

## Local Plan Priorities Survey Results

### **Background**

Following the pause of the Local Plan, which was agreed at Full Council, a Motion was brought forward to engage with Resident Associations in the Borough to determine residents' priorities for the future of the Borough. The survey was open from Friday 14 July until Sunday 30 July. Answers could be submitted via an online survey or as a paper questionnaire. They were asked to choose 5 priorities and rank them from a selection provided but were also able to add their own priorities. Two opportunities to include additional comments were available.

### **Priorities:**

- Designing places and spaces (e.g. heights of buildings)
- Affordable housing
- Environmental protection
- Flood risk
- Green and blue infrastructure
- Heathrow Airport
- Heritage and conservation
- Homes for all
- Infrastructure and delivery
- Leisure, culture, open spaces
- Meeting employment need
- Protecting Colne Valley Park
- Protecting Green Belt
- Responding to the climate emergency
- Retail and local shopping needs
- Sustainable transport
- The River Thames and its tributaries

A total of 45 surveys were issued, and we received 20 completed questionnaires (44% return rate)

**The responses represent:**

Keep Kempton Green

Lower River Ash Residents Association

Riverway (Laleham) Management Ltd

Laleham Residents Associations

Shepperton Residents' Association

Wraysbury Gardens Courtyard Residents' Association

Stanwell Moor Residents Association

Lower Sunbury Residents Association (LOSRA)

Littleton Common Residents Association

Staines Village Residents & Traders Association

Richmond Road Residents Association.

Staines Town Society

Station Approach Residents Association

Talking Tree CIC

Spelthorne Residents Association and Spelthorne Green Belt Campaign. JOINT  
SUBMISSION

Manor and Priory Residents Association

Charlton Village Residents Association

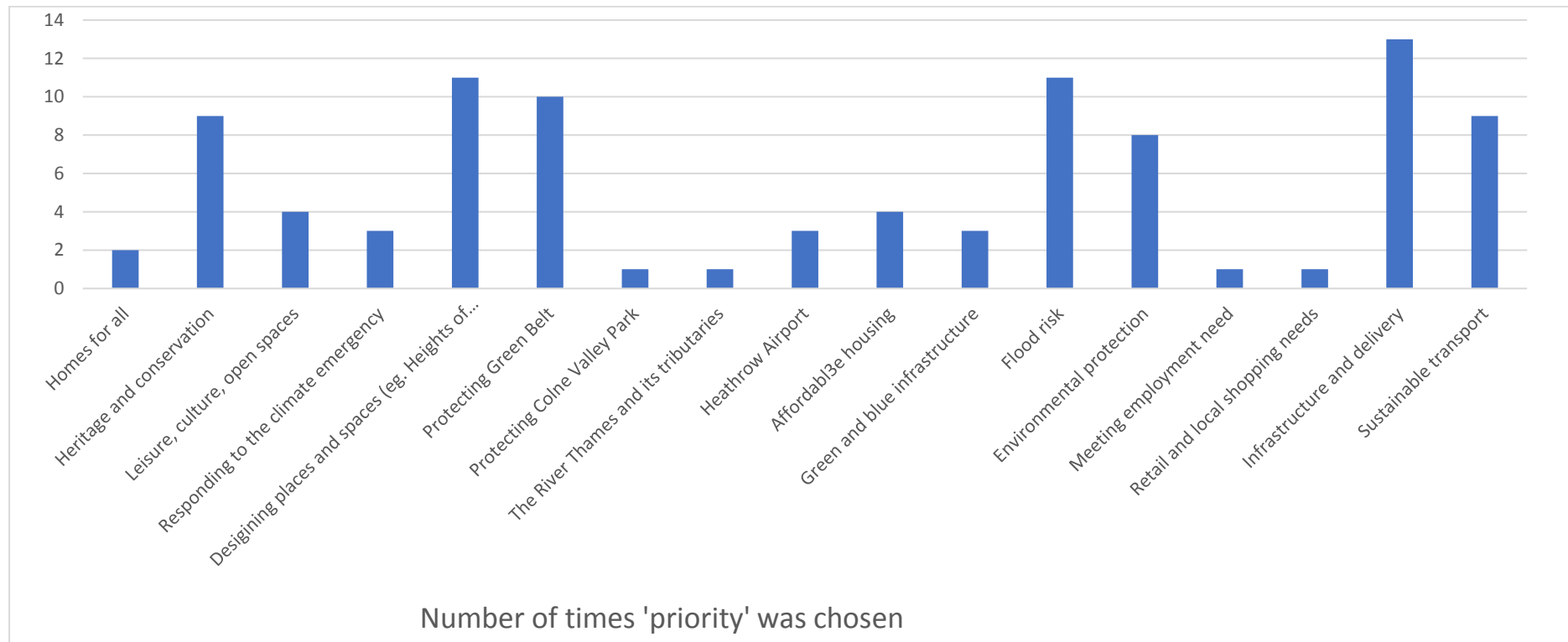
Penton Hook Association

Thames Edge Management Ltd.

## Results

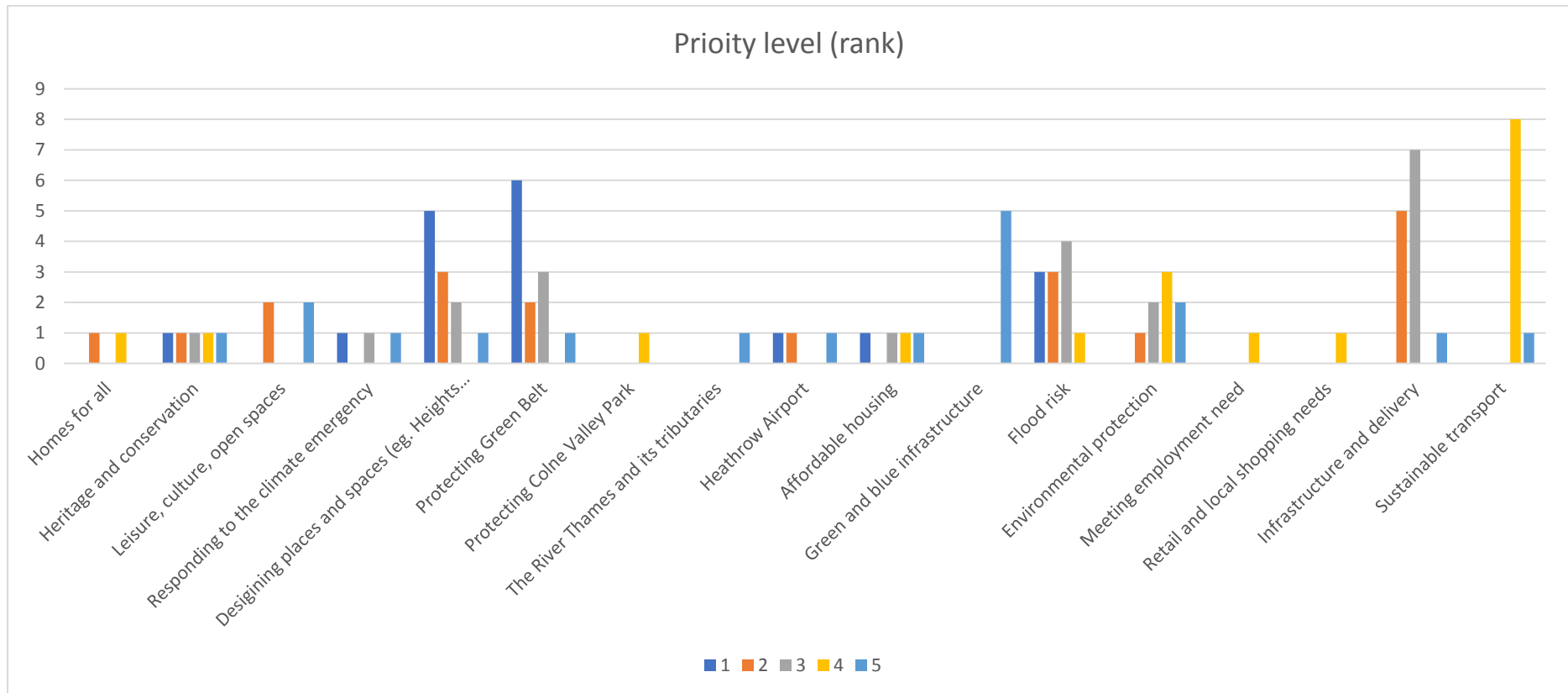
These were the priorities chosen across the 20 RAs that have responded, listed from highest to lowest. This graph reflects how many times each priority was chosen.

- The priority chosen 13 times is Infrastructure delivery
- The priority chosen 11 times, is shared between Designing Places and Managing Flood Risk
- The priority chosen 10 times is Protecting Greenbelt



The graph below reflects how the priorities were ranked from 1 - 5 (1 being the highest)

- The priority that was ranked as number 1 the most was Protecting Greenbelt, followed by Designing Places
- The priority that was ranked as number 2 the most was Infrastructure and delivery, followed by Designing Places/ Flood Risk
- The priority that was ranked as number 3 the most was Infrastructure and delivery, followed by Flood Risk



## Free comment section results

The overriding themes in the free comment boxes are listed below in order:

- **pause of the Local Plan**
- **the impact on Staines-upon-Thames and included heights of development**
- **Green Belt protection**

The full comments are detailed in the below table:

