

Councillors' Feedback on Preferred Options Consultation Response Document

The Strategic Planning Team appreciate the time taken by Members to provide feedback on the Preferred Options Consultation Response Document. We have received two types of comments; those on the officer responses and also some on the content of the actual Local Plan itself. In order to publish the Response document as soon as possible, we need to consider the feedback we have received on officer comments.

We will hold on to comments made on the content of the actual Local Plan document and take this into account when we are making changes to the plan itself.

Feedback on the Response Document

| Page | Reference | Feedback | Action |
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| | Introduction | Introduction should reflect our appreciation to those residents who have actively sought to engage in the process | Added a para at 1.3 |
| | | Document needs to address the timelines for when we can expect documents such as the Infrastructure Delivery Plan. Needs more information about the process and next steps. | Inserted new text at para 1.4 |
| | Green Belt | | |
| 16 | 6.2 | "Special Circumstance' <i>can</i> be a reason to release Green Belt <i>Must</i> it be a reason? | Very special circumstances is the terminology for planning applications. The officer response is quoting the NPPF section on Plan making which refers to exceptional circumstances. |
| | Housing | | |
| 21 | 1.3 | 'High Bar' Would the exceptional amount of water in the Borough and thus the much lesser amount of Green Belt <i>land</i> achieve that High Bar on the grounds our land is much rarer and so more valuable? | Our assessment of the Green Belt shows whilst it is fragmented, there are some parcels which are not performing well against the five purposes of the GB, as set out in national policy. The Preferred Options Local Plan which was consulted on considered the release of 1.6% of the borough's GB would be lost and deliver our housing need. The LPTG will consider if they wish to take these sites or any other in the Green Belt forward. |

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| 21 | 1.6 | '2020 base line' (I thought we were locked to the 2014 baseline?) | <p>The "2014 figure" refers to the 2014 based ONS Household Growth Projects which the Government insists we use. This means that 2014 is the starting point.</p> <p>The projections are 2014-based and project forward 25 years from 2014 (base year) to 2039. We must use this table of data but refer to the year 2020 so that our figures are up to date.</p> |
| 22 | 2.3 | 'Area we need' Please let's not play the government line. When talking about our housing need it should always be expressed in terms of ' <i>...The government demands...</i> ' ' <i>...the government says we must build...</i> ' or whatever. But <u>never</u> in terms that it is our decision. | Paragraph amended to include " <u>The Government says...</u> " |
| 26 | 4.5 | Do people really understand that if we want to tackle the shortage of affordable housing then currently Green Belt is the best option? | The officer response explains this however we will reinforce this point if the Local Plan Task Group decide that GB is released for housing. |
| 26 | 5.1 | Suggest that wording needs to be stronger regarding being unable to meet neighbours' needs. | Paragraph amended to state: Spelthorne faces the challenge of meetings its own development needs within this environment <u>and does not have surplus land to unmet need of neighbouring authorities</u> but is... |
| Gypsies and travellers | | | |
| 28 | | Request for clarity over need figures | At the time we produced the Local Plan Preferred Options document we were working on the need identified in the Gypsy and Traveller Accommodation Assessment. Following the Inspector's visit we may be able to adjust these numbers but this will be a matter for |

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| | | | discussion with the Local Plan Task Group during the next stage of plan preparation |
| | Health | | |
| 35 | 1.1 | Infrastructure: How can we make this stick given that much of the infrastructure is supplied by 3rd parties. If they fail is this a show stopper? | Whilst the infrastructure is supplied by 3 rd parties in most circumstances, the LA acts as the coordinator. The IDP will identify deficiencies in provision and if an allocation were dependent on specific element of infrastructure provision, we would refuse a planning application on those grounds. |
| 36 | 2.2 | As Shepperton youth club has been identified for re-development, surely this is the logical site for extra health provision? | The IDP will consider this further. The land ownership is between Surrey CC and the GP. The IDP can work with both parties to identify suitable locations for infrastructure provision |
| | Biodiversity | | |
| 40 | 1.1 – 1.6 | Wildlife needs proper protection not this caveated interpretation which ends up with habitats destroyed. | Planning Officers are limited by the NPPF and other national guidance. Unless areas are designated for protection it is difficult to refuse a planning application on this basis. We strive to achieve wildlife protection and mitigation but we are limited by the protection of individual species and habitats. |
| | Leisure & Open Spaces | | |
| 45 | 1.1 - 1.8 | More protected Fields in Trust | The NPPF affords the ability to protect open spaces but Fields in Trust is outside the scope of the NPPF. Fields in Trust works in partnership with landowners including local authorities, voluntary organisations and private landowners to protect land through a Deed of Dedication – a binding legal commitment with the |

