

Revision of Local Plan - Preferred Options Consultation – Notes on Response by LOSRA

The following notes are published to inform our members of our outlined response to the preferred options consultation as it relates to the revision of the Local Plan and is detailed under the three headings:

1. LoSRA Policy on GB
2. The Stratton Road site Assessment (site ID HS1/010)
- 3 Developability of the Site.

1. LoSRA Policy

It is well known that our long-established policy is to oppose development on Green Belt as a matter of principle. However, we have to bear in mind that, as noted, in the Issues and Options consultation the agreed 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”* The problem remains that the moment we concede that it might be OK for any sites which are *‘weakly performing’* when judged against Green Belt criteria to be made available for development, the planning consultants would treat it as the green light to quote such a move as a precedent which undermined any opposition we might express to development on other sites. We also appreciate that residents living near the proposed development sites would rightly expect us to oppose their release for housing, but we will sometimes need to be a bit circumspect about what stance we take.

Although our position is clear, we do understand the reality of the situation and the need for an approved Local Plan to be put in place to control development over the next 15 years. We also accept, as noted by the Council in the earlier Issues and Options report, that *“releasing some weakly performing Green Belt land may be necessary but only where its release would not adversely affect the integrity of the strategic Green Belt”*. This is a very important caveat and it will be picked up later under the Stratton Road site. We are also 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!!

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)

The first three sites were assessed in the Arup Stage 2 Green Belt report (GBA2) as weakly performing against the National Planning Policy Framework (NPPF) criterion as having a less important Green Belt Strategic Role and LoSRA reluctantly accepts that as relatively minor weakly performing sites with a non-strategic Green Belt function that it would be difficult to challenge their allocation.

We contend that the position with the Stratton Road is different and address this below:

2. The Stratton Road Site

You may find it advisable to read the following technical details in conjunction with documents posted on the Council website or published in the recent Council Bulletin.

This site was originally included within Local Area 32 in the Arup Stage 1 Green Belt (GBA1) report. Local Area 32 was assessed against the NPPF criterion as "strongly performing". It also performs an important strategic Green Belt function straddling strategic Green Belt Areas A and B and helping 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 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 boundary of both Strategic Areas A and B, 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.

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 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" or at worst "partly less Important". This would be more consistent with the equivalent judgements made about adjacent areas and reflect the important strategic location of the site bridging Strategic Areas A and B.

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 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.

Our submission to the Council will be available to view on their website in due course.