Question:5. Do the options listed above include your priorities? (maximum 1000 characters)   Comment	Question:6. Do you have any additional comments you would like to make? (maximum 3000 characters)
<p>Our most immediate concern is the “pause” to the progress of our Local Plan through the Examination in Public. Every day we do not have progress towards a valid and adopted Local Plan leaves Green Belt, brownfield and other sites at risk of predatory development. Even sites which are allocated for development are at risk of the Borough losing control of the design aspects of any development.</p> <p>It is totally meaningless to talk about protecting Green Belt or minimising building heights unless you have a Local Plan. No-one likes the present draft Local Plan, but the alternatives are far worse.</p>	<p>Ditto the above in Part 5.</p>
<p>Traffic issues have long been the main concern of Laleham residents. The increasing volume of traffic and the size of HGVs going through Laleham continue to be a blight and this has been exacerbated by the expansion of Shepperton Studios. When complete it will have parking for some 3000</p>	<p>Whilst most people would like no development in Spelthorne the reality is there is a national housing shortage and net immigration of 600,000 last year. Where are these people supposed to live? Spelthorne is not a special case. It is delusional to think that Spelthorne’s housing target will be reduced. The LRA find the action of the councillors by pausing the plan to be</p>

cars in addition to HGVs bringing heavy equipment to and from the site. Ideally a bypass around the centre of Laleham would provide the solution.

Road closures and road works throughout the area as a result of the studios expansion, Esso pipeline and gravel works have led to unacceptable delays and diversions. Whilst knowing this is primarily a Surrey matter Spelthorne seems to have been powerless to mitigate these uncoordinated works and mitigate the impact on residents.

irresponsible and uneducated and is a total waste of time and funds. We are unimpressed as they have no clue as to what it takes to put something like this together and the role it plays within the development of a local area.

Pausing the local plan is likely to have an irreversible adverse effect on development in Spelthorne. The pausing of the local plan was said to enable new councilors to have training in relation to the plan. It was then almost immediately cancelled before subsequently being reinstated under pressure from various quarters. It was further proposed that a 'so-called' independent expert would be called in to review the plan. Do the Councilors have no faith in their officers who have spent some five years drawing up a detailed and widely considered plan? The full council meeting scheduled for 13 July was postponed because a report was not finalized. Shambolic is a word that springs to mind.

The lack of a local plan exposes applications to the jurisdiction of the Panning Inspectorate and is a developers charter as will no doubt transpire in the coming months. Whilst Spelthorne can refuse applications the lack of an agreed plan increases the likelihood of permissions being granted on appeal. No comfort can be taken from the Debenhams appeal. It was a badly constructed design and no doubt there will be further revised applications.

We are alarmed by the superficiality and triteness of this questionnaire. Detailed consultations were carried out in recent years and a sensible plan drawn up by Spelthorne which whilst not perfect took account of all residents' views. We can only assume you have sent this out so you can tick a box to say there has been further communication with residents. This exercise is a waste of space. Being at the start of the holiday period it is not feasible to properly seek the views of members. This is something officers and councillors should have done. They have not.

	<p>We are uncertain what conclusions you are seeking to draw from this questionnaire. The questions do not appear to lead the council to move to any meaningful changes or the affirmation of the support for the plan.</p>
<p>Priorities (not ranked in particular order):-          Designing places and spaces (e.g. heights of buildings          Protecting Green Belt          Affordable housing          Environmental protection          Infrastructure and delivery</p> <p>Mostly – but I am in disagreement with prioritising the Top 5          - They are all priority 1 – I cannot rate these 1-5</p> <p>There were other “top priorities” that were listed that did not make our Top 5....          These were meeting employment needs; leisure and culture – open space and recreation - which I assume also means provision of Libraries.          Managing Flood Risk is also a top priority – but we assume this will be dealt with by the River Thames Scheme. Likewise, further development of Heathrow Airport (3rd runway) is a major issue – but again will probably be a central government topic – except for car parks etc,          It is being proposed to move the car parking from the North to the South side of Heathrow, i.e into Stanwell. Hopefully it will not come to that.</p>	<p>We have endeavoured to make some input to this questionnaire, but our Association is concerned as to the need for it. Its very nature implies that the whole of the Local Plan is up for review, i.e. repeating the original consultations, which we think unnecessary and could well induce a great deal of risk of predatory developers’ activities.          There has been no mention as to how the council will defend against or refuse predatory developers’ applications during the “paused” period, even more important if the pause/delay is extended.          To reduce this process to a series of questions to determine what we would like in the future could mean completely ignoring what will be happening in the meantime.</p> <p>All the submissions to the original consultations were fully considered in producing the Local Plan. Therefore, once the newly elected councillors have all been appraised of its contents, the “pause” should be cancelled and the Local Plan review by the Planning Inspector resumed, as revisions can be made within the duration of the plan.          Consequences of delays due to this questionnaire/consultation are well known and impossible to complete, summarise and submit to the inspector before the December deadline which could result in a plan being imposed on the Council by the Planning Inspectorate, making any conclusions from this consultation superfluous.          The possibility of the government extending this deadline cannot be taken for granted and used as a reason not to proceed to meet the existing stated deadline.</p>

