

Spelthorne Borough Council
Draft Retail and Other Town Centre Uses Study
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Whole	Kempton Residents Association	<p>Further to your recent email, please note our comments as follows.</p> <p>Our prime concern, of course, is for a new and bigger Health Centre in Sunbury, and we very much hope this will feature prominently on your list of priorities and be given the urgent attention it warrants.</p> <p>With regard to future 'retail needs', as far as those of the shopkeepers are concerned, these will obviously include a desire for greater custom. In this context, there are a considerable number of elderly people who are unable to stand for long periods at bus stops, but would wish to shop more frequently if they could. Unfortunately, there is at present a lamentable dearth of bus shelters and/or benches throughout the Borough. Indeed, the Council compares very badly with surrounding boroughs in the provision of these facilities.</p> <p>Please, therefore, we would like you to show more consideration for this sizeable and more vulnerable section of the community by enabling the elderly to visit their shopping centres more easily.</p>	<p>The provision and need for health centres, benches and bus shelters across the borough is not part of the project brief. However the point is noted and these issues are likely to be considered through separate evidence base studies.</p>	<p>No change.</p>
Whole	Staines Town Society	<p>Thank you for the opportunity to comment on the draft Retail study. We have read it carefully but</p>	<p>The retail need identified is broadly consistent with the scale of town</p>	<p>Add recognition that an update to the study may be</p>

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		<p>cannot agree with its conclusion that a massive increase in retail floorspace will still be needed in the new Plan period. The optimistic prediction that the increase in online shopping will level off, leading to a resurgence of high street shopping, is not sufficiently justified.</p> <p>In particular, the claim in 4.23 that Staines centre has had a consistent vacancy rate through the recession and thus 'demonstrates strong performance and resilience' fails to take account of the loss of about 10 shop premises when the Majestic House site was demolished in 2008. If demand had been constant the rest of Staines High Street and centre would have been full after these shops were demolished; in fact it has continued to have many vacancies, showing that net demand has significantly reduced. This undermines the whole argument that Staines will support a large retail expansion.</p> <p>We note that table 8.1 in para 8.15 predicts an 18% rise in population in Spelthorne over the years 2014-2034. There is insufficient detail on the evidence behind this remarkable claim. It appears to be impossible within the restraints on housing land in the existing Local Plan, and could only come about if a new Plan allowed a big increase in housing, by releasing Green Belt land or permitting a proliferation of high-rise flats. But this document is part of the evidence base for the new Plan. It cannot be based on assumptions</p>	<p>centre sites identified. The delivery of this amount of floorspace could take place with the 'town centres first' policy framework, and no surplus need has been stated which would lead to a need to identify less central development sites.</p> <p>The population projections are based on long term trends, and – in retail forecasting terms – there is no evidence to suggest that this figure should not be used.</p> <p>Further, the retail catchment of Spelthorne extends beyond the borough boundary. Whilst it is recognised that not all population growth attributed to come from net migration will arise from the retail catchment there will still be an element of floorspace demand from areas outside of Spelthorne, some of which may deliver housing on a scale to meet their own or others housing needs</p> <p>Therefore, even if housing targets in Spelthorne constrained the population growth in the Spelthorne Core Areas, the population in parts of the retail catchment outside</p>	<p>required at a later date.</p>

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		<p>about the content of the Plan.</p> <p>The ONS projection of 18% population growth assumes 6% natural increase and 12% net inward migration, mostly from the London area. It is only a prediction, to be treated with caution, and should not be allowed to become a self-fulfilling prophecy: they say 18%, you revise the Local Plan to allocate more space for housing, the houses are built and so the people come here. The duty on the local authority is to meet its housing needs, i.e. the 6% growth, and the duty to co-operate is stated to be with Runnymede, not with London.</p> <p>This issue is fundamental to the new Local Plan, and belongs in your housing study, which surely has to be completed before the retail study. Then the evidence from the housing document of likely population figures will provide data for retail predictions. But we are not aware of any recent consultation on a housing evidence document.</p> <p>Finally we commend the comment in 9.33 about the importance of visual linkages and the adverse effects of large scale dense river frontage development, cutting the river off from the town centre. This applies to the Bridge Street car park site.</p>	<p>Spelthorne may well continue to grow and give rise to floorspace demand within Spelthorne (primarily Staines Town Centre) i.e. even if migration does not occur, population increases in areas outside Spelthorne will still lead to retail floorspace demand. Some population growth will also occur as concealed households and may not be constrained by housing targets in any event.</p> <p>Further, other local authority retail studies estimate floorspace based on unconstrained demographic projections. If other authorities continue with this methodology and Spelthorne does not, there is a danger of neighbouring town centres delivering retail floorspace which claws trade away from Staines Town Centre.</p> <p>It is therefore proposed to publish the final retail study based on the demographic projections with a recognition that an update may be required at a later date.</p>	
Whole	Mr Alan Doyle	Executive Summary	The retail need identified is broadly	Add recognition that an

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	Keep Kempton Green	<p>We welcome this opportunity to submit our comments on the Spelthorne Draft Retail and Other Town Centre Uses Study.</p> <p>In summary:</p> <ul style="list-style-type: none"> * The Draft Study assumes a rate of population growth in Spelthorne over the next twenty years of 18%. It accepts this projection without question or enquiry as to its suitability to this Borough. * Around two-thirds of this projected population growth is made up of net migrants into Spelthorne, overwhelmingly from other parts of England, and mainly from London Boroughs. * This not an external factor over which Spelthorne Council has no control. Such a large assumed rate of growth should therefore be treated with the utmost caution, particularly as this Borough moves ever closer to full capacity. * Emphasis should be placed on providing first for the local natural increase in population and locally-based changes in population structure, rather than facilitating further net inward migration. * Central government guidance allows for these high level population projections to be adjusted to suit local conditions, providing this can be 	<p>consistent with the scale of town centre sites identified. The delivery of this amount of floorspace could take place with the ‘town centres first’ policy framework, and no surplus need has been stated which would lead to a need to identify less central development sites.</p> <p>The population projections are based on long term trends, and – in retail forecasting terms – there is no evidence to suggest that this figure should not be used.</p> <p>Further, the retail catchment of Spelthorne extends beyond the borough boundary. Whilst it is recognised that not all population growth attributed to come from net migration will arