



*Please reply to:*

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Date: 17 January 2023

## **Notice of meeting**

### **Extraordinary Environment and Sustainability Committee**

**Date:** Tuesday, 31 January 2023

**Time:** 7.00 pm

**Place:** Council Chamber, Council Offices, Knowle Green, Staines-upon-Thames TW18 1XB

#### **To the members of the Environment and Sustainability Committee**

Councillors:

I.J. Beardsmore (Chairman)	A. Brar	V.J. Leighton
R.J. Noble (Vice-Chairman)	T. Fidler	S.C. Mooney
R.O. Barratt	N.J. Gething	L. E. Nichols
M. Beecher	K.M. Grant	O. Rybinski
J. Button	K. Howkins	J.R. Sexton

Substitute Members: Councillors M.M. Attewell, J.R. Boughtflower, J.T.F. Doran,  
C. Bateson, M. Gibson, H. Harvey, I.T.E. Harvey,  
N. Islam, T. Lagden, D. Saliagopoulos and  
S.J Whitmore

*Councillors are reminded that the Gifts and Hospitality Declaration book will be available outside the meeting room for you to record any gifts or hospitality offered to you since the last Committee meeting.*

**Spelthorne Borough Council, Council Offices, Knowle Green**

**Staines-upon-Thames TW18 1XB**

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# Agenda

Page nos.

**1. Apologies and Substitutes**

To receive any apologies for absence and notification of substitutions.

**2. Disclosures of Interest**

To receive any disclosures of interest from councillors in accordance with the Council's Code of Conduct for members.

**3. Ward Issues**

To consider any issues raised by ward councillors in accordance with Standing Order 34.2

**4. Questions from members of the Public**

The Chair, or his nominee, to answer any questions raised by members of the public in accordance with Standing Order 40.

**5. Local Plan Update and Implications of Revised National Planning Policy Framework**

**3 - 42**

To consider the implications of proposed changes to the National Planning Policy Framework on the submitted Local Plan.

**6. Spelthorne Borough Council's Proposed Response to Government Consultation on Changes to the National Planning Policy Framework**

**To Follow**

To consider Spelthorne Borough Council's proposed response to the government's consultation on changes to the National Planning Policy Framework.

# Local Plan Update and Implications of Revised NPPF



Spelthorne Takes Shape

**Local Plan Task Group**  
**23 January 2023**

# Local Plan update

- 25 November 2022 – Local Plan submitted to Secretary of State for examination
- 5 December 2022 – Letter from Michael Gove MP (followed by written statement) setting out changes to planning system and that a consultation will be published before Christmas
- 16 December 2022 – Inspector appointed to examine Spelthorne Local Plan
- 22 December 2022 – Consultation commences on revised NPPF, including indicative track changed version. This will run until 2 March 2023, with changes adopted in April 2023

# Michael Gove letter – 5 Dec 2022

## Michael Gove

The Rt Hon Michael Gove is the Conservative MP for [Surrey Heath](#), and has been an MP continuously since 5 May 2005. He currently holds the Government posts of Minister for Intergovernmental Relations, and Secretary of State for Levelling Up, Housing and Communities.



  
Department for Levelling Up,  
Housing & Communities

Rt Hon Michael Gove MP  
Secretary of State for Levelling up Housing &  
Communities  
Minister for Intergovernmental Relations  
2 Marsham Street  
London  
SW1P 4DF

To: all MPs

5 December 2022

Dear Colleague,

### LEVELLING UP & REGENERATION BILL: PLANNING AND LOCAL CONTROL IN ENGLAND

I am writing to set out the further changes I will be making to the planning system, alongside the Levelling Up and Regeneration Bill. They will place local communities at the heart of the planning system.

I will set out the following approach in the upcoming National Planning Policy Framework prospectus, which will be put out for consultation by Christmas.