<p>One of my fellow directors made the following comment, which I'm inclined to agree with and fail to understand why the questionnaire has been presented therefore.</p> <p>"They don't exactly encourage completion when they say they can't promise to even read any of the responses!"</p>	<p>Over time we have watched the upkeep of Staines Town Centre and surrounding areas become an eyesore, due to the poor maintenance now by Surrey County Council. They are slow to respond to anything reported to them, as it is quite evident now they are not equipped to handle maintenance contracts etc.</p>
<p>Stanwell Moor is a small community compared to others in the borough. Many residents feel that we have been abandoned by both Spelthorne and Surrey County Council. There have been numerous attempts to build on green belt land in Stanwell Moor by companies and planning has not been strict in stopping work and they seem to be going ahead in destroying the green belt with no checks from the planning department.</p> <p>Stanwell Moor has flooded several times there are channels and ditches that have not have had any maintenance in years. It is very difficult to get anyone from the council or environment agency to do anything about this.</p> <p>We have many one bedroom properties in Stanwell Moor but they seem to have multiple people living in them. There are no schools, doctors or dentist are people have to go to Stanwell or Staines for these services. If Staines and Stanwell housing increases this will put an extra burden on these services and we might find ourselves out of the catchment zone.</p>	<p>Following on from point 5</p> <p>Since the building of Terminal 5 at Heathrow, we have had increase in traffic in Stanwell Moor this impacts on the health of the residents. They have widen the M25, which most days is at a standstill at certain times of the day. We would like to see better monitoring of air pollution. Taxis park in our village as well as meet and greet and holiday parkers. Heathrow have had twelve years to do something about this and have chosen to turn a blind eye, as well as Spelthorne BC and Surrey CC. This is impacting on residents being able to park their vehicles. We now have the situation where people are parking on pavements which has led to disabled people not being able to go out or been wheeled in the middle of the road. Spelthorne needs to have a closer working relationship with Heathrow to find a parking solution for all involved. I attended a recent local community forum meeting and not one representative from either councils were involved. We have Oakleaf Farm recycling centre, people are concerned about incinerator due to be placed there. There have been numerous complaints about the smell. We are not the wheelie bin of Surrey! We have several large articulated lorries using Horton Road which has a sharp bend, there have been at least two accidents recently. This road is not suitable for large articulated lorries and width restrictions up near the mill also need to be considered as many a lorry just ignore the weight restriction.</p> <p>Shops We currently have a local grocery store, laundrette and an Indian takeaway. There are two shops vacant. We did have a post office but this has</p>



	<p>now closed and we have no ATM so if you want any money you have to travel to either Stanwell or Staines. This can be difficult if using public transport as only one bus an hour.</p> <p>Several years ago a footpath/ cycle way was upgraded. This stops at the junction of Stanwell Moor Road and Horton Road. You can see terminal 5 but you cannot get to it safely either walking or cycling as there is no footpath. You have a busy roundabout which lies in the borough of Hillingdon. There needs to be some collaboration with other councils and Heathrow to improve the infrastructure to get to Terminal 5 if you want more people to cycle and walk. People would have greater access to public transport - underground, Elizabeth line and more buses. If existing footpaths and Bridleways were upgraded and maintained i.e bridleway 50 ( runs along the M25) you can cycle from Windsor and Egham, Staines without really touching a road. If you have children you don't really want to cycle along Stanwell Moor Road as you have to cross the crooked billet which is a very busy junction. You can't even cross if the lights aren't working which has happened to some of our residents.</p> <p>Housing Staines does not need to go the way of Woking- high rise structures. We live need an airport. Have people forgotten the Staines air crash. Can you imagine if a plane went into one of those.</p>
<p>This simplistic "list your preferences" questionnaire, is totally inappropriate for such a nuanced issue. It doesn't even include all the relevant issues, e.g. there is no mention whatsoever of the importance of Local Green Space, and therefore is likely to lead to misleading/manipulated conclusions. Given the considerable amount of work already done by LOSRA (and other RAs) it is a somewhat insulting exercise.</p>	<p>This questionnaire does not qualify as a 'consultation' at all – Appendix A in the reports pack of the latest Council meeting confirm this: "5.4 Members are reminded that any consultation with the RAs (whilst valuable as an indicator) falls 'outside' the public consultation as defined within the legislation which determines the local plan-making process."</p> <p>It therefore has no legal standing, and in our view cannot be used to justify any change to the Local Plan. Unlike Section 18, it has no formal status and is must not be used to gainsay the results of the Statement of Community Involvement (SCI) or to impugn the work already completed by Officers into the bargain.</p>

It should not be necessary to remind you the SCI has already been prepared and published in accordance with Section 18 of the Planning and Compulsory Purchase Act 2004 (as amended). This SCI set out how the Council proposed to involve the community in the preparation of the Spelthorne Local Plan, Supplementary Planning Documents (SPD), other planning documents and planning applications.

