

Dear Sir,

Spelthorne Local Plan: Preferred Options

Public Consultation Jan 2020

We would like to thank the Planning Department for all the hard work & rigour they have invested in producing this document. We also acknowledge the Council's letter to Government contesting the unexpectedly high number of houses to be realised each year for the next 15 years & hope the Council will be successful in negotiating a reduction from the present allocation dwellings sooner rather than later.

Monitoring & Review

More than 9000 new dwellings is very high for a compact borough such as Spelthorne & we understand it would not have been this high had the actual figures for household growth in 2016 been taken into consideration. However, this goes to show just how volatile household growth rates can be, being affected by both macro-economic & micro-economic factors at different points in time. This makes it all the more important that local household growth rates are continually monitored & housing needs dynamically adjusted in an open & transparent manner over the 15 years term of this Plan.

Commercial Developments Omitted

The Laleham Residents Association are pleased that there are no significant housing developments directly affecting the Laleham historic village area. However, there is no mention concerning future commercial developments. Laleham residents are already blighted by a number of close-by commercial developments including:

- a) Shepperton Studios 90-acre expansion over highly performing green belt at Laleham Nurseries,
- b) further mineral extraction, this time at Manor Farm
- c) the overrun of mineral extraction at Littleton Lane followed by the delayed site restoration & proposed implementation of a business park replacing previous industrial estate/processing area.

We understand the rules for preparing a planning document such as this would normally exclude consideration of "other developments" until they have received full approval. However, the scale & proximity of Heathrow & imminence of its proposed expansion for R3, which would increase its air traffic movements by >50% & increase passenger throughput by almost 100% from 2016 levels, cannot be ignored. Whether or not the full R3 expansion is approved in full, it is highly probable Heathrow will continue to operate & continue to expand for the foreseeable future. Spelthorne is already a rat run for airport traffic & HAL will continue to seek off-airport parking in Spelthorne to accommodate passenger expansion. It would be remiss of the Council if consideration of Heathrow & its associated impacts on the Borough were omitted from this Local Plan

Increased Public Services Provision & Infrastructure

While it is appreciated the Local Plan process comprises a number of gated stages, we have grave concerns that the proposed Borough-wide increase in dwellings & the associated population growth need to be matched by corresponding expansion of services such as health care, NHS, hospitals, doctors surgeries, schools, social services, leisure & recreation facilities, waste, sewage, etc., and that there should be no degradation in quality of life for residents arising from the new builds.

We trust that Reg 19 will detail in full what improvements will be required from 3rd party stakeholders to support Spelthorne proposed housing expansion. We would like reassurance from the Council that should any 3rd party stakeholders be unable to commit the proposed plans that the Council will revisit the proposed build out & make appropriate adjustments.

In addition, we would like to see a series of linkages established which ensure that all Spelthorne housing developments during the term of the Plan are matched with a corresponding expansion to all public services & infrastructure & should these improvements be delayed, for whatever reason, that the rate of housing development will be restrained accordingly until the services level has been restored.

A simple, web-based, dashboard-type presentation could easily be developed such that all stakeholders could observe the progress of all aspects against the Plan in a publicly-accessible & transparent manner provided the numbers are recorded & updated on a regular basis, say every 6-months, by the Council.

Green Belt

We trust the Council will follow the obligations of the National Planning Policy Framework 2019 (Sec. 138) to preserve as much Green Belt as possible for as long as possible. Given there is every possibility within the next 15 years that the rate of housing growth may saturate or fall, we recommend the proposed development sites are released in stages such that all brown fields sites are released & fully utilised before any release of the proposed green belt sites.

NPPF 2019 Sec.138 also includes the following: *"...(plans) should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality & accessibility of remaining Green Belt land."* If this has already been included in the Plan regarding the proposed 19 Green Belt plots provisionally approved for development, would you please advise where we can find further details &, if not, when can we expect to hear further details?

The Local Plan declares that the 19 Green Belt plots are being proposed for new housing developments representing a loss of 1.6% Spelthorne Green Belt area. If Green Belt loss is to be reported then why not include non-housing developments such as Council Depot, White Lodge, Charlton Waste re-cycling centre, Shepperton Studios (90 acres), fire station (to name but a few) which will remain designated as Green Belt without any plans detailing how & when they will be restored to Green Belt (as generally would occur at mineral extraction sites)? In addition, this completely ignores the possibility of Heathrow Airports Ltd implementing their full R3 expansion wherein they have earmarked a further 7.5% of Spelthorne Green Belt for car-parking, warehousing,

offices, waste processing & other airport services including land which will be re-purposed for road & rail access to the airport access.

These reductions of open Green Belt are progressive & yet there appears to be no corresponding recommendations for converting other areas to replace lost green belt. Thus it would appear the total figure for Green Belt loss in Spelthorne is significantly greater than the 1.6% declared. We hope the Council will be able to clarify their position in full by providing a full breakdown of the true loss of Green Belt in the near future.

Sustainable Growth

The Council has been outspoken that all the proposed new developments will be sustainable. However, from the various reports & public meetings, we understand this very much revolves around policy changes whereby new residents will be “encouraged” to use an improved public transport system rather than private cars. This will be supported by concentrating new developments close to transport hubs & by actions such as limiting residential parking spaces for the new homes, reducing the number of public parking spaces & raising parking fees.

Given that most of the proposed new dwellings will be in MDU, the majority of residents are more likely to be young & living in their first property. Has the Council conducted any surveys regarding demographic car ownership in existing MDUs in the area? The concern here is that many residents will have company vehicles, especially vans, which may not easily comply with the measures mentioned above.

Getting residents to forgo their own car will be very difficult to achieve and will require radical changes in social behaviour. Changing the social behaviour of a group or all of society will be a challenging proposition. Technology led changes such as adoption of internet TV, introduction of electric cars, adoption of mobile phones, etc., which are generally commercially-led, can be shown to take around 10 years to achieve a significant penetration, while government-led societal campaigns such as smoking reduction, obesity reduction, organ donation, etc. tend to take much longer, even though one could argue the benefits are greater. Change of this kind simply will not work if only introduced on a local level; it needs to be a national campaign. Would it not be better for the Council to be more open regarding the necessity of this change & sell it as part of a Government-led campaign to reduce climate change?

Has the Council considered the implications of car-sharing, e.g. ZipCar, or peer-to-peer car-sharing schemes & would the Council consider adopting pro-active policies to encourage deployment of car sharing schemes if they were proven to significantly reduce private car ownership? For example, shared cars could be allocated priority spaces close to transport hubs (with charging points when the market share for electric cars achieves sufficient mass) & could be used to address those journeys that, by reason of destination, time of day/duration or physical load, cannot be readily fulfilled by public transport.

Regardless, it will be a considerable challenge to avoid parking congestion in the urban centres given the increase in dwellings. Deliberate re-purposing of existing public car parking for new homes must be tempered against the parking needs of the existing residents.

Traffic congestion remains a major concern for Laleham residents. We understand that should (RL1/007) adjacent to Worple Road be released for new houses there will likely be issues for Brett's

vehicular access to the mineral extraction on Manor Farm. Laleham Residents Association would be opposed if there was subsequently an application to gain access for operations traffic via the site entrance on Ashford Road.

We trust the Council will take our suggestions, comments & views into consideration, not only for the current phase but also Reg19 to which it is inevitably linked.

Yours faithfully,

Eric Sloan
Committee Member
On behalf of Laleham Residents Association