

Spelthorne Borough Council New Local Plan - Preferred Options Consultation Response by LoSRA

The following is our response to the preferred options consultation¹ as it relates to the revision of the Local Plan and is detailed under the four headings:

1. LoSRA Policy on Green Belt
2. The Stratton Road Site Assessment (site ID HS1/010)
3. Developability of the Stratton Road Site.
4. Use of Outdated Projections to Justify Housing Need

1. LoSRA Policy on Green Belt

It is our long-established policy is to oppose development on Green Belt as a matter of principle. As noted in the Issues and Options consultation, Spelthorne Borough Council's strategy involved "Releasing some weakly performing Green Belt land for development where its release would not adversely affect the integrity of the Strategic Green Belt". However, once LoSRA concede that it might be acceptable for any sites which are 'weakly performing' when judged against Green Belt criteria to be made available for development, planning consultants would treat it as the green light to quote such a move as a precedent which could undermine any opposition we might express to development on other sites. We also have a duty to residents living near the proposed development sites who rightly expect us to oppose their release for housing.

We are very concerned about precedents being set and parts of the Green Belt, particularly at the edge, being 'nibbled' away making it harder to defend the next piece of Green Belt land - the cascade effect.

LoSRA strongly support the retention of Kempton Park as Green Belt by virtue of it being Strongly Performing; also the catastrophic impact it could have on infrastructure in and around Lower Sunbury if development were ever to be permitted on this site.

There is a briefing on the House of Commons Library website which serves as a straightforward summary of Green Belt policy. The briefing examines how policy and controversy around the Green Belt were reflected in the updating of the National Planning Policy Framework (NPPF) in 2018 and which noted that "Government policy on protection for the Green Belt is set out in chapter 13 of the NPPF 2018, which opens by stating that:

The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."

Four parcels of Green Belt land have been identified for allocation in the Lower Sunbury area, as follows:

- Land at Croysdale Avenue (ref no: HS1/002)
- Land East of Upper Halliford, Nursery Road (ref no: HS1/012)
- Land South of Nursery Road (ref no: HS2/004)
- Land to South and West of Stratton Road (ref no: HS1/010)

¹ [New Local Plan Preferred Options Consultation](#)

The first site was assessed in the Arup Stage 2 Green Belt report (GBA2)² as weakly performing against the National Planning Policy Framework (NPPF) criterion and as having a less important Green Belt Strategic Role. The next two sites, which are east of Upper Halliford Road and south of Nursery Road, were examined in the Arup Stage 2 Green Belt Assessment report (GBA2) as part of a larger area, referred to as sub-area 32-a, which includes these two sites at its northern end and extends to Orchard Drive at its southern end. Arup reported that sub-area 32-a meets the NPPF criteria strongly overall, but also noted that the northern part of the area, which includes the two Green Belt sites (HS1/012 and HS2/004) “perform less strongly against the NPPF Purposes”. Due to the amount of detail involved, LoSRA have been unable to research every site in Lower Sunbury proposed for development to the same level of detail, so we have focussed our comments on one – the Stratton Road site – but the arguments apply to a greater or lesser extent to all the sites proposed for allocation.

2. The Stratton Road Site Assessment (site ID HS1/010)

This site was originally included within Local Area 32 in the Arup Stage 1 Green Belt (GBA1)³ report. Local Area 32 was assessed against the NPPF criterion as "strongly performing". It also performs an important strategic Green Belt function being on the edge of Strategic Green Belt Area A and the urban area. The area also straddles Strategic Green Belt Areas A and B and helps to maintain the separation between the London fringe settlements and the settlements to the south west and between Ashford/Sunbury/Stanwell and Upper Halliford.

The GBA1 report also indicated that a number of the Local Areas could be subdivided and assessed in more detail to potentially identify weakly performing sub areas within a Local Area. Local Area 32 was subdivided and the area to the north (above Croysdale Avenue, Stirling Avenue and Park Avenue) identified as Sub Area AC13, was considered separately. It was assessed in GBA1 that although this sub area was meeting the NPPF criterion, albeit to a lesser extent than the whole Local Area 32, it was considered to be less critical in maintaining the Strategic Green Belt gaps. The GBA1 report states in the assessment of the sub area that they (the consultants Arup) "*judge that this area would not constitute an outward sprawl of the existing built up area and would not fundamentally undermine the integrity of key gaps between settlements at the strategic level*". We would take issue with this judgement. We believe that this is exactly the type of site we do not wish to see allocated as it is currently right at "the edge" of existing urban development, has not been assessed to be weakly performing Green Belt (see below) and importantly bridges Strategic Green Belt Area A and B.