The Preferred options consultation was published in 2018 and it was Option 4 (Combination) to which this Association gave its support. In brief, this option proposed a combination of the three alternative options by increasing densities in town centres; releasing some weakly performing Green Belt land; making use of a Master Plan for Staines but with housing as one of a range of uses. 'LOSRA, like most RAs, have engaged with this process at every opportunity since spring 2018 (longer than most councillors)...

It should be noted that Option 1 (developing brown field) attracted most votes. However, LOSRA saw compromise (i.e. a combination; implying the sacrifice of Green Belt development within Lower Sunbury) as the fairest for the Borough as a whole.

Our position is perfectly clear and has been stated publicly many times before. Of course, we wish to defend Green Belt wherever possible, but we have long accepted that to achieve a sustainable Local Plan, and thus secure the protection from opportunistic developers we would wish for, some sacrifices have to be made, evidenced by the fact that we have not objected in principle to several of the Green Belt planning applications already in process in the immediate locality.

Nothing we have seen or heard since has altered this opinion.

	<p>We are most concerned that any delay in progressing the Local Plan as submitted exposes Spelthorne Council to predatory developers submitting opportunistic planning applications which, in the absence of a valid Local Plan, would almost certainly result in rejected applications being overturned on appeal.</p>
	<p>Repairing of pot holes should be high priority as the knock impact to road user vehicles add to running costs of vehicles. Would be a good feature to be able see some sort of quality control inspection as some of the repair work at times looks substandard. Also HGV Watch more visibility of the names of companies who break the 7.5 rule i.e. name and shame. The high number of vehicles who use Spelthorne lane n ignore the signs, the damage these vehicles have made to the kerbs and island is crazy</p>
<p>1. Our greatest concern is the extremely high housing target which the Plan seeks to address and the disproportionate share of this which is allocated to Staines. Agreeing a lower target would provide a context within which many of our other priority issues might be addressed.</p> <p>2. The riverscape of the Thames is a key feature of Staines (and now even part of our name) and we really feel that this is not adequately protected in the Local Plan so as to preserve its character, setting and views. The draft Plan (in the section dealing with the Thames &amp; its Tributaries) requires that “development proposals on the riverside should respect and make a positive contribution to enhance the waterside character, heritage value and setting” but the allocation of sites in Staines for high rise development close to the river and the weakness of the zoning provisions are clearly at odds with this policy objective.</p>	<p>We are very concerned that high buildings will be permitted in zones where height or density restrictions apply because the scope for granting exemptions is too great. The fact that the council itself is already proposing a zone-busting development on its own Thameside House site is clear justification for our concern.</p>

<p>Proximity of High rise developments to existing low rise housing ie why does the Local Plan have a Zone scheme which the Council itself is ignoring in the case of it proposed Thameside House development.</p>	<p>The current Housing target set and its impact on Staines Town is totally disproportionate and can only be met by building high rise accommodation across the town including in sensitive areas ( overlooking low-rise residential areas and the riverfront) and which questionably, doesn't meet the true needs for Spelthorne residents for the future.</p>
<p>The priority is submitting a plan which complies with government policy and will be found sound and accepted by the Inspector.</p> <p>This has already been done after five years of dedicated work by our excellent planning team, with full public consultation at all stages. Staines Town Society strongly opposes any attempt to delay or destabilise it.</p> <p>This questionnaire has no legal standing and is not a legitimate part of the Plan process. The choice of 5 priorities is pointless and may change with time. However we have listed 5 in case our response is otherwise disallowed.</p>	<p>We commend the planning team, who in very challenging circumstances have produced a workable Plan which has a good chance of being found to be sound by the Planning Inspector.</p> <p>The challenge has been to find a compromise between the wishes of residents and the requirements of planning law. The soundness of the Plan will be decided by planning law, in which there have been no relevant changes, and not on remarks by Michael Gove or other ministers. If Spelthorne BC submits a non-compliant Plan, it will be rejected by the Inspector, causing long delays while SBC gradually gives in and accedes to the Inspector's requirements, as is happening in Tandridge. During the delay period we will be exceptionally vulnerable to predatory developers, with the old plan out of date and the new plan postponed.</p> <p>Residents who do not understand this tension have naturally objected to items in the new plan, in the mistaken belief that they can be altered without making the plan unsound.</p> <p>Staines Town Society is particularly concerned that Staines will be unprotected from developers proposing more high-rise buildings in Staines during the planless period. The Debenhams application was successfully opposed by planning officers, at the Planning Committee and later in the planning appeal, but their case was not helped by the lack of an up-to-date Plan. The developers will return with an improved, but still unsuitable, proposal attempting to deal with the reasons for refusal, and there is a high risk that they will succeed.</p> <p>Residents have been fully consulted at each stage of the Plan development over the last five years, as specified in the legal plan process. This further</p>

