

Urban Density Analysis of the Spelthorne Draft Local Plan 2020

In considering the local plan put forward by Spelthorne Borough Council and assessing their brownfield site proposals (and the number of housing units that they are suggested to hold), Spelthorne Borough Council (SBC) planners have not always proposed the maximum density possible even with careful reference to surrounding character and appearance.

This, however, is a duty under the National Planning Policy Framework and provides as follows:

“Para.117. Planning policies and decisions should promote an **effective use of land** in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.”

“123. Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, **and ensure that developments make optimal use of the potential of each site.**”

As set out in the table below, more dwellings can be built on available brownfield sites. The values that I have used in this analysis have been achieved by architects in recent developments in London (as recognised in the NPPF good design plays a key role).¹ I have also been conservative with some densities and have reduced densities suggested by the Council in two instances.

Entries in **red** are those brownfield sites which have not been ‘allocated’ by SBC, which I believe should be allocated.

All together this increases the potential number of dwellings on brownfield sites from 2,947 to some 7,505. This does not include any additional brownfield sites that have yet to be discovered.

Para.118 of the NPPF also requires planning policies to

“(c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, **and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;**

d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites

¹ This is also reflected in the NPPF (Chapter 12. Achieving well-designed places). 124. The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure); and

e) support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers.”

In the light of this Guidance, we would also urge SBC to carry out a detailed review of derelict buildings, both commercial and residential, and lock-up garages across the borough to promote and support the development of under-utilised land and buildings in order to ensure the efficient use of brownfield sites in compliance with the NPPF.

Where the number of homes falls below the 15-year projection, SBC should look to use more brownfield sites that could become available in the future rather than seeking to release Green Belt sites with immediate effect.²

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² One such example could be the ICBT, Sunbury, which could accommodate some 5,000 dwellings if a political decision is taken in future to stop extracting fossil fuels.

Site ID	Site	Town	Size (ha)	SBC Plan	dph	MB dph	Green Plan	Notes
AE3/006	158-166 Feltham Road	Ashford	1.30	72	55	200	260	Assumes 3-4 storeys
AS1/003	Staines Fire Station, Town Lane	Stanwell	0.33	30	91	300	99	Assumes 7 storeys
AS2/002	Works adjacent Harrow Road	Ashford	0.58	36	62	150	87	Assumes 3-4 storeys
AS2/003	648 London Road (Garage)	Ashford	0.21	19	90	400	84	Assumes 7 storeys
AT1/001	Hitchcock & King, Stanwell Road	Ashford	1.57	200	127	400	628	Assumes 7 storeys
AT1/010	Harper House, 29-31 Fordbridge Road	Ashford	0.15	15	100	150	23	Assumes 3-4 storeys
AT3/007	Ashford Multi-storey Car Park, Church Road	Ashford	0.20	50	250	0	0	Retain as car park
AT3/009	Ashford Telephone Exchange, Church Road	Ashford	0.27	20	74	200	54	Assumes 3-4 storeys
LS3/005	404-412 Staines Road West (Filling Station & Garage)	Ashford	0.25	18	72	150	38	Assumes 3-4 storeys
RL1/001	Staines ExServicemen Club, 6 Laleham Road	Staines	0.13	10	77	150	20	Ground floor retained use with flats above
RL1/006	43-44 Thames Side	Staines	0.17	10	59	200	34	Assumes 4 storeys
SC1/002	115 Staines Road West	Sunbury	0.11	15	136	200	22	Assumes 3-4 storeys
SC1/003	147 Staines Road West	Sunbury	0.08	15	188	200	16	Assumes 3-4 storeys
SC1/004	Sunbury Fire Station, Staines Road West	Sunbury	0.31	27	87	300	93	Assumes 7 storeys
SC1/005	Sunbury Cross ExServicemen Club, Crossways	Sunbury	0.30	30	100	400	120	Assumes 7 storeys
SC1/012	Sunbury One, Brooklands Close	Sunbury	0.41	0	0	320	131	Assumes 14 storeys
SC1/013	RMG Warehouse & Office, 47-79 Staines Road West	Sunbury	0.25	22	88	400	100	Assumes 7 storeys