Green Belt Assessment 2 (GBA2) subdivided Local Area 32 into a number of sub areas (sub area AC13 used in the GBA1 was no longer used). The new Sub area 32-o approximates to the Stratton Road site allocated for development although Sub area 32-o also includes the gymnasium on its western boundary. The sub area is assessed again using the NPPF criterion and it is assessed to be MODERATELY performing Green Belt. Purposes 1 and 2 are assessed as 3+ and 3 but Purpose 3 "*Assist in safeguarding the countryside from encroachment*" is assessed at 2. This is partly due to the gymnasium being included resulting in 1% of the sub area being covered by built form. The actual allocated Stratton Road area excludes the gymnasium which may well have improved the Purpose 3 score. It is also noted that the site is semi urban in character. This is not unusual in most sites on the edge of the urban area. However, the critical assessment / judgement made in the GBA2 was whether allocating Sub area 32-o would harm the performance of the wider strategic Green Belt. Arup judged it would not and we contend that the site located as it is on "the edge" between Strategic Areas A and the existing urban areas will continue to play an important role in helping to maintain separation and prevent further urban sprawl. We accept that the southern parts of Local area 32 play a more important role in meeting the Strategic Green Belt objectives but that does not mean that the strategic Green Belt function of sub area 32-o is not important. As can be seen clearly in the detailed assessment sub area 32-o has only been included as a site for potential development as it has been judged to have a "*less important*" rather than "*important*" strategic Green Belt role. Again, it should be noted that sub area 32-o has been assessed by GBA2 as MODERATELY performing Green Belt, NOT weakly performing green belt.

² [Arup Green Belt Assessment Stage 2](#)

³ [Arup Green Belt Assessment Stage 1](#)

It is interesting to note that the assessment of the two adjacent sub areas to 32-o and 32-e to the immediate south and the southern part of 32-a to the west judged that both areas played an important strategic role, but 32-o does not. The northern part of sub area 32-a was judged to have a less important strategic role, similar to 32-o, but by comparison it is a very small enclosed site.

In the area of the Stratton Road site, the Green Belt to the west and south 'washes' across both The Bishop Wand and Hawkedale schools and the gymnasium (all permitted developments in the Green Belt) forming an important part of a strategically important swathe of contiguous Green Belt (Green Belt Strategic area A) from the River Thames in the south along the western edge of Lower Sunbury up to the A308 in the North West . The Stratton Road site forms the northern and eastern urban edge of this Strategic Area and these important edges should not be eroded.

In summary, we believe there is a strong case to be made that the strategic role of the allocated Stratton Road site HS1/012 (most of Sub area 32-o) should have been judged as " important". This would be more consistent with the equivalent judgements made about adjacent areas and reflect the important strategic location of the site at "the edge" between the Strategic Green Belt Area A and the existing urban area.

3. Developability of the Stratton Road Site

Although not directly relevant to the Draft Local Plan consultation, the Council should at least be satisfied that an allocated site can be developed . There are serious concerns about the development potential of the Stratton Road site, principally related to flood protection and access.

Although the site is not within flood zone 3b, as local users will confirm the site and its surrounding areas do flood regularly, probably mainly due to lack of appropriate surface water drainage . A developer would need to undertake a Strategic Flood Risk Assessment and prepare a sustainable drainage system (SUDS). This could well result in the need for a balancing lake on site significantly reducing the developable area.

Access to and from the site to Green Street and Nursery Road can only be achieved down existing narrow residential roads, two of which directly serve schools next to the Stratton road site. A developer would be required to prepare a detailed Traffic Impact Assessment but unless new access roads are envisaged through the Green Belt, it is very hard to see how satisfactory access could safely be achieved. An Environmental Impact Assessment (EIA) would also be required.

4. Use of Outdated Projections to Justify Housing Need

We strongly support Spelthorne Borough Council in challenging the use of outdated 2014-based future household projections, especially since the only way the current target can be achieved is through releasing Green Belt land. If the Government really believe that great importance attaches to Green Belt, then it should reinforce this by accepting that the use of 2014-based data is redundant.