	<p>consultation is a pointless waste of time and money, and seems to be just an attempt to cause further delay, particularly as it provides no explanation of the actual priorities or a timescale for action.</p>
<p>1. Housing Target - Staines should not take a disproportionate 57% of the entire Spelthorne Housing allocation</p> <p>2. Zoning - protecting riverfront, conservation areas and existing residential from adjacent overdevelopment.</p> <p>3. Design Codes - required to ensure good quality, first class architecture.</p> <p>4. Connectivity - to link transport hub, staines town centre and river.</p> <p>5. Communication - improved engagement to ensure all residents are provided clear, graphical and accurate representations of the full context of the plan. E.g. 3D visualisations/virtual reality for areas experiencing the most transformation.</p> <p>6. Consultation - to ensure residents most affected by change have the opportunity to influence decisions.</p> <p>This survey is misleading as all of the above 5 items we consider priority 1 issues and all the following were also considered to be a high priority:</p> <ul style="list-style-type: none"> <li>• Climate Change</li> <li>• Affordable Housing</li> <li>• Environment</li> <li>• Retail and local shopping</li> <li>• Leisure, culture, open spaces</li> </ul>	<p>One of the most contentious issues with the Local Plan is Staines being forced to take a disproportionate and unreasonable 57% share of the housing allocation which will damage the character and identity of the town. This question should be clearly and transparently put to residents. Residents within the Station Approach Residents Association area are particularly concerned about the Oast House Project. They do not want more high rise buildings surrounding their properties.</p> <p>There is an issue around lack of consultation and communication. Every resident we have spoken to has said they do not believe they have been given a clear and complete picture of the planned changes to Staines-Upon-Thames. They are reliant on word of mouth and a 3D visualisation produced by a local resident rather than the Council. There is a lack of engagement, lack of consultation and lack of accurate and transparent communication with regard to the Local Plan. For example, the removal of the NHS medical hub in the Oast House development is still not known by most and was an important factor to local residents.</p> <p>Our residents believe it is really important to upgrade the drainage and sewerage systems in this area. It is struggling to cope at the moment so the expected increase in population would overwhelm it. The developers should not get the go-ahead to build any new housing without being required to make a substantial and realistic contribution to improve the capacity of the local infrastructure (which in addition to schools and doctors surgeries we assume also includes drainage and sewerage).</p> <p>We feel this questionnaire is misleading and the results will be</p>

	<p>misrepresented. Limiting our response to only 5 issues and making us give them all different priorities is misleading. Many of these issues are all of a priority 1 but in this survey we are being forced to make them priority 2,3 4 or 5. This gives the impression that we do not consider them so important when in actual fact our Residents consider flood risk, tall buildings, infrastructure, sustainable transport as all high priority issues and highly contentious because we do not believe they are being properly and fairly considered for Staines-Upon-Thames.</p>
<p>We are aware that we have not completed this questionnaire in the manner requested. The reason for this is that the questionnaire is totally illogical, which in our view sadly reflects the poor standard of consultation throughout the whole local plan process. If you are asking residents to prioritise 5 items from a list of 18 options it would seem to presume that the majority of these options are mutually exclusive. However this is clearly not the case.</p> <p>As Spelthorne's climate emergency centre we are very clear that the Local Plan should respond to the climate and ecological emergency, as required the NPPF, paragraphs 152 - 173. This is particularly important given that the plan covers the time during which we have a last chance to prevent the sort of climate disasters currently being experienced around the world becoming the everyday reality for everyone, including the residents of Spelthorne.</p>	<p>A local plan that prioritises the Climate and Ecological Emergency would include prioritising</p> <ul style="list-style-type: none"> <li>• Designing places and spaces (e.g. heights of buildings) to create 15 minute neighbourhoods, minimise carbon emissions, create new green and blue infrastructure etc.</li> <li>• Heritage and conservation of existing structures to repurpose them for new uses, including housing. Existing buildings should only be demolished under exceptional circumstances.</li> <li>• Protecting Green Belt</li> <li>• Protecting the Colne Valley Regional Park</li> <li>• The River Thames and its tributaries being protected and improved in order to enhance biodiversity.</li> <li>• Green and blue infrastructure (e.g. tree planting, green walls and riverbank enhancements)</li> <li>• Biodiversity</li> <li>• Managing flood risk, which will be significantly increased under the current draft plan.</li> <li>• Environmental protection (e.g. air quality, noise and contaminated land)</li> <li>• Sustainable transport for new developments (e.g. parking provision, walking and cycling improvements, traffic impact)</li> </ul> <p>None of the above would be incompatible with</p> <ul style="list-style-type: none"> <li>• Meeting employment need</li> </ul>