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| | | | landowner – which allows green spaces to be protected in perpetuity for current and future generations to enjoy. The spaces principal use should be outdoor sport, play or recreation and they must be accessible to the public. |
| | Water | | |
| 52 | 6.1 | I don't understand the claim that there is sufficient water supply. When touring QM reservoir informed that a few years ago the supply for London fell to within three days. So it's clear there is a big problem as the weather gets more erratic and hot and dry in the summer | The Spelthorne Water Cycle Study evidence document will confirm the water availability or shortage in the borough. This will be available on the website when published. |
| | Character of the area | | |
| 73 | 1.1 | Final submission Yes and Yes and YES Government should cut our house building targets because our current ones are so dodgy. | Comments noted. |
| | Flooding General | Do we know as yet what policy regime will be in force to monitor and enforce these policies? What happens if updated data re-classes an area from one flood zone level to another during the life of the plan? | Compliance will take place via the usual enforcement channels. Flood information is regularly updated by the Environment Agency. Planning Officers use the most up-to-date information available when taking decisions. The flood maps are held online to ensure they are updated regularly. Site allocations will still require a planning application, which will be assessed in light of any flood risk that exists at the time of determination. |
| | Highways General | Surrey claim the new build proposals will not have a 'severe' impact on Spelthorne. What is the definition of severe? | National policy does not provide a definition of 'severe'. The severity test is however limited to impacts on the road network. It will be for authorities and inspectors to decide what constitutes |

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| | | | an unacceptable or severe impact. Surrey CC are the responsible highway authority and have specialist transport planners who advise boroughs on such matters. |
| | Policies that will be implemented as part of planning applications | Obviously these are all potentially 'in the air' at the moment | Comment noted. |
| | Settlements | | |
| P93 onwards | General | It needs to state that the Working Group is actively re-examining site allocations made in the initial Local Plan with intended changes | This text has been added to para 1.4 |
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Additional comments on Draft Local Plan document that will be considered by officers and taken forward by the Task Group as we progress the Local Plan

- Feedback on sites they would like removed.
- Feedback on sites they would like added.
- Feedback on sites where different use is proposed.
- Confirm that brownfield land has been prioritised.
- Plan needs to take advantage of every opportunity to reuse and upgrade the existing urban areas. Town centre capacity and density. Retail/commercial to residential conversion.
- Town centre developments need to provide adequate multi-storey car parking.
- Update on negotiations with the Government over housing targets.
- The infrastructure needed to support all these developments.
- Urban design
- Preserve the character of the different areas of the borough.
- SUDS - impervious surfacing around buildings should be forbidden and enforced.
- Cross local planning authority cooperation and a consistent approach to the River Thames Scheme is vital.
- Proposal that further consultation is held with residents to explain and discuss policy developments such as mini-seminars and roundtable discussions that reflect on some of the points in the various policy areas. Those that have engaged with the policies of the Local Plan deserve to know that we as Councillors have fully considered the impact of policies which will determine future development in the Borough.

Wider planning issues raised that are outside the scope of the Local Plan

- TPO rules need strengthening including automatic transfer to the replacement tree.

- Listed buildings nationally not properly protected. Laws should be that owners of a listed building must keep it in good condition and not let it go to rack and ruin so then the only solution is to pull it down.
- Empty homes
- Cycle lanes - these are inconsistent and in some cases dangerous as the lane disappears where a road gets narrower. Provision of proper areas for cycling would be much better than spending money on ineffective paint.
- Electric Vehicles deal support air quality.