

## Briefing to Environment & Sustainability Committee – 8 November 2022

I'm providing a verbal update on the progress of the Local Plan as we prepare to submit to the Secretary of State by the end of November 2022. I will arrange for this information to be circulated following the meeting. It wasn't available to provide in advance as we are making progress daily so this is the most up to date position as of today.

### Respondents

A total of 370 people or bodies have responded to the consultation, which amounts to 861 individual comments (708 on policies and the Plan as a whole, 153 on proposed allocation sites). This number has dropped from the approximately 1200 comments initially reported as we've since stripped out multiple duplicates. We are still occasionally finding further duplicates as we go through the analysis so the figures reported here are still provisional.

The people and bodies who have responded are summarised as follows:

Type of respondent	Number of respondents
Individuals	289
Organisations (including RAs)	19
Agents acting for developers/interested parties	35
Local Authorities	7
Councillors (Spelthorne and County)	20
<b>Total</b>	<b>370</b>

The types of respondent are not 100% accurate as the consultation portal requires people to self-identify what category they fall under, so for example someone may be representing an organisation but has identified as an individual. We have done a manual sift of the obvious ones and moved them to the correct type of respondent in this summary.

At the request of Members at the Committee meeting, the list of councillors who responded is as follows:

- Attewell
- Barnard
- C. Barratt
- R. Barratt
- Beardsmore
- Beecher
- Boughtflower
- Brar
- Buttar
- Chandler
- Gething
- Harman
- I. Harvey
- Howkins

- Islam
- Leighton
- Mitchell
- Mooney
- Rybinski
- Saliagopoulos
- Sider
- Weerasinghe (County)

The vast majority of these Member responses were made in respect of Local Green Space, to put forward additional sites in their ward or support sites already identified for designation.

### Comments on overall strategy and policies

In terms of the individual comments, the highest numbers were against the following policies:

Issue	Number of comments
Evidence and general comments	73
Policy ST2 – Planning for the Borough	162
Policy PS1 – Responding to the climate emergency	66
Policy SP1 – Staines upon Thames	32
Policy SP4 – Green Belt*	19
Policy H1 – Homes for All	24
Policy E5 – Open Space and Recreation	139
Policy ID1 – Infrastructure and Delivery	33

\*Green Belt policy for the new Local Plan rather than sites proposed for release from the Green Belt, which are either dealt with under ST2 or the relevant allocation reference

### Site allocations

None of the individual site allocations received more than 10 comments each. Comments that objected to certain sites not being included in the Plan, known as ‘omission sites’, were counted as comments against the spatial strategy policy at ST2. By far the two omission sites that received the most comments were Kempton Park and the Running Horse, both in Sunbury. Kempton Park received 12 and the Running Horse received 27. Other than one support comment each from the respective developers, all were objections to these sites being allocated and were received mainly from individuals and some Spelthorne councillors and a county councillor. These comments were simply noted as the sites are not included in the Local Plan but effectively they support the strategy without these sites in it and it will be for the examination to consider arguments from the developers for their inclusion, although further response has been provided against the comments seeking their inclusion to explain why the sites were not selected for allocation.

I will now take the opportunity to provide some detail on some of the key policies that have received the majority of responses and how we are responding to them.

### Policy ST2 – Planning for the Borough

This policy covers the spatial strategy for the Borough, including the approach to delivering homes to meet our housing need, how we will support economic growth, provision for Gypsies, Travellers, and setting out our priorities in respect of sustainable travel, climate change and biodiversity net gain. Most of the comments received that address the strategy

and approach of the Local Plan, how we will meet our need, including whether we should meet housing need in full and which sites were selected for allocation, fall within this policy for analysis, which is now complete. The responses are separated and grouped into key themes then sub issues are identified and each receive an officer response.

Against this policy the most popular key themes raised in representations were as follows:

1. Overall objection to the spatial strategy in respect of aiming to meet our Objectively Assessed Need in full, particularly for housing and the use of the standard methodology rather than using our own methodology and/or more up to date household growth projections. Additional related points on impact on infrastructure, the environment, flooding, and adverse effect on Staines due to high rise development. Development should be spread fairly across the Borough

We received representations that covered some or all of these points from 18 individuals, community interest groups, including residents associations, and a councillor.

2. Objection to any release of Green Belt

We received representations from 24 individuals and a councillor. A sub issue was that many respondents also objected to loss of any open space and referred to the new Local Green Space designation

3. Overall objection that the spatial strategy will not deliver sufficient homes to meet need, including specific housing mix, affordable units, older people's accommodation and unmet need from neighbouring authorities.

We received representations from 16 developers, landowners, the Home Builders Federation. The majority of developers and landowners are promoting omission sites in the Green Belt and their representations in some cases run to nearly 100 pages in length

4. Overall support for the spatial strategy.

We received representations from five individuals and developers. The developers represent sites proposed for allocation.

5. Support for the strategy on the basis that two sites in the Green Belt are not proposed for release and allocation, as referenced above, namely Kempton Park and the Running Horse

6. Five local authorities submitted representations to the consultation, raising a variety of issues but no objections. There were Elmbridge, Runnymede, Guildford, Windsor & Maidenhead and Surrey. We also received comments from key stakeholders including the Environment Agency.