#### COMMUNITY CONTROL

First, while I will retain a method for calculating local housing need figures, I will consult on changes. I recognise that there is no truly 'objective' way of calculating how many homes are needed in an area, but I do believe that the plan-making process for housing has to start with a number. This number should, however, be an advisory starting point, a guide that is not mandatory. It will be up to local authorities, working with their communities, to determine how many homes can actually be built, taking into account what should be protected in each area - be that our precious Green Belt or national parks, the character or an area, or heritage assets. It will also be up to them to increase the proportion of affordable housing if they wish.

My changes will instruct the Planning Inspectorate that they should no longer override sensible local decision making, which is sensitive to and reflects local constraints and concerns. Overall this amounts to a rebalancing of the relationship between local councils and the Planning Inspectorate, and will give local communities a greater say in what is built in their neighbourhood. For example, when assessing a local plan, the following will have to be taken into account:

- Genuine constraints: local planning authorities will be able to plan for fewer houses if building is constrained by important factors such as national parks, heritage restrictions, and areas of high flood risk.
- Green Belt: further clarifying our approach to date in the National Planning Policy Framework and the Localism Act, we will be clear that local planning authorities are not expected to review the Green Belt to deliver housing. This is in line with commitments made by the Prime Minister in the Summer.
- Character: local authorities will not be expected to build developments at densities that would be wholly out of character with existing areas or which would lead to a significant change of character, for example, new blocks of high-rise flats which are entirely inappropriate in a low-rise neighbourhood. While more homes are needed in many existing urban areas, we must pursue 'gentle densities' as championed by the Building Better, Building Beautiful Commission. The Bill's provisions for mandatory design codes, which will have the same legal force as the local plan, will give authorities a powerful tool to guide the forms of development that communities wish to see.

# Michael Gove letter

## What did he say and what does it mean?

- **The housing need figure is a starting point and not mandatory**

**This has not changed**, although in practice it has always been very difficult to justify departing from the standard method at Examination

- **Genuine constraints: local planning authorities will be able to plan for fewer houses if building is constrained by important factors such as national parks, heritage restrictions, and areas of high flood risk.**

**This has not changed** but, again, has proved difficult to justify at Examination. Existing NPPF text says at Para. 11:

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

# Michael Gove letter

- **It will be made clear that local planning authorities are not expected to review the Green Belt to deliver housing**

**This has not changed.** The current NPPF does not require review of Green Belt to meet housing need but offers the opportunity to do so through demonstration of Exceptional Circumstances (which Spelthorne considers exist in relation to our Local Plan)

- **Local authorities will not be expected to build developments at densities that would be wholly out of character with existing areas or which would lead to a significant change of character, for example, new blocks of high-rise flats which are entirely inappropriate in a low-rise neighbourhood.**

**This has not changed.** The existing NPPF at Para. 125 says:

a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate [This could include where a development would be significantly out of character with the prevailing area]

# Michael Gove letter

- **End to the need for a five-year rolling housing supply where plans are up to date**

This reduces the pressure on local authorities with plans adopted in the last five years. Instead a four-year supply will be required.

- **The Presumption in favour of sustainable development and the ‘tilted balance’ will not apply in relation to land supply**

This applies to plans adopted within the last five years or are at Regulation 18 or 19, or recently submitted. The presumption could still apply depending on the level of planning permissions granted each year.

- **Removal of 20% buffer on housing supply**

This reduces the amount of homes needed in the five-year housing land supply. There is still a need to pass the Housing Delivery Test which measures delivery against need over the past three years



# Michael Gove letter

- **Brownfield first approach reiterated and review announced into identifying measures that would prioritise the use of brownfield land**

Appears to strengthen existing focus but it has always been the case that use of brownfield sites should be exhausted before considering Green Belt release

- **For those areas that would like to bring forward their own method for assessing housing needs, it will be made clear the exceptional circumstances under which they may do so, for example where a case can be made for unusual demographic and geographic factors**

We would have expected that constraints would be included here but the example given is where an authority's demographics or geographic factors indicate an alternative method could be used, rather than constraints such as Green Belt, flooding and others that affect many areas more broadly

