



**London  
Irish**

Planning Policy Team  
Spelthorne Borough Council  
Knowle Green  
Staines-upon-Thames  
TW18 1XB

25 June 2018

Dear Sirs

**Spelthorne Council Local Plan - Issues and Options Consultation - May 2018**

This letter of representation is written on behalf of London Irish Holdings Ltd and is submitted in response to the Spelthorne Local Plan Issues and Options consultation.

We recognise that the consultation document sets out the key issues affecting Spelthorne and the options that the Council may consider in order to meet the Borough's needs. The consultation document identifies the challenges and constraints for development but also the opportunities Spelthorne offers for growth.

We note that the representations received will be used to help develop the new Local Plan to the next stage of Preferred Options, where the Council will set out what it considers to be the best strategy to meet the Borough's needs. The Preferred Options will include specific sites for possible allocation and is expected to be published at the end of 2018.

With this in mind, we set out our overarching comments on the Issues and Options document below.

Whilst these comments are framed around the current National Planning Policy Framework (NPPF), we expect that the government will publish the final version of the revised NPPF by the end of July 2018. Whilst there is still some uncertainty surrounding the final version of the document, our comments reflect on the potential impact of the proposed changes to the NPPF and the emerging Local Plan for Spelthorne where appropriate.

**1. Housing Needs**

The current housing target for the area is set out in the adopted Core Strategy and Policies DPD which conformed to the approved South East Plan (now revoked) and required 3,320 dwellings to be provided in the period 1 April 2006 to March 2026. This equates to an annual average of 166 dwellings over the 20-year period.

However, the Council will need to ensure that its emerging housing target (to be outlined in the emerging Local Plan) seeks to address the objectively assessed housing needs of the

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district and therefore it is more than likely that a significantly higher housing target will be taken forward through the emerging Local Plan.

In November 2015, the Council published its Strategic Housing Market Assessment (SHMA) which was prepared by GL Hearn and covers both Spelthorne and Runnymede Borough Council areas. The report identifies that the demographic starting point for housing need in Spelthorne equates to 511 homes per annum for the period 2011-2031. This equates to 10,220 homes over the 20 year period.

The report also considers the housing need based on economic forecasts and considers that a housing need of 722 homes per annum (14,440 homes over the 20 year period) would be required to enable Spelthorne to meet its economic aspirations.

However, the Council sets out that the new standard methodology for calculating objectively assessed needs (as set out in the Government's consultation – Planning for the Right Homes in the Right Places - September 2017), will require the Council to deliver 590 dwellings per annum (dpa) over the next 15 years. This is significantly less than the Council's 2015 SHMA figure of 722 dpa to support the expected jobs growth in the Borough.

However, it should be recognised that the new OAN of 590dpa is heavily based on addressing rising levels of unaffordability and does not taken into account employment growth. Whilst it is therefore reasonable given the timescale for plan preparation and submission for the Council to consider the standard methodology, we would suggest that this should be seen as the starting point for assessing need. Such a position is supported in the draft NPPP and draft PPG published by the Government earlier this year.

Given that the economic growth scenario suggested a much higher level of housing need, this would suggest that the Council should be planning for a much higher level of housing growth. As well as considering the growth aspirations for the area, the Council's housing needs assessment will also need to consider whether an increase in the total housing figure will be required to help deliver the number of affordable homes needed.

While the standard methodology will provide the baseline for establishing the Council's housing requirement, it is reasonable to suggest other factors will need to be considered in establishing the final level of 'housing need' that the Council will be required to meet. These factors will need to be considered within a new SHMA as we consider the current version published in 2015 to be out of date and not reflective of the most up to date data with regard to demographics and the cost of housing within Spelthorne.

## **2. Green Belt**

In considering whether or not to amend Green Belt boundaries it is important to consider whether there are exceptional circumstances to support any amendments. Whilst the current NPPF provides no explanation as to what constitutes exceptional circumstances, the draft NPPF provides some guidance in paragraph 137 as to when they are likely to be relevant.

The revised NPPF requires that the Council must have exhausted all opportunities for development on brownfield sites prior to the amendment of Green Belt boundaries including increased densities and whether there are opportunities in other boroughs to help meet

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needs. We note that Spelthorne has published its Strategic Land Availability Assessment (SLAA), which looks at how much land is available in the Borough that could be developed for housing. However, it does not include land currently within the Green Belt, flood risk areas or sites subject to other constraints that would rule it out for development. It also only looks at developing sites at a scale and density that would fit in with existing buildings in the area.

The SLAA identifies that the annualised figure of how many homes can be built is only 428 per year. This is 162 dwellings per annum less than the baseline standard OAN figure of 590dpa. Based on a Local Plan period of 15 years, this would mean that land for at least 2,430 homes would have to be found elsewhere in order to meet the baseline figure of 590dpa.