The officer responses to the objections to the strategy set out the reasons why the strategy was selected and that it is underpinned by evidence on housing need, other needs such as employment and for provision of Gypsies and Travellers and constraints affecting the Borough. It also points respondents to the Sustainability Appraisal to show how the strategy performs against environmental, social and economic factors, which all need to be balanced when deciding on the approach to take forward. It explains that by releasing a small amount of Green Belt that does not perform any public recreation purpose and by meeting our housing need in full we have been able to include the zoning proposals for Staines to help

maintain the character of the most sensitive areas of the town, which we would not be able to achieve if we were not meeting our need figure. Furthermore, the Green Belt release allows for provision of a new 6<sup>th</sup> form college, a replacement community centre and enhancement of sports facilities for the community. Officers have also responded to the calls for further Green Belt release by explaining that delivering homes over and above our own housing need would have unacceptable impacts on infrastructure and traffic levels, losing some of our most strategically important areas of Green Belt and that exceptional circumstances do not exist to outweigh this harm. The conclusion of officers in light of the representations received is that the strategy remains sound and fit for submission. This will allow for these issues to be considered at examination and those who raised them will have the opportunity to put their points directly to the inspector.

### **Policy SP1 – Staines upon Thames**

Most of the comments received objecting to the level of development proposed in Staines are covered in the spatial strategy policy previously discussed as they relate to the overall housing delivery and distribution across the Borough. However, specific comments about the zoning are dealt with here under Policy SP1. There was general support from a total of five individuals and developers for Staines to be the focus for new development and growth, plus promotion of specific sites and the opportunities to improve cycling and walking infrastructure and public open spaces. Five individuals and residents associations raised concerns over the size and type of units likely to be delivered in Staines, which is addressed in the comments against the spatial strategy policy. Other concerns relate to infrastructure provision and traffic congestion, which have been responded to in detail, with reference to the Infrastructure Development Plan and the Transport Assessment respectively. A number of the 32 total comments against this specific policy concerned the issue of zoning and the majority were against a limitation on heights and densities in Staines. These objections came from two councillors, one individual and a developer. A residents association supported the principle of zoning but considered it to be too loosely worded and objected to the potential for exceptions to the policy. The officer response explains the rationale for the policy, including the exception, setting out that policies need to be positively prepared and provide a degree of flexibility to respond to individual planning merits in order to be found sound by the inspector. Again, those who have responded either for or against the policy will have the opportunity to discuss these issues at the examination.

### **Policy E5 – Open Space and Recreation**

This is the policy that includes the new Local Green Space designation, which was the subject of a separate consultation for green spaces in the Borough to be put forward for additional protections due to their importance to the community or local significance. These were then subject to formal assessment together with all existing Protected Urban Open Land sites, which is the designation that will be removed in the new Local Plan as it affords less protection than national policy. The list of sites was then agreed by the Local Plan Task Group for inclusion in the Local Plan and the assessment work has already been published. Most of the comments are suggesting additional sites for the Local Green Space designation. A total of 111 representations were received on this issue, comprising 91 individuals and 20 Spelthorne and County councillors. Analysis and responses to the comments raised is still progressing and the additional sites put forward are undergoing further assessment.

## **Current progress**

Analysis of the representations has been divided up between officers in the Strategic Planning team on a policy basis and while some have been completed the work continues on the remaining policies. However, all the representations have been read and processed. Some people have included in their comments that they think the Local Plan is unsound, the reasons for their opinion and how the wording of a policy could be improved to make it sound. Officers have then used their professional judgement to consider whether the policy would be improved and where officers agree with the respondent, which is usually on technical matters raised by a relevant statutory body, they will pass on these suggestions to the inspector before the Local Plan is examined. Where a soundness issue has been raised over the strategy itself and the approach of the Local Plan as a whole, it will be for the inspector to consider as the issue can't be resolved with a small change to the wording of a policy, for example. Other than minor corrections that the Chair and Vice Chair of this committee will agree and which we'll also circulate to all Members afterwards, nothing will be changed in the Plan for submission as it will be for the inspector to review the suggested improvements and listen to the views of the person or body who made them if they choose to appear at the hearings. This is the usual process of Local Plan preparation. The professional view of officers is that there are no issues or concerns over the strategy or individual policies that prevent submission of the Local Plan by the end of November 2022 and despite the significant amount of work being undertaken we remain on track for this date.

All the responses will be made public at the time of submission and we will inform all councillors, together with links and information on how everything can be viewed. This will include the schedule of policies where the key themes and sub issues have been collated and responded to by officers, plus a full alphabetical list of all the respondents and their representations in full. These documents will be provided to the inspector so that they can read and consider every comment from every respondent, not just the summary of themes and the officer response. Those who have indicated their wish to appear at the examination will then have the opportunity to raise their comments with the inspector at the hearing sessions but the issues will still be addressed even if none of the respondents raising them opts to appear.

We will continue to update all councillors and the public of the progress following submission, and publicise the website we are setting up that will be devoted to the examination, including all the relevant documents, the timeline for examination and further information that will be updated during this process. The next step after submission will be the appointment of our inspector, which can take up to three weeks. We will then discuss dates for the examination with the Planning Inspectorate, and as previously advised we expect the hearings to commence in March or April 2023.

**Ann Biggs, Strategic Planning Manager**

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