

Environment & Sustainability Committee



8 November 2022

Title	Staines Development Framework
Purpose of the report	To make a decision
Report Author	Ann Biggs, Strategic Planning Manager
Ward(s) Affected	All Wards
Exempt	No
Exemption Reason	N/A
Corporate Priority	Community Environment Service delivery
Recommendations	Committee is asked to: Agree the final version of the Staines Development Framework Supplementary Planning Document (SDF)
Reason for Recommendation	Following the final stage of public consultation on the SDF, the document has been updated to take account of feedback received. These changes are recommended by the Staines Development Task Group to the Committee in order to agree the final version for submission alongside the Local Plan to the Planning Inspectorate.

1. Summary of the report

- 1.1 This report seeks agreement to the final version of the Staines Development Framework Supplementary Planning Document, setting out what changes have been made following the last public consultation and the comments from the Staines Development Task Group in recommending the document to the Committee. It also sets out the next steps in the process to adoption.

2. Key issues

- 2.1 Production of the Staines Development Framework (SDF) has been ongoing since the consultants, David Lock Associates, were appointed in May 2020. The SDF is intended to provide supplementary guidance on the future of Staines town centre to support the overarching policy provisions within the

new Local Plan. A Staines Development Task Group, comprising all Members from the Staines wards, has been steering this work.

- 2.2 After engaging with key stakeholders during the initial stages of preparation to inform an Analysis and Review Paper, the first public consultation was held on Objectives and Options from 18 May to 29 June 2021. The feedback from this consultation was then used to produce a draft SDF and a further consultation was held from 15 June to 5 September 2022.
- 2.3 A series of consultation events were held throughout the summer, including multiple days manning a stall in Staines High Street, a stall at Staines-upon-Thames Day and a two-day drop in event on Friday 1 and Saturday 2 July at the Elmsleigh Centre with officers and the consultants from DLA. These sessions allowed for members of the public to see the draft Framework, ask questions and be informed on how to respond to the consultation. Verbal comments could not be recorded as they are required to be in written form. There was also extensive communication to residents to inform them of the consultation and the events, including via social media, The Bulletin magazine and a leaflet sent to every household in the Borough. The public were able to respond by either accessing the Framework online and making comments against the document itself or completing a short questionnaire based around the six Big Ideas, although this included a free text box for other comments. A paper copy of the questionnaire was available at the Elmsleigh events to fill in on the day or return via a supplied envelope at a later date. Written submissions in any format were also accepted by email or post.
- 2.4 The following is a summary of the number of responses and the type of respondent:

Type of respondent	Number of respondents
Resident (of Spelthorne or outside the borough)	33
Organisations	8
Agents acting for developers/interested parties	3
Residents' associations	2
Councillors	1
Total	47

- 2.5 Many of the issues raised during this final stage of consultation related to the new Local Plan overarching strategy on housing supply and delivery affecting Staines upon Thames, the heights and densities of sites proposed for allocation in the town and the principle of 'zoning' within the Staines policy in the Local Plan. As such, they have been attributed to the Regulation 19 consultation for consideration at examination once the Local Plan has been submitted. There is ample opportunity of those who made representations as part of the Regulation 19 consultation on the Local Plan to appear (should they so wish) to make their views known directly to the Planning Inspector at the Examination.
- 2.6 A full Consultation Response Document will be produced but officers are prioritising the submission of the Local Plan so this will be to follow. All the

representations will also be made publicly available via the online consultation portal. Below is the analysis of the comments made and the suggested changes put to the task group:

The consultation feedback has been reviewed by officers and the consultants from DLA. The issues raised are identified below, against each 'Big Idea' from the Framework plus additional comments, together with recommended changes proposed in order to finalise the document.

Big Idea 1 – Connecting to the Rivers

Response Themes/Comments:

- Overall support for this theme
- How will rewilding be implemented and space for nature provided?
- Need to reference more links to wider green infrastructure & blue infrastructure, and biodiversity opportunity/habitat restoration and Biodiversity Opportunity Areas (BOA)
- Views to the river important
- Support from EA regarding potential for a river restoration project on the River Colne.

Recommended Responses:

1. Include case study reference to River Quaggy restoration in Lewisham (p100)
2. Include reference to potential integration with Colne Valley Regional Park (p80, p83)
3. The River Thames forms part of the two Biodiversity Opportunity Areas in Spelthorne (TV03 and TV04). The River Thames is also a Site of Nature Conservation Interest (SNCI). Make reference on p80.
4. Reference to preserving views of river where possible within Development Sites
5. Include reference to future feasibility studies in consultation with stakeholders, and any river restoration project on the River Colne should be developed in consultation with the Environment Agency. (p141)

Big Idea 2 – Development that Respects Character

Response Themes/Comments:

- Support for zoning, but heights considered too tall in many responses
- Strong concern about level of protection afforded including role of exceptions part of policy
- Landowners would prefer 'indicative' zoning/density plan
- Need to protect nature in riverside protection zone and along riverbank
- What is the definition of 'refined/changed character' in SP1?

Recommended Responses:

6. Define the 'refined character of Staines-upon-Thames' – Big Ideas section
7. Include ST4/004 – 96-104 Church Street as development site on sites map (Figure 15) with flexibility of use. Clarify with Local Plan allocations. Update Figure 16 to note townscape quality of frontage building
8. Clarify that a detailed design process required for key sites - include note on good design process and expectations in line with National Design Guide and National Model Design Code at start of Chapter 6
9. Update all maps and zoning plan to include new Conservation Area, and all LP allocations within the boundary (if missing)

10. More detail on methodology for how we got to density and height zones – annotated diagram or appendix to reflect thinking set out in SDG meetings

Big Idea 3 – Healthy Streets for People

Response Themes/Comments:

- High levels of support
- Some concern about displacement of traffic and whether proposals are practical
- National Highways concerns about traffic displacement to strategic network
- Some specific G&B Infrastructure recommendations within streets
- Include more reference to nature-based solutions and greening the public realm
- Should car parking in new developments be reduced/discouraged explicitly – Local Plan issue?
- Station Path – improve delineation of shared path
- Accessible and inclusive design not made clearer
- Appropriateness of re-providing car parking given climate change agenda, but also concern about growth requiring more parking

Recommended Responses:

11. Note more clearly that further studies needed on transport interventions, especially the need to try and divert and discourage through traffic (p78, p87)
12. Make clear the logic and reasoning behind keeping public parking provision at similar level, make more explicit (p77)
13. Update street diagram to match consultation coloured diagram (p89)
14. Green and Blue Public Realm specifics (p82):
 - a. Recommendation for the provision of underground cellular systems for all new tree planting within hard surfaced environments,
 - b. Careful consideration should be given to species choices for new tree planting within the public realm.
 - c. Recommendation to consider scope for hedge planting (evergreen and/or semi-evergreen species) as soft screen between vehicular and pedestrian / cycle routes (p88)
15. Include Surrey Wildlife Trust recommendations on places where nature can be incorporated into streets (p90, p50, p70)
16. Recommend clearer delineation of cycle facilities (e.g. pink paint/tarmac) (p90)
17. Clearer interventions and requirements for accessible and inclusive street design (p88)
18. pp5.100 – should be Gresham Road, not Laleham Road

Big Idea 4 – New Open Spaces

Response Themes/Comments:

- High levels of support
- Maintenance and stewardship of spaces important
- Importance of greening of spaces and inclusion of green infrastructure, nature, habitats
- Include more space for children to play
- Importance of activation
- Include physical activity

Recommended Responses:

19. Make reference to activation, programming, maintenance & stewardship (p96)
20. Greening the new open spaces principles (p94)
21. Identify opportunities for play areas (p96)

22. Identify principles of making spaces more active (p96)
Big Idea 5 – Redevelopment of the Elmsleigh & Tothill Area
<p>Response Themes/Comments:</p> <ul style="list-style-type: none"> • Support for link to river • Concern about losing Riverside Gardens Car Park • Strong concern about heights and scale • Need more opportunities for retention of existing buildings • Bus station – be more specific about quality improvements (real time information/RTI, toilets, bike hub, shelter etc) • Bus station – TfL support for single facility with toilets for driver use and efficient, simple provision
<p>Recommended Responses:</p> <p>23. Make phasing and building retention options clearer with reference to embodied carbon and retrofit options (p135)</p> <p>24. Clarity on bus station improvements needed (real time information/RTI, toilets, bike hub, shelter etc) (p76)</p> <p>25. Comment on TfL preferred option for bus station and facilities (p76)</p>
Big Idea 6 – Design for Urban Living
<p>Response Themes/Comments:</p> <ul style="list-style-type: none"> • Need to include more nature in new developments • Need to reference space for children to play • Strong concern about high rise development in the town centre • National Design Guide recommendations for Staines
<p>Recommended Responses:</p> <p>26. Include up front section on how to apply National Design Guide themes to Staines (p106)</p> <p>27. Suggest designs should also demonstrate opportunities for people to interact with nature, whether this be by providing onsite access to nature through planting proposals (principle 8, p121) and providing areas to relax within these areas, or providing pedestrian access larger open spaces (principle 1, p114)</p> <p>28. Principle 8 include ensuring play space within developments (p121)</p>
Overall Comments & General Notes
<p>Response Themes/Comments:</p> <ul style="list-style-type: none"> • Quite a lot of overall support for underlying aims and ambition • Strong concern about potential heights and scale of new development • Strong concern about overloading of infrastructure through development and growth • Strong concern about housing numbers and amount accommodated within Staines • Concern that opportunities to tackle climate emergency not sufficiently addressed • Need to include more on health and wellbeing
<p>Recommended Responses:</p> <p>29. Existing buildings – reuse and greening needs to be made more prominent (p116)</p> <p>30. Paragraph/mention of improvements to environmental health & air quality (p50)</p>

2.7 At Appendix A is the annotated version of the Framework to reflect the recommended changes, to show how and where they have been incorporated (the yellow 'chat' icon) and cross reference to the response numbers and page numbering in the table above. Appendix B is the 'clean' version without the annotations.

2.8 Members of the task group were provided with the schedule of proposed changes and annotated SDF a week ahead of their meeting on 3 October 2022, to which the Local Plan Task Group members were also invited. DLA gave a detailed and comprehensive presentation on the consultation feedback and the suggested changes one by one. There was the opportunity for Members after each 'Big Idea' to make comments and discuss the proposed updates to the document. Only those amendments arising from the representations could be considered rather than additional matters as the draft had been agreed by the Council on 19 May 2022. The following are the key points covered at the task group meeting:

- Further work needed on transport proposals to progress towards delivery with Surrey County Council. The SDF lays the groundwork but this would be a separate exercise and would need agreement from Environment & Sustainability Committee to the scope and specification
- The SDF has to hang off the new Local Plan and can't be adopted beforehand as there are no hooks in the existing Core Strategy policies to do so (which has been the consistent advice to members). The overarching policy is SP1 in the new Local Plan (the 'parent'), and the SDF provides the detail (the 'child').
- Discussion over the amended zoning plan to reflect the new Conservation Area boundary and explanation provided to show which buildings are now included, such as the former Debenhams site
- Proposals affecting the bus station to incorporate the comments from Transport for London and ensure the needs of the disabled are met. Reference is made in the document but ultimately it is for the landowner (Spelthorne) to work with TfL and Surrey County Council to ensure any re-provided facility suits their requirements
- The need to accommodate additional electric vehicles in the town over the Framework period if parking becomes more limited to encourage people onto sustainable modes. This was noted but the document reflects wider policy around cycling, walking and public transport, which will be considered through the Local Plan examination
- Concern that (as originally drafted) the feedback document did not sufficiently address the strength of feeling in the representations from those objecting to high rise development in Staines. It was pointed out that these concerns related to housing supply, density and distribution as part of the Local Plan so these comments will be considered at examination and have been added to the feedback to that consultation. The SDF provides design guidance for taller buildings and the detail and map to support the zoning policy. The term 'strong concern' was added to the schedule of representations that Members were provided with, and which is replicated above. It was also noted that conversely there were comments objecting to limiting heights and densities of

development in Staines. All the representations will be set out in more detail in the Consultation Response Document

- That Members' agreement to the final version of the SDF related only to that document, and not the wider Local Plan and strategy affecting Staines

- 2.9 Following this review and discussion, Members were then asked if they agree to recommend the changes and resulting final version of the SDF to this Committee and all were in agreement, with no additional amendments proposed.
- 2.10 The next steps if the Committee agree the recommendation are that the final version of the SDF will be published and submitted with the Local Plan by the end of November 2022. The SDF will then be a core document for the examination and whilst it would not be examined in its own right it is inevitable that discussion will take place at the hearing sessions over its purpose and content, including how it supports the Local Plan policies and the overall strategy. The examination hearings are likely to take place in March/April 2023 and we can expect the inspector's report in the summer. On the presumption that the Local Plan is found sound, it will come back to the Council together with the SDF for adoption around September 2023. It should be noted that this timetable becomes uncertain after submission as it is entirely dependant on the Planning Inspectorate and the appointed inspector, for example the number of hearing sessions required and over what period, but this is our best estimate based on other examinations.
- 2.11 Finally, officers wish to place on record their gratitude to the consultants from David Lock Associates, who have produced an excellent standard of work and have engaged with officers and members of the task group in such a professional and collaborative way, especially when there have been challenging issues under discussion.

3. Options analysis and proposal

- 3.1 The Committee is asked to agree the final version of the Staines Development Framework, which will then be proposed for adoption together with the Local Plan once it has been examined and we receive the inspector's report. The task group has reviewed the representations and agreed the changes in order to recommend the SDF be approved. In not agreeing the final version, this would set back the submission date for the Local Plan as the two are intrinsically linked by the Staines upon Thames policy that includes the zoning proposals that the SDF provides the detail for, plus other references to the SDF throughout the Plan. The SDF is an important tool for determining planning applications that alongside the zoning proposals also includes useful guidance on design, climate change mitigation, specific proposals for key sites in the town, opportunities for enhanced open space, promoting biodiversity and improvements to cycling and walking infrastructure as alternatives to car use. Delays to finalising the SDF would mean these benefits cannot be sought for a longer period, with planning applications for developments in Staines Upon Thames continuing to be assessed against existing out of date policies in the Core Strategy 2009 and national policy that does not contain this level of detail bespoke to the town.

4. Financial implications

- 4.1 None arising directly from this decision. It should be noted that further delays to the Local Plan process would incur additional expenditure. Advice from the Department of Levelling Up, Housing and Communities is that such a delay could be as long as two years if the Local Plan does not progress to examination and the strategy is revisited again. Costs would be several hundred thousand pounds to produce new and updated evidence, together with officer time and further consultation events.

5. Risk considerations

- 5.1 The main risk would be to not agree the final version of the SDF and therefore delay the submission of the Local Plan. There are various risks arising from such a delay, including the difficulty in defending planning appeals without an up to date plan and a five-year housing land supply. The Council has already seen the impact of this with the scheme at the Telephone Exchange and Old Masonic Hall in Staines, where the chronic under delivery of homes against our objectively assessed housing need was given significant weight in the decision to allow the appeal. Across the wider borough, the risks are to the most important Green Belt sites not proposed for release but where developers are keen to progress their schemes. As explained above, the risks also include significant financial outlay if progress is halted or the strategy revisited.

6. Procurement considerations

- 6.1 None.

7. Legal considerations

- 7.1 Officers from the Legal department have provided support and advice throughout the preparation of the Local Plan and SDF, plus external counsel advice has been provided.

8. Other considerations

- 8.1 None.

9. Equality and Diversity

- 9.1 The Local Plan, which the SDF will supplement, is supported by an Equalities Impact Assessment.

10. Sustainability/Climate Change Implications

- 10.1 Measures to mitigate climate change and improve sustainability are integral to the SDF to form guidance for developing schemes and in the proposals, particularly referenced in the Healthy Streets for People section (Big Idea 3).

11. Timetable for implementation

- 11.1 See 2.10 above.

12. Contact

- 12.1 Ann Biggs, Strategic Planning Manager, a.biggs@spelthorne.gov.uk

Background papers: There are none.

Appendices:

Appendix A – Staines Development Framework – amendments annotated
Appendix B – Staines Development Framework – Final Version