SE1/003	Builders Yard, 77 Staines Road East	Sunbury	0.75	45	60	200	150	Assumes 3-4 storeys
SE1/008	Telephone Exchange, Green Street	Sunbury	0.25	14	56	200	50	Assumes 3-4 storeys
SE1/019	Sunbury Social Services Centre, 108 Vicarage Road	Sunbury	0.15	11	73	150	23	Ground floor retained use with flats above
SE1/020	Sunbury Adult Education Centre, The Avenue	Sunbury	0.43	24	56	150	65	Ground floor retained use with flats above
SE1/024	Annandale House, 1 Hanworth Road	Sunbury	0.97	50	52	320	310	Remove commercial; 14 storey blocks
SH1/010	Shepperton Library, High Street	Shepperton	0.14	10	71	150	21	Ground floor retained use with flats above
SH1/015	Shepperton Youth Centre, Laleham Road	Shepperton	0.32	24	75	150	48	Ground floor retained use with flats above
SH2/003	Shepperton Delivery Office, 47 High Street	Shepperton	0.17	20	118	150	26	Ground floor retained use with flats above
SN1/012	Stanwell Beksits, De Havilland Way	Stanwell	2.19	100	46	320	701	Assumes 7 storeys
SN2/001	Minerva House, Minerva Close	Stanwell	0.18	11	61	100	18	Assumes 3 storeys elevated above grade for flood risk
ST1/004	193 London Road	Staines	0.26	26	100	200	52	Assumes 4 storeys
ST1/006	233-269 London Road	Staines	0.88	50	57	320	282	Assumes 7 storeys
ST1/012	Masonic Hall & Old Telephone Exchange, Elmsleigh Road	Staines	0.32	0	0	0	0	Included in ST4/009
ST1/028	Leacroft Centre, Leacroft	Staines	0.16	17	106	150	24	Ground floor retained use with flats above

ST1/029	Surrey CC Building, Burges Way	Staines	0.47	30	64	150	71	Ground floor retained use with flats above
ST1/030	Fairways Day Centre, Knowle Green	Staines	0.63	30	48	150	95	Ground floor retained use with flats above
ST1/031	Thameside Arts Centre, Wyatt Road	Staines	0.25	19	76	150	38	Ground floor retained use with flats above
ST1/036	Universal Tyres, Laleham Road	Staines	0.08	12	150	200	16	Assumes 4 storeys
ST1/037	Thameside House, South Street	Staines	0.24	120	500	320	77	Assumes 14 storeys
ST2/005	Friendship House, 49-51 Gresham Road	Staines	0.13	10	77	200	26	Assumes 4 storeys
ST2/006	Builders Yard, Gresham Road	Staines	1.37	100	73	200	274	Assumes 3-4 storeys
ST2/008	Staines Tinware, Langley Road	Staines	0.34	18	53	100	34	Assumes 3 storeys elevated above grade for flood risk
ST3/003	Land off Pulman Place	Staines	0.22	14	64	64	14	Assumes 4 storeys; permission granted on appeal 2006 but lapsed
ST3/004	Oast House & Car Park, 34-36 Kingston Road	Staines	0.93	180	194	400	372	Assumes 7 storeys
ST3/008	Burma House, Station Path	Staines	0.14	14	100	200	28	Assumes 4 storeys
ST3/012	Staines Telephone Exchange, Fairfield Avenue	Staines	0.60	165	275	320	192	Ground floor retained use with flats above
ST4/001	Builders Yard, Moor Lane	Staines	0.59	36	61	200	118	Assumes 3-4 storeys
ST4/002	Sea Cadet Bldg, Hanover House & Car Park, Bridge St.	Staines	0.90	75	83	320	288	Assumes 14 storeys
ST4/004	96-104 Church Street	Staines	0.89	55	62	200	178	Assumes 3-4 storeys
ST4/009	Elmsleigh Centre, South Street	Staines	6.34	650	103	275	1,744	Assumes 14 storeys, lower 2 storeys retail

ST4/010	Riverside Car Park, Thames Street	Staines	0.25	100	400	400	100	Assumes 7 storeys
ST4/011	Thames Lodge, Thames Street	Staines	0.36	65	181	400	144	Assumes 7 storeys
ST4/018	Old Town Hall, Market Square	Staines	0.10	13	130	140	14	Application 17/01143/FUL granted for 13 dwellings, after 13/00835/FUL granted on appeal for 14 dwellings
ST4/019	Debenhams site, 35-45 High Street	Staines	0.27	250	926	400	108	Assumes 7 storeys
				2,947				7,505