- **No mention of change to standard methodology for calculating housing need**

We awaited the consultation for further clarity on this

# NPPF consultation

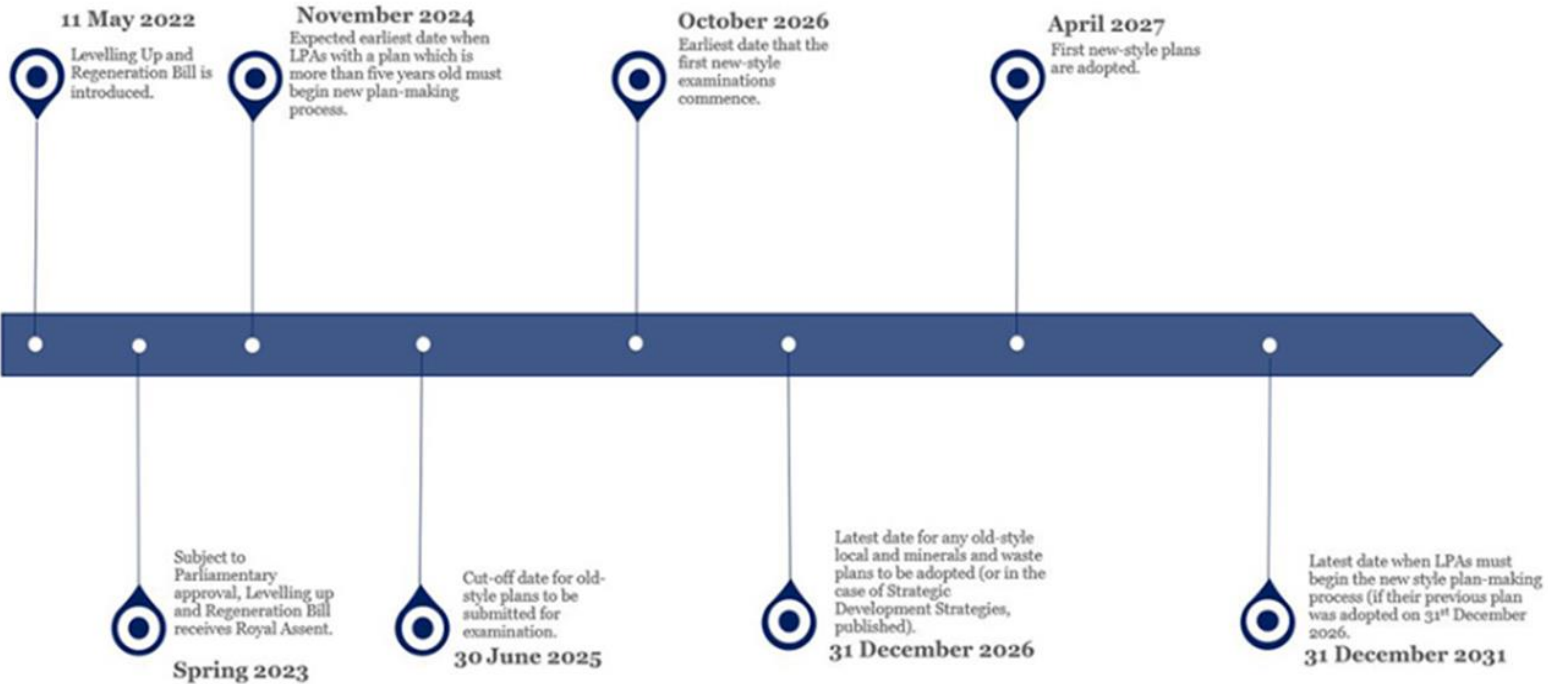
Published 23rd December 2022

## Proposed changes to the NPPF – consultation.

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# NPPF consultation



Department for Levelling Up, Housing and Communities



# NPPF consultation

“The RTPI’s priority throughout the process of planning reform has been to add greater weight to the allocation of land in local plans when decisions are taken. We have also consistently argued that national policy should do more to provide sufficient housing supply. We have argued that supporting high quality brownfield and greenfield development would enable our planning system to deliver the growth communities expect from levelling up more robustly and effectively.”

