availability Assessment (SLAA) to consider brownfield land for development. Unfortunately there is not enough capacity in the urban area to meet development needs therefore Green Belt is being considered.</p> <p>1.3 Officers have considered flood risk through the assessment process. Sites within the functional floodplain (flood zone 3b) have been discounted. Due to the constrained nature of Spelthorne, flood zone 3a and 2 need to be considered. A Strategic Flood Risk Assessment stage 2 will be produced in due course to assess the risk on individual sites and options for mitigation. See key theme 'flood risk' for more detail.</p> <p>1.4 The officer site assessment has addressed character through stage 2b and the SA. At the planning application stage new development will need to take account of local character and reference will need to be made to design policies within the Local Plan at the planning application stage. Regard will need to be given to the wider environment and local context.</p> <p>1.5 Central Government have set out that we must follow a standard method to calculate housing need, with a target of over 600 homes per annum for Spelthorne. We therefore need to consider how this level of need can be met across the Borough. We will continue to work with</p>

	<p>1.12 Concerns over safety with more activity.</p> <p>1.13 Disruption in the construction phase.</p> <p>1.14 Support that Kempton Park has been discounted from consideration.</p> <p>1.15 Kempton Park should be further considered as an allocation.</p>	<p>service providers and Surrey County Council to meet the infrastructure needs of the population as it grows. The Local Plan allows us to plan holistically and consider a range of impacts into the future. The Local Plan provides the opportunity to identify areas which are lacking in services and other social facilities which can be addressed over the Plan period.</p> <p>1.6 – 1.7 See key theme 'biodiversity' for more information. Our new policy 'E4: Green and Blue Infrastructure' will seek a net gain in biodiversity and will also seek to enhance on site green infrastructure where possible. If not feasible, a financial contribution will be sought in exceptional circumstances. Any planning application for this site will need to have regard to this policy. We will be updating the Spelthorne Biodiversity Action Plan this year which will set out Spelthorne's commitment to conserve and enhance biodiversity. It will contain actions to improve habitats and species in the Borough. This will also help us to improve the proportion of local sites with positive conservation management.</p> <p>1.8 Surrey County Council have been consulted on all of our proposed allocation sites and we will engage with them more as the Local Plan progresses and we have firmed up our list of site allocations. Surrey have a dedicated Heritage Conservation Team and one of their main roles is to advise on planning proposals for new developments.</p> <p>If the site is taken forward through the Local Plan the landowner will need to submit a planning application for the proposed development. All applications which have the possibility to affect a heritage asset should be accompanied by a statement describing the significance of the heritage asset affected and the contribution of their setting to that significance. The level of detail should be proportionate to the importance of the heritage asset and should be sufficient to understand the potential impact of the proposal on the significance of the heritage asset.</p> <p>Where an application includes, or is considered to have the potential to include, heritage assets with archaeological interest applicants should</p>
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7. Next Steps

- 7.1 The Council will be considering the consultation feedback in developing its Publication Local Plan to be consulted on at the next stage of plan preparation, in accordance with the Local Development Scheme² timetable. This preparation process will also be guided by a Sustainability Appraisal to ensure our Local Plan meets key environmental, social and economic objectives.
- 7.2 Moving forward officers will consider a range of options to meet the Borough's development needs and will present these options to a cross-party Local Plan Task Group. [The Local Plan Task Group will re-examining both the site allocations and policy wording and will make recommendations to the Council's Cabinet.](#) Cabinet will also be advised on how the Council may progress with the Local Plan, with the final Local Plan strategy and selection of sites to be decided by members. Following the final stage of consultation the Local Plan will be submitted to the Planning Inspectorate for an Examination in Public. Those who respond to the final stage of consultation may ask to attend the Examination and raise they concerns with the Inspector. The Inspector will produce a report which states whether the Plan is sound or not and any changes needed to make it Sound. Members will then decide whether to adopt the Local Plan as Council policy.

² <https://www.spelthorne.gov.uk/localplan>