	<ul style="list-style-type: none"> <li>• Retail and local shopping parades</li> <li>• Leisure and culture, open space and recreation</li> <li>• Infrastructure and delivery (e.g. schools and doctors' surgeries)</li> <li>• Homes for all (e.g. older people housing, type and size of homes, wheelchair accessibility, Meeting the needs of Gypsies, Travellers and Travelling Showpeople)</li> <li>• Affordable housing</li> </ul> <p>It is not clear what the inclusion of 'Heathrow Airport' means. For Talking Tree we would see that it is very important that there is no further expansion of Heathrow. Does this mean we should have identified it as a priority, or would this have indicated that we support the expansion of Heathrow?</p> <p>We cannot escape the thought that this questionnaire, like most of its predecessors, is designed to ensure that the council officers can argue that local residents have been thoroughly consulted, whilst at the same time ensuring that no meaningful information is gathered and there is no risk of local residents having any influence on the draft local plan drawn up by the previous administration. It is interesting to note that there is no mention of the housing number targets, even though there has been a significant shift in Government policy since the last consultation and it is now clearer than ever that there is no obligation on the council to use the number generated by the standard methodology. Adopting a lower number is the main factor that would enable the Council to respond more effectively to virtually all the priorities listed in this questionnaire.</p>
<p>Not entirely. We believe that "protection of local green spaces" should have been expressly set out which would be our priority number 2. It appears that this has been subsumed under "Leisure and culture, open space and recreation" and so we have designated this as our priority number 2 although our aim to protect green spaces is not</p>	<p>In relation to the need to protect all remaining protected urban open spaces (PUOS) as Local Green spaces (LGS) within Spelthorne's future Local Plan, we fully rely on our joint submissions to the reg19 consultation of the Council. These were submitted on behalf of the Spelthorne Green Belt Campaign, the Spelthorne Residents Association, Talking Tree CIC, It's Our Spelthorne, Residents for Spelthorne (R4s), Extinction Rebellion Staines, Stanwell's Green</p>

limited to their recreational and cultural value but also environment protection, biodiversity, carbon capture value (to counteract Global heating), air quality, flood risk mitigation etc.

We are also of the view that the questionnaire should have allowed further grading of the remaining priorities especially as a lot of priorities overlap. For us, biodiversity, conservation, the River Thames, Green and blue infrastructure, biodiversity, the mitigation of flood risk and environmental protection are all important.

Lungs and Local Conversation in Stanwell. The submissions have been attached to this email.

In short, we are fully supportive of the sites that the Council has accepted should be taken forward and designated as Local Green Spaces and agree that these sites (set out at section 2 of Spelthorne Borough Council's 'Local Green Space Review of submitted spaces' of January 2022) meet the criteria as Local Green Spaces.

For the detailed reasons set out in our joint response, we do, however, believe that the suggested refusal of the remaining PUOS sites is flawed/unlawful and that substantial parts of the Council's proposed methodology regarding the designation of Local Green Spaces (Local Green Space Assessment Methodology of October 2019) as well as the refusal reasons given by the Council in its 'Local Green Space Review of submitted spaces' (of January 2022) breach Government Guidance and the National Policy Planning Framework (NPPF).

Issue is taken in particular with the Council's blanket exclusion/refusal grounds and failure to carry out individual assessments against Local Green space criteria (set out in para.102 of the NPPF) of at least 43 sites on the basis that the sites were e.g. larger than 10ha (refusal reason for five nominated sites), are Green belt sites (19 sites), allotments (three sites), private playing fields (four sites) or school grounds (12 sites). (Please refer to the attached submissions to see which specific Spelthorne-wide sites we are referring to.) There is certainly no support for the Council's implied contention that Green Belt sites, private playing fields, school grounds and allotments do not or cannot (also) meet the requirements as Local Green Spaces. In fact, for the reasons set out in Government policy, in our joint submissions and in the initial

applications for Green space status, these sites meet the Local Green space criteria and ought to be put forward for designation as Local Green spaces in the Local Plan.



	<p>We hence call on the Council not to endorse the officers' suggested refusal of the remaining nominated sites (as these refusals are unlawful) but instead to also support their designation as Local Green spaces in the forthcoming Local Plan as a matter of priority.</p> <p>We note in this regard that 3,371 residents have also signed our petition calling on SBC to designate all 71 urban open spaces as 'Local Green spaces' (rather than leaving these sites without any protection after the abolition of PUOS status as suggested in the draft local plan).</p>
	<p>Infrastructure and delivery, Sustainable transport provision, and Managing flood risk were also considered important but these did not make the top 5 priorities.</p>
<p>The request to prioritise the above feels like a waste of time and an exercise to "tick a box" as a consultation. This cannot be classed as a consultation with Residents Associations. The fact is that RA's have been consulted through the construction of the Local Plan, for approximately six years, and whilst not ideal in every circumstance it is considerably better than the alternative. RA's are now in a perilous position where developers are circling and poised to take advantage of this totally unnecessary "pause". The priority should be that all councillors accept the Local Plan in its present state and trust the work that has been done by those beforehand and put aside personal views.</p>	<p>CVRA find the pausing of the Local Plan to be unnecessary and irresponsible. Our village is already seeing the consequence of this where a landowner who wants to develop has raised an appeal. Our fears are that with no valid Local Plan in place the Planning Inspectorate will have no guidance and may uphold the appeal.</p> <p>The initial reason for the pausing was to allow new councillors to receive training to fully understand the Local Plan. Now we find that a "Critical Friend" review has been instigated. To the layman this feels that a number of councillors wish to change the plan to reflect their personal preferences.</p> <p>Despite previous detailed consultations we find ourselves having to complete this questionnaire. There was clear agreement for RA's on the existing Local Plan but despite this we are having to complete this process with no clear understanding to its use. There has been no public statement/information on guidance for planning applications and appeals that take place during this three month pause and</p>