Royal Town Planning Institute



# NPPF consultation

**What does the consultation set out and how does this align with Michael Gove's letter?**

**There are no current proposals to amend the standard method**

The consultation document states:

It remains important that we have a clear starting point for the plan-making process and we are not proposing any changes to the standard method formula itself through this consultation. However, we will review the implications on the standard method of new household projections data based on the 2021 Census, which is due to be published in 2024.

Essentially, the Government has deferred dealing with this thorny subject by waiting for the Census data as justification for it being amended. In reality, this is kicking the can down the road and potentially for a new national government to deal with.

**Whatever happens with the revised NPPF consultation, our housing need figure remains unchanged.**



# NPPF consultation

## Introduction

### Current NPPF:

1. The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced.

### Proposed revision:

1. The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans can provide for sufficient housing and other development in a sustainable manner can be produced. Preparing and maintaining up-to-date plans should be seen as a priority in meeting this objective.

This is the opening paragraph to the NPPF. From Michael Gove's letter, we were expecting greater emphasis on not needing to meet housing need in full but this has been diluted in the revised version. Added emphasis on having an up-to-date Local Plan adopted and maintained.

# NPPF consultation

## Presumption in favour of sustainable development

### Proposed revision:

11 b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; such adverse impacts may include situations where meeting need in full would mean building at densities significantly out of character with the existing area; or
- iii. there is clear evidence of past over-delivery, in terms of the number of homes permitted compared to the housing requirement in the existing plan,; in which case this over-delivery may be deducted from the provision required in the new plan.

The revision adds the example of when meeting need would result in adverse impacts but does not refer to constraints such as Green Belt and instead uses the example of when meeting need in full would result in development 'significantly out of character with the area'. Still refers to unmet need from neighbours (but dropped from Para. 35 on soundness). The newly added (iii) does not apply to Spelthorne as we are not over-delivering.

# NPPF consultation

## Plan-making

### Current NPPF

15. The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

### Proposed revision:

15. The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

Despite Michael Gove's letter, meeting housing need is given further emphasis, not less, in the proposed revised NPPF



# NPPF consultation

## Tests of soundness

### Current NPPF

35. Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

# NPPF consultation

## Proposed revision

35. Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

- a) Positively prepared – providing a strategy which, ~~as a minimum,~~ seeks to meet the area's objectively assessed needs so far as possible, taking into account the policies in this Framework; ~~and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;~~
- ~~b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;~~
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

This appears to dilute the need to meet housing need in full by removing 'as a minimum' and substituting this with 'so far as possible'. This still represents a high test for local authorities. Reference to accommodating unmet need from neighbours has been dropped. Need for plans to be justified proposed for removal. What does this mean for evidence?

# NPPF consultation

## Housing Need

### Proposed revision

60. To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet as much housing need as possible with an appropriate mix of housing types to meet the needs of communities.

63. Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing; families with children; older people including for retirement housing, housing-with-care and care homes; students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes).

Updates confirm the needs to provide an appropriate mix of homes to meet needs. It also reiterates that as much need as possible should be met.

Reference to older people housing needs widened. Our housing need evidence (Strategic Housing Market Assessment) already considers different types of older people accommodation need.

# NPPF consultation

## Housing Supply and Delivery

### Proposed revision

~~75. where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:~~

- ~~a) 5% to ensure choice and competition in the market for land; or~~
- ~~b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or~~
- ~~c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply~~

The removal of a buffer on the five-year housing land supply means that it will be easier to demonstrate a 5YHLS and less 'speculative'. Any LPAs which have been subject to an advanced Regulation 18 or 19 consultation for plan making (i.e., have a proposals map and make allocations) will only need to demonstrate four years of housing supply for a period of up to two years.

Footnote 49 [Housing Delivery Test] The presumption is, however, not to be applied if permissions have been granted for homes in excess of 115% of the authority's housing requirement over the applicable Housing Delivery Test monitoring period.

Removal of the Presumption and 20% buffer if sufficient permissions are granted – this reduces the responsibility on the local planning authority and recognises external factors such as developers not implementing permissions.

