



Kwasi Kwarteng MP  
Via Email

Contact: Cllr Lawrence Nichols  
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Date: 23 November 2021

Dear Mr Kwarteng

On August 9<sup>th</sup> 2021 you wrote to Daniel Mouawad, Cllr Boughtflower and myself in regards to the increasing alarm amongst residents about the Councils draft plans for meeting the current annual housing target of 611. You helpfully suggested that a small cross party working group was set up to draft a case for you to tackle with the appropriate parliamentary colleagues.

The current process for formulating the Spelthorne Local Plan is in danger of ruining the borough by requiring the building of too many new homes over the next 15 years. The current target of more than 600 new homes per year will require that we either allow a large number of developments of 12 or 14 floors in Staines, or that we build on our limited Green Belt. Either approach will inevitably change the character of Spelthorne in ways that are completely unacceptable to large numbers of residents. Spelthorne is being required to create this plan as a consequence of the policies of central government, and it is only with a reduction in the numbers expected by the DLUHC that this situation can be avoided.

The standard calculation of housing numbers fails to recognise the unique circumstances of Spelthorne, in particular the exceptional amount of water which limits the scope for building. Spelthorne is a small borough, comprising only 5118 hectares. At present 65% of the borough is Green Belt, equating to a total of 3,324 hectares. Of this Green Belt area, some 1,098 hectares are covered by waterbodies. A further 458 hectares are in use for approved purposes, such as mineral extraction and waste management.

As you will be aware Spelthorne lies within the Thames Valley and parts of the Borough are liable to flooding from the Rivers Thames, Colne and Ash. Flood risk means that properties and land can be subject to flooding. Any land or building which may be at risk of flooding is subject to restrictive planning policies on what may be built.

There are also the strategically significant reservoirs which cover huge areas and provide water to much of West London. Both these features add greatly to the character of the area, but they place severe limitations on both housing development and the necessary infrastructure.

In addition, Spelthorne has the real and significant risk from groundwater and surface water restricting opportunities for development (i.e. not just from the Thames and the reservoirs). This was seen earlier this year in Stanwell, Sunbury, Guildford Street and a small number of properties on Wheatsheaf in Staines.

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The restrictions presented by the geography of the borough have determined the way that the built-up areas have developed. All the suitable areas have been developed over the years, with the exception of those parts which are protected by the Green Belt designation. The current demands from central government cannot be accommodated without going high-rise or removing the Green Belt designation on some tracts of land. Both of these options are being fiercely objected to by local residents, who see their local environment being sacrificed to the benefit of greedy developers.

The National Planning Policy Framework (NPPF) is very clear on the role and value of Green Belt and that changes to its extent should only be considered where there is a definite “need”. The basis of the “need” for housing in Spelthorne has been derived from 2014 figures, however the most recent ONS numbers (April 2019) show the population of Spelthorne stood at an estimated 99,925, representing a 1% rise from the 2016 figures when the LEA was last compiled. The recently published ‘*Local Economic Assessment 2021*’ (Spelthorne Borough Council) shows a projected population growth rate up to 2043 for the whole borough to 101,600. This rate is much slower than previously predicted.

We feel that there is a very strong case for the DLUHC to accept that Spelthorne should be allowed to prepare a Local Plan using a lower target figure that reflects our unique circumstances (see Appendix A) and the slower population growth rate. We would ask you to use your influence as an MP to get this special situation recognised and accepted.

Yours sincerely,

Councillor Nichols, Leader Spelthorne Borough Council

Cllr Boughtflower, Leader Conservative Group

Cllr Beardsmore, Chair of the Environment and Sustainability Committee

Cllr Mooney, Staines South

## Appendix A

1. What is the total area of Spelthorne?

**Total area of Spelthorne is 5118 hectares**

2. How much of that is Green Belt

**The Green Belt in Spelthorne covers 3,324 hectares which equates to 65% of the total area of the Borough**

3. How much water? Include immediate banks and embankments but nothing else

**3a. Spelthorne as a whole – Area of Spelthorne covered by waterbodies 1102.60 hectares**

**3b. Green only – Area of Green Belt in Spelthorne covered by waterbodies is 1098.23 hectares**

4. How much Brownfield Use Of GB? Especially including waste/water/mineral industries. Developed environment, active mineral extraction and existing Grants (eg. watersplash Farm)

**Green Belt only – 458.28 hectares (this figure covers brownfield land within Green Belt in Spelthorne)**

**NB: Mineral working sites are temporary and will be restored eventually.**

5. Sport & Recreation Racing, Golf Football, School playing fields. Sports Assoc etc. Not fishing lakes as they should be captured above

**5a. Spelthorne as a whole – Sports and recreation land (Open Space Assessment) total area in Spelthorne is 1964.29 hectares**

**5b. Green only – Sports and recreation land (Open Space Assessment) total area in Spelthorne in the Green Belt is 1811.78 hectares**

6. Flood Plain 3a NOT in Green Belt –

**Total area of Spelthorne designated as flood zone 3a outside of the Green Belt is 143.61 hectares**

7. Count of properties at high risk of flooding by neighbouring Boroughs.

Borough	PFRA 2017 Risk of flooding from surface water	PFRA 2017 Risk of flooding from rivers and sea	PFRA 2017 Combined river and surface water risk	Properties at risk of flooding from Rivers and Sea 2021
Spelthorne	286	4728	4989	5466
Runnymede	1076	8996	9174	8280
Elmbridge	2080	2863	4649	4348

We have included the PFRA 2017 numbers which were based on the EA National Receptors Database 2014 and the EA National mapping criteria used for the PFRA 2017 update. We have also included the latest 2021 EA properties at risk of flooding from rivers and sea which includes all postal properties. The numbers are different as there have been changes to the flood zones and it includes all postal addresses.

**Table 2.** Proportion of flood zone risk, surface water risk and EA historic flood map by Borough.

Borough	Floodzone 3 %	Floodzone 2 %	Surface water: 1 in 100 %	EA Historic Flood Map %
Spelthorne	20.1	41.3	2.0	25.3
Runnymede	18.2	27.5	5.0	20.4
Elmbridge	10.8	22.3	5.6	26.1

The table above summarises the proportion of flood risk and historic mapping by Borough.

**Table 3.** Reported property flooding by Borough.

Borough	Reported property floods
Spelthorne	193
Runnymede	1558
Elmbridge	320