

From: [Keep Kempton Green](#)
Sent: Tuesday, November 25, 2014 1:34 PM
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Subject: Local Plan Review

Mr John Brooks
Head of Planning
Spelthorne Borough Council

25 November 2014

By email to j.brooks@spelthorne.gov.uk

cc: Spelthorne Residents Associations, Spelthorne Borough Councillors

Dear Mr Brooks

Local Plan Review

It is getting on for four weeks since your last email on 30 October to us on the subject of working with local communities on the ongoing Review of our Local Plan.

As was discussed at the quarterly meeting of the Planning Department and Residents Associations on 6 October, and subsequently in our exchange of emails, the Planning Practice Guidance issued by the Department of Communities and Local Government (Paragraph: 007 Reference ID: 2a-007-20140306) states that local communities:

“should be involved from the earliest stages of plan preparation, which includes the preparation of the evidence base in relation to development needs.”

In your email you said that it would be “some while before I will be in a position to let you know exactly what arrangements the Council will put in place”. Since we will need to prepare in advance for our participation in this ‘working together’, please could you indicate how long this “some while” will be.

In this regard, please could you make the following available to us:

1. In particular, the report referred to in paragraph 2.1 of the document titled Local Plan Working Party, Wednesday 3 September 2014, Report of the Assistant Chief Executive:

“At the Working Party’s meeting on 7 and 30 January 2013 a report was presented which assessed the Core Strategy and all the other policy documents (Allocations DPD, Saved Local Plan Policies and SPDs) against the National Planning Policy Framework (NPPF).”

2. In particular, the background work/evidence which justifies the following statement in paragraph 2.28 of the same document:

“... on the basis of currently identified housing land availability in the period to 2026 we could sustain a net build rate of around 204 dwellings per annum across the 20 year period to 2026.”

3. In particular, the background work/evidence which justifies the following statement in paragraph 2.39 of the same document (and a very similar statement in paragraph 2.52):

“The scale of likely future housing needs is predicted to be beyond what the current Core Strategy and Allocations DPD can provide for. In this respect alone these plans are therefore not up to date.”

4. In general, all background papers to the Report of the Assistant Chief Executive, which, since it has now been considered by Local Plan Working Party, the Cabinet and the full Council, are required to be made available by the provisions of The Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 .

5. All information, including maps and graphics, held by Spelthorne Council dated later than 1 January 2013 relating to bus routes and bus services in the Borough of Spelthorne.

Please regard all of the above as also being a formal request under the Environmental Information Regulations 2004.

Kind regards

Alan Doyle

for Keep Kempton Green

From: [Brooks, John](#)
Sent: Thursday, October 30, 2014 4:58 PM
To: '[Keep Kempton Green](#)'
Cc: [Devonshire, John](#) ; [Dawes, Geoff](#)
Subject: RE: Quarterly Meeting of RAs and SBC Planning Dept

Alan

Thank you for your email. I apologise I had not as yet replied to your earlier email.

As I explained at the recent Residents Association meeting we are at a very early stage in the Local Plan review having only just decided as a Council to embark on this. We have very limited staff resources available at present for this work and there are wide range of matters we need to look at in planning out how to best progress.

I therefore envisage it will be some while before I will be in a position to let you know exactly what arrangements the Council will put in place to meet the various statutory and other requirements – including those you refer to.

Regards

John Brooks BSc, Dip TP, DMS, MRTPI, MCMI
Head of Planning

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From: Keep Kempton Green [<mailto:keepkemptongreen@hotmail.co.uk>]

Sent: 30 October 2014 15:07

To: Brooks, John

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arbrook1meadow@talktalk.net; John Hirsh

Subject: RE: Quarterly Meeting of RAs and SBC Planning Dept

Dear Mr Brooks

I would be most grateful if you could let us know how far you have progressed with considering how working with residents will be incorporated into the work programme for the housing evidence base, and other parts of the Review of our Local Plan.

You are no doubt aware of the Good Plan Making Guide recently published by the Planning Advisory Service:

http://www.pas.gov.uk/web/pas1/local-planning/-/journal_content/56/332612/6627529/ARTICLE

which reinforces the Guidance from the Department of Communities and Local Government (Paragraph 007 of the Guidance, Housing and economic development needs assessments) as to the need to work with local communities in preparing the housing evidence base.

I look forward to hearing from you.

Alan Doyle
for Keep Kempton Green

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Subject: Re: Quarterly Meeting of RAs and SBC Planning Dept
Date: Wed, 8 Oct 2014 11:17:53 +0100

Dear Mr Brooks

Thank you for Monday evening's meeting with the various Spelthorne Residents Associations. Please thank your colleagues for their presentations on the CIL and the various changes to the Planning Orders. Very useful information.