# NPPF consultation

## Delivering a sufficient supply of homes

### Current NPPF

60. To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

61. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

# NPPF consultation

## Delivering a sufficient supply of homes

### Proposed revision

60. To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet as much housing need as possible with an appropriate mix of housing types to meet the needs of communities.

61. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area (see paragraph 67 below). There may be —unless exceptional circumstances relating to the particular characteristics of an authority which justify an alternative approach to assessing housing need; in which case the alternative used—which should also reflect current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

# NPPF consultation

## Delivering a sufficient supply of homes

This clarifies that the standard method figure is a starting point, which has not changed. It also reiterates there is the opportunity to consider an alternative methodology, although this too was always the case. It refers to 'characteristics' rather than constraints and this takes us back to Para. 11 covered earlier, where character is used as an example.

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# NPPF consultation

- New sentence added to Para. 140 (now 142):

Green Belt boundaries are not required to be reviewed and altered if this would be the only means of meeting the objectively assessed need for housing over the plan period.

**This has not changed** and it has always been the case that it is for individual authorities to decide if they have Exceptional Circumstances to amend Green Belt boundaries to meet housing need. Much has depended previously on whether inspectors consider enough has been done to meet need in full, resulting in many Local Plans failing under the standard method, albeit using the Duty to Cooperate as the reason for failure. We don't yet know how inspectors will take account of the proposed revised NPPF and whether the bar has been truly lowered.

**It doesn't mean that all other means of meeting objectively assessed housing need should not be exhausted, which seems to skew in favour of maximising homes on Brownfield sites – potentially risking the zoning approach.**



# NPPF consultation

## Other changes affecting our Local Plan

- No change to section on 'Making effective use of land' (Section 11), other than the support for Mansard-style roof extensions, or 'Achieving appropriate densities', other than to include reference to 'beautiful' places. This is where our approach to Brownfield development will be scrutinised, such as Staines and the zoning proposals.
- Section 12 now amended to 'Achieving well-designed and beautiful places'. New reference to preparing and using local design codes, which we would begin following adoption of the Local Plan.
- Section 14 - Meeting the challenge of climate change, flooding and coastal change. New para has been added:

161. To support energy efficiency improvements, significant weight should be given to the need to support energy efficiency improvements through the adaptation of existing buildings, **particularly large non-domestic buildings**, to improve their energy performance (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights). Proposals affecting conservation areas and listed buildings should also take into account the policies set out in chapter 16 of this Framework.

# NPPF consultation

## Annex 1 – Transition arrangements

- The Para. 35 provisions on soundness don't apply to Spelthorne as they only apply to plans that have not yet reached Regulation 19. For us and authorities at this stage (post-Reg 19), the existing NPPF applies.
- As the current NPPF requires us to meet our need 'as a minimum' rather than this being dropped in favour of 'as far as possible' in the revised version, this would suggest that an authority at our stage would need to withdraw the Local Plan from examination and undergo a further Regulation 19 consultation before the revised provisions would apply.
- This is why the transition arrangements will last two years as it is likely to take that long to review and revise the Local Plan in light of the amended policies then carry out a further Regulation 19 consultation before resubmitting.

# Where does this leave our Local Plan?

- Officers have analysed the proposed changes and it remains a 'sound' strategy
- None of the changes require us to amend our strategy or our policies
- Most of the revisions are not actually 'changes' but add further clarification to existing policy provisions
- Without a change to the standard method, our Plan should still aim to meet our development need, which includes the existing housing figure
- The Examination can proceed under the existing timetable and with no requirement to withdraw and reconsider

**It is entirely our choice whether we wish to pause and review, taking account of what we have achieved so far, the implications of continuing without an up-to-date Local Plan and what is in the best interests of our residents**

# What are the options?

1. **Continue with the Local Plan as submitted for examination, with adoption (together with Staines Development Framework) in Autumn this year**
2. **Withdraw the Local Plan, review whether we should consider a strategy that does not meet our housing need in full, update evidence base, carry out further public consultation (Regulation 19 as a minimum but potentially another Regulation 18 consultation followed by a Regulation 19 consultation) and resubmit the Local Plan for examination in 2024-26**