Given that the SLAA has considered all available brownfield and non-green belt options, this would suggest that green belt options will need to be considered in order for the Council to plan to meet its full housing needs.

### **3. Strategic Options**

We note that the Council has identified four potential options for meeting the required level of growth in the Borough. These are considered in turn below.

#### **3.1 Strategic Option 1:**

This option aims to meet all of the Borough's needs for housing, employment and other development in the urban area without amending Green Belt boundaries by:

- Significantly increasing densities of all potential housing sites, particularly those in town centres and near public transport facilities, including well designed high rise development;
- Prioritise meeting housing need and relax policies that protect employment sites to allow more conversions and redevelopment for housing schemes; and
- Build on open space and re-provide sports and recreation facilities in the Green Belt.

As the SLAA suggests, this option is unlikely to be able to meet the full housing and employment needs of the Borough, particularly if housing is prioritised over other forms of development such as employment. The loss of employment land would also lead to an increase in 'out-commuting' which would add pressure to local transport infrastructure.

In addition, significantly increasing density on brownfield sites could lead to adverse impacts on local character which could be damaged by high density development.

Whilst some densification may well be achievable, there will be significant additional construction costs arising from such an approach that will limit the contributions such development can make to meeting affordable housing needs and, as the Council has noted, any additional infrastructure required to support development.

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We would also be concerned that such an approach would require significant lead-in times to take account of the necessary master planning required to deliver significantly higher densities in and around town centres. Such lead in times could mean that the Council struggles to demonstrate a five year housing land supply.

Finally, not all urban locations will automatically be the most sustainable locations for new development.

In light of the above, we do not consider that Strategic Option 1 on its own will be sufficient to meet the housing and employment needs of the Borough.

### 3.2 Strategic Option 2:

Strategic Option 2 aims to release large areas of Green Belt for housing and other development by:

- Amending the Green Belt boundary significantly to meet housing and employment needs;
- Safeguarding land in the Green Belt for future need beyond the plan period; and
- Retaining Green Belt designation only for sites that are strongly performing and/perform a strategic green belt function.

Although this option on its own would be unsuitable, the release of green belt sites will be necessary to meet the full housing and employment needs of the Borough.

As it stands, the Council's latest Green Belt Assessment only considers large parcels of land which, by consequence, are more likely to perform a strategic Green Belt function. A more fine grained analysis of smaller green belt sites is likely to demonstrate that there are suitable sites that could be released without detriment to the wider green belt.

### 3.3 Strategic Option 3:

Strategic Option 3 seeks to focus new development opportunities in Staines-upon-Thames by:

- Making use of a Master Plan approach for development that increases opportunities for new high rise residential buildings;
- Significantly increasing densities in the Staines area, not just within the central core, where easily accessible to the town;
- Prioritising housing need by allowing employment sites such as offices to be converted or redeveloped for housing; and
- Allocate sites for housing elsewhere in the Borough but only at a density similar to surrounding development.

Similar to our response to options 1 and 2, this option alone is unlikely to enable the Council to meet its full housing and employment needs without detriment to the character and appearance of the existing settlement and without impacting on employment needs.

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### 3.4 Strategic Option 4:

Strategic Option 4 is essentially a combination of the other three options by:

- Increasing densities in town centres and near transport facilities and other areas where the character can accommodate it and allowing high rise development in areas where there are existing tall buildings and they are of a high quality design;
- Releasing some weakly performing Green Belt land for development where its release would not adversely affect the integrity of the strategic Green Belt; and
- Making use of a Master Plan approach for Staines but with housing as one of a range of uses that can be accommodated within the town and not favouring residential development over employment, retail and tourism uses.

In light of our views above, we strongly recommend that the Council pursues Strategic Option 4.

However, it would appear that this option excludes larger releases of Green Belt land in order to meet needs. Whilst we support the fact that the Council under this option would seek to identify smaller sites within the Green Belt, it should not discard those elements contained in Option 2 in relation to more significant release of Green Belt if this were to meet the housing needs of Spelthorne.

Small and medium sized allocations are essential if the Council is to maintain a supply of sites in the short to medium term. But it will also be necessary to identify and allocate larger sites in the Green Belt to come forward later on in the plan period if the Council is to meet its development needs. Such an approach will also enable a wider mix of housing types to be provided to meet the variety of needs that are likely to occur within the Borough over the next 15 years and allow the Council to improve its delivery of affordable housing across the plan period.

We are happy to participate in this consultation and would certainly welcome further discussions with the Council on the emerging Local Plan. If you require any clarification on the above, please do not hesitate to contact Mark Bensted, Director at London Irish Holdings Ltd at [mark.bensted@london-irish.com](mailto:mark.bensted@london-irish.com)

Yours faithfully



**Mark Bensted**  
**Director**  
**London Irish Holdings Ltd**