On the main agenda item – the review of our Local Plan - I think it is fair to say that there was a full and frank exchange of views, which is to be welcomed. I appreciate that the Planning Department has its own opinions on the detail of how the review will be conducted. But I am not exaggerating when I say that there is growing unease among residents throughout the Borough about this review, which will have profound implications for us all, whatever its outcome. You may wish to characterise KKG as some rogue elephant which has wandered into the Spelthorne maize patch (and I did appreciate the humour, and look forward to receiving the PowerPoint slides) but KKG is followed by a lot of people throughout the Borough through our email list and the website and social media.

More importantly, you will have noted the comments expressed around the table by the Green Street Action Group, the Kempton RA, LOSRA, the Manor Farm RA, The Staines Society, and the Stanwell Moor RA, who collectively

represent hundreds of households from the four corners of Spelthorne.

More specifically, the following are the points I would like to make in this regard:

1. I am very glad to hear that, at your meeting with The Jockey Club and its chief development consultants on 20 February this year, you told them that the Council would not be bounced into approving a development at Kempton Park. The reason I am glad to hear that is because that is demonstrably not the approach which had been taken prior to that meeting. Pre-application advice to potential developers is one thing. The evidence shows that the conversations between the Council and The Jockey Club went much further than that.

But that is, to some extent and for our present purposes, by the by. There is now the much bigger issue of the review of our Local Plan.

2. What we have found out so far has largely – but not only - been the result of reading the documents discussed at the meeting of the Local Plan Working Party on 3 September. As I mentioned on Monday evening, I was sent a number of what appear to be full sets of those documents, as well as less complete sets. The vast majority of the documents were already in the public domain prior to the meeting. The two that were not were the Report of the Assistant Chief Executive, and the draft copy of the 2014 Planning Monitoring Report.

KKG did not publish the draft 2014 PMR – it was clearly marked as being a draft. In any case, the final approved version is now available on the Spelthorne website.

This matter of the Local Review has now been considered by two Spelthorne Committees – the LPWP on 3 September and the Cabinet on 30 September. The legislation in its various forms is clear – the Report is background information considered by the committees in coming to their separate decisions, and therefore does not qualify as being confidential. I am sure that the people who sent KKG copies of the various documents also took this view – that this was not confidential information. It certainly was not referred to anywhere, or marked, as such.

3. The legislation and guidance (the Local Authorities (Executive Arrangements)

(Meetings and Access to Information) (England) Regulations 2012, and the Practical Planning Guidance published by the DCLG) are also very clear as to the involvement of the public in this Review of our Local Plan.

LOSRA has already set out the provisions of the 2012 Regulations in a previous exchange of emails, so I will not repeat them here. But I fully endorse what John Hirsh of LOSRA said on Monday evening about this. I think he is entirely correct: that meeting of the LPWP should not have been held in private. I would also endorse what Anne Damerell of The Staines Society said: that this issue of the review of our Local Plan is too important to be kept from residents.

After all, there is no law that says that you have to do things behind closed doors.

We are well past that LPWP meeting now, but John Hirsh's point relates just as strongly to the ongoing process. His point is reinforced by the Guidance – Paragraph 007 of the Guidance, Housing and economic development needs assessments dated 6 March 2014, titled:

“With whom do local planning authorities need to work?”

The relevant paragraph is worth repeating (my highlighting):

Local communities, partner organisations, Local Enterprise Partnerships, businesses and business representative organisations, house builders, parish and town councils, designated neighbourhood forums preparing neighbourhood plans and housing associations should be involved from the earliest stages of plan preparation, which includes the preparation of the evidence base in relation to development needs.

Please note: the phrase ‘work with’ means a specifically more collaborative process than just public consultation (whereby residents are presented with a complete document which can only be tinkered with). Rather, residents are entitled to have a meaningful input into the preparation of the evidence base. You will be aware, I am sure, of just how much expertise exists among residents in dealing with such work.

As the minutes of the LPWP make clear, and as you said last evening, one of the things which the LPWP and the Cabinet have authorised is:

That Officers report back as early as possible on a proposed outline timetable/work programme and resource implications.

You also graciously said last evening that you would consider, when drawing up this timetable/work programme, how “working with” residents can be incorporated into this timetable/work programme.

I look forward to hearing from you, as a matter of some urgency, as to how you propose this should be done.

Kind regards

Alan Doyle
for Keep Kempton Green