# Option 1

## If we continue as submitted...

- The Plan as submitted meets our development need in full, against the standard method figure we are still required to use. We remain confident it will be found sound and can be adopted later this year
- Having an up-to-date Local Plan places us in a protective ‘bubble’ for five years, during which we are expecting further significant changes to the planning system and these may not be in our favour, particularly if there is a change in national government. Government says the implications of the latest Census data on the standard method will be reviewed in 2024, the same year as the latest date for the next general election. Due to the work required under Option 2, it is most likely we won’t be resubmitting the Local Plan until after the general election.
- An adopted Local Plan with a 5-year land supply will allow us to defend against speculative development...
  - on Green Belt sites we want to see protected
  - on urban sites of excessive density and/or height, where they may otherwise be treated more favourably without a 5-year housing land supply (e.g. Inland Homes scheme in Staines, where the lack of a 5YHLS weighed in favour of allowing the appeal)

# Option 1

**We would benefit from the following this year if we continue as submitted, rather than needing to wait up to two years...**

- **Staines Development Framework can be adopted** – requires Local Plan to be adopted at the same time
- **Zoning in Staines can be implemented** – as above, as it relies on the Local Plan policy
- **Up-to-date policies on climate change**
- **Higher threshold for affordable housing, plus viability tested so more defensible** – 30% on brownfield sites and 50% on greenfield
- **Local Green Space designations and protections** – LGS can't replace the ineffective PUOS designation until the new Local Plan is adopted so sites will be less protected
- **Begin work on Design Codes** – 'beautiful' buildings, significant public engagement in the process
- **Robust defence against any Green Belt applications as we would have an up-to-date supply of homes** – have already received enquiries from developers, asking about the impact of changes on the LP timetable
- **Green and blue infrastructure initiatives and strategies**

# Option 2

## The implications of this approach...

- Potential to remove the Green Belt sites from the Local Plan – it appears from the proposed changes it will be easier in future to argue this point at Examination. It would still require identification of the harm and why the adverse impacts of meeting our housing need by amending Green Belt boundaries would ‘significantly and demonstrably’ outweigh the benefits (this ‘standard’ has not changed in the proposed revision). We also still need to meet our housing need ‘as far as possible’, which would remain a high bar. The cost of additional work to withdraw, review and resubmit the Plan would be considerable, running to over £100,000
- No change to brownfield allocations, or may result in requiring further intensification of brownfield sites especially in town centres – our housing need figure remains the same and there is no dilution of the national policy requirement to make effective use of brownfield sites. If anything, there is more focus on intensifying urban sites rather than Green Belt release. This could impact on how we set out our housing supply and whether the zoning proposals are likely to be found sound.

# Option 2

## The implications of this approach...

- Essentially, the Local Plan without amending Green Belt boundaries amounts to the 'status quo' as the brownfield sites can and will come forward for development, whether or not the new Local Plan is adopted – the zoning proposals in Staines are what we consider to be as far as we can go to limit development opportunities in a sustainable town centre. Other than zoning, there are no further policy limitations capable of being found sound that would prevent development coming forward at the heights and densities we have assumed in the SLAA in Staines and across the Borough
- **A Plan for Flats** – we already knew that a brownfield-only approach would deliver 98% of new homes as flats. This could even reach 100% if we have to further intensify brownfield sites as we are no longer meeting our need in full by releasing Green Belt sites. For example, on some sites we have assumed a small mix of houses and flats on existing industrial sites but these may need to be given over to fully flatted schemes to boost our supply. This affects our ability to deliver the mix of homes our communities need and becomes an argument over housing type versus housing numbers



# Option 2

## If we remove all the Green Belt sites, we lose:

- Most or all family houses with gardens
- A significant number of affordable homes
- Sixth form college in Sunbury
- Enhanced replacement community centre in Ashford – without being released from the Green Belt, only a modest increase in size would be allowed
- Sports and recreation improvements to Staines and Laleham Sports Club and Ashford Sports Club – we have been advised that for SALSC, this also may affect the future viability of the club
- Gypsy, traveller and travelling showpeople sites – no brownfield sites are available or viable so we would either need to argue we can't meet our need, which risks soundness, or still release these Green Belt sites (otherwise it is difficult to defend against unauthorised traveller sites)
- Defence against development on Green Belt sites using 'very special circumstances', whether originally proposed for allocation or not – York decision to allow 1000 homes on Green Belt allowed at appeal under VSC even after Michael Gove's letter was published, citing urgent housing need
- Protection for the two Stanwell Green Belt sites from being developed for employment purposes – these undeveloped sites will be more vulnerable to cargo use, which the community here opposes due to scale and HGVs

# What do our communities want?

**From the Regulation 19 consultation (percentages are approximate):**

- **6%** objected to any changes to Green Belt boundaries
- **6%** objected to the spatial strategy to meet housing need in full (this figure cannot be combined with the one above as some representees made both comments). These comments include those who considered Staines would bear the brunt of new development
- **4%**, mainly comprising developers, thought the Local Plan should aim to deliver **more** homes than the current strategy
- **10%** specifically supported the Local Plan for not including Kempton Park and/or the Running Horse sites for allocation
- **30%** supported the LGS proposed designations and/or wanted more sites designated

# What do the options look like?

Option 1 – Local Plan as submitted

Option 2 – Local Plan with all Green Belt sites removed

Development type	Number of units* Option 1	Option 2
<b>Homes overall</b>	<b>8,287</b>	<b>7,414</b>
Homes on brownfield sites	7,414	7,414
Homes on Green Belt sites	873	0
Flats	7,580 (91%)	7,274 (98%)
Family homes with gardens	707 (9%)	140 (2%)
Affordable housing	2,376	1,948
	1,948 (Urban) 428 (Green Belt)	
Gypsy and Traveller pitches	3	0
Travelling Showpeople plots	15	0

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# What do the options look like?

Option 1 – Local Plan as submitted

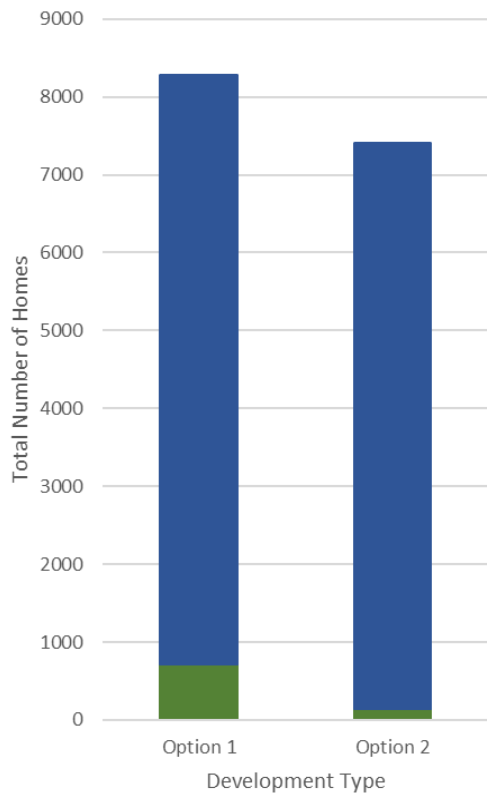
Option 2 – Local Plan with all Green Belt sites removed

Development type	Number of units* Option 1	Number of units* Option 2	Units lost in Option 2
<b>Homes overall</b>	<b>8,287</b>	<b>7,414</b>	<b>-873</b>
Homes on brownfield sites	7,414	7,414	No change
Homes on Green Belt sites	873	0	-873
Flats	7,580 (91%)	7,274 (98%)	-306
Family homes with gardens	707 (9%)	140 (2%)	-567
Affordable housing	2,376	1,948	-428
Market housing	5,911	5,466	-445
Gypsy and Traveller pitches	3	0	-3
Travelling Showpeople plots	15	0	-15