	<p>what defence can be applied. Developers quite rightly feel buoyed to present applications and appeals during this uncertain time.</p>
<p>Warning! A case of “Be careful what you wish for” Unless the existing/long discussed/developed “New Local Plan” is not progressed through the Official Legal processes and within a set timeframe, it will be highly likely that Spelthorne will have a National Government imposed Local Plan dictat “under special measures” by those who have little idea of our unique circumstances. Do Not Risk our future wellbeing in the hope of making changes to what is set by Statute Law. If we lose a not-so-perfect compromise of a New Local Plan then it could be replaced by something far worse, the Council will then have to live with a legacy of failure, collapse of credibility and trust with those who have spent many years contributing and trying to do their best for everyone, sweeping away irreplaceable links to what we hold dear of our flexible culture of living and working here, in a Borough bounded by the Thames/shaped by its waterways and unnatural water features.</p>	<p>Making the best of it has been the nature of this Borough.</p> <p>Having to send in this “pick n mix” return after so much discussion and so deep into the Local Plan process, I find it difficult to know what is the best way to indicate a fair and realistic guide of painting a picture illustrating priorities from our relatively small area as part of a wider and complex profile. To remain impartial involves standing up, over many years and discussing/debating openly the issues that face us into the future. Be aware that reacting to the latest short term hot topics may be clouding the long term goals of sustainability, survival of our independent administration. We must not be lost in a dumbed down standardisation where we lose all grass root control and influence, albeit within a central government set framework.</p> <p>Setting a list of priorities from a complex web is impossible.</p> <p>Please give consideration to the following, that hitherto may not be recognised as important but with hindsight, and over the passage of time may be an obvious answer to our long term needs.</p> <ul style="list-style-type: none"> <li>● Embrace our natural asset, the Thames and lands surrounding.- develop businesses and recreational facilities built on our world beating heritage and use this as a business spring board.</li> <li>● A model that should be explored is floating dwellings as used successfully in the Netherlands. Spelthorne Borough has a large surface area of water, bodies of water of what was viable land. The Local Plan should include a sustainable</li> </ul>

	<p>development plan to exploit water bourne resources which would take pressure off precious packages of “green belt” land and the remaining natural tracts of land.</p> <ul style="list-style-type: none"> <li>● In all planning matters “the silent majority” must have a say. Nature, the “big silent elephant in every room” must have a say, a default representation at the table. Create ways to enhance and build back connectivity with all natural habitats to invite the natural world back into what was their world before unadulterated and uncoordinated growth evicted very necessary life which underpins our own wellbeing and recovery. There are more and more ways being explored and found to be beneficial and less costly to our long term survival. It’s up to us to open doors and let new air and light into our thinking.</li> </ul> <p>Get the LOCAL PLAN signed off before a far worse alternative is imposed upon us.</p>
<p>1 The ‘HOUSING TARGET’ for Staines-upon-Thames is the CRITICAL OVER-RIDING PRIORITY ISSUE. A MUCH LOWER TARGET would provide the context for solving all five key priority issues listed above.</p> <p>2 Protection of the River Thames is a key priority, but we have not identified this in the list above because dealing with priorities 1 and 2 (above) would take care of the priority issues of concern.</p>	<p>6.1. We cannot emphasise enough the FUNDAMENTAL AND CRITICAL PROBLEM created by the HOUSING TARGET ALLOCATED TO STAINES-UPON-THAMES.</p> <p>6.2 Setting priorities 1 to 5 is a bit simplistic and misleading. For us, 1 and 2 are of equal importance with issues relating to infrastructure and protection of heritage very close behind.</p>
<p>overwhelmingly residents are resentful of too much development being loaded on to Staines and that they feel that the housing target should be reduced. 80% of respondents mentioned this as the first priority. They commented that the result will radically alter the town and make it a less pleasant place to live. One comment was that</p>	<p>lack of infrastructure and flood risk were also issues considered higher in importance on the list than other subjects</p>

the empty office space should be utilised by conversion to affordable homes.	
--	--

**Points to note:**

- when asked the questions 'how many residents does your association represent', some RA's responded with the number registered, and some responded with the population of that areas so this will be difficult data to utilise
- Shepperton Green Residents Association marked their 5 priorities as number 1 priority. This is therefore showing a blank answer in question 4. The 5 priorities are added into the narrative in question 5 instead.
- Talking tree marked 13 priorities for priority number 1, it therefore is reflected in the overall responses as blank
- Spelthorne Green Belt Campaign also sent their original submission to the Local Plan consultation for consideration by Group Leaders