\*Not including implemented schemes or windfall allowance

# What do the options look like?

## Housing Mix

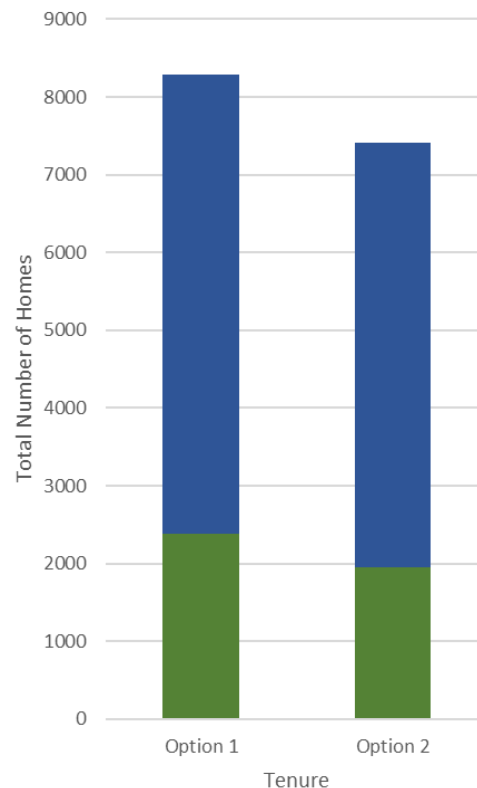


### Key - Development Type



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## Housing Tenure



### Key - Tenure



Development Type	Option 1	Option 2	Difference
Family Homes with Gardens	707	140	-567
Flats	7580	7274	-306

Development Tenure	Option 1	Option 2	Difference
Affordable Homes	2376	1948	-428
Market Value Homes	5911	5466	-445

# What do the options look like?

Removing the Green Belt sites results in a loss of **428** affordable homes over the Plan period



- It is one of the Council's agreed priorities (CARES) in the Corporate Plan to deliver housing which meets the needs of all sections of our communities, building new homes, helping people to stay in their existing accommodation and reducing homelessness
- This is not only a loss in quantum but also means that many of these affordable homes could have been delivered as family houses (appx 275 houses). The remaining AH units without the Green Belt release sites will almost entirely be delivered as flats
- The need for affordable housing is a growing problem and the Local Plan is a key tool in the strategy to increase the rate of delivery, which has been low on urban sites via registered providers
- The Green Belt sites for release will deliver at 50% as the viability is significantly greater on undeveloped land and many are allocated in the first 5 years of the Plan, which provides a much-needed boost to supply for those already on the housing register

# What do the options look like?



Removing the Green Belt sites results in a loss of **428** affordable homes over the Plan period

- As of 9 Jan 2023, we have **122** households in emergency/temporary accommodation
- As of 9 Jan 2023, we have **3,736** applicants on the housing register waiting and bidding for affordable homes.

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This has been increasing over the last few years:

Number of bedrooms required by household	Number of households 2019/20	Number of households 2020/21	Number of households 2021/22
1 bedroom (or Studio flat/bedsit)	870	1,261	1,580
2 bedrooms	832	1,030	1,165
3 bedrooms	326	437	525
4 or more bedrooms	70	95	108
<b>Grand Total</b>	<b>2,098</b>	<b>2,823</b>	<b>3,378</b>

# Conclusion and recommendation

- It is clear from the summary tables that the Green Belt sites do the ‘heavy lifting’ in terms of delivering affordable homes, family houses with gardens, an overall mix of housing types, gypsy and traveller sites and significant community benefits
- We have already reduced the number of release sites to result in just 0.7% loss of Green Belt but these result in substantial and tangible advantages over a Brownfield-only Plan
- There is no reason why we can’t proceed with our Plan as submitted and still be found ‘sound’. This also prevents significant additional costs being incurred
- Doing so gets the Plan and the SDF adopted this year and frees up resources for Strategic Planning officers and Members to then move onto other key projects around place-making, design codes, further transport work for Staines, and green and blue infrastructure
- We will benefit from significantly greater protection from speculative development and further national policy changes with an up-to-date Local Plan, especially in light of potential for a new national government



# Conclusion and recommendation

**The advice of officers is to continue  
with the Local Plan as submitted**

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Strategic Planning Team  
Spelthorne Borough Council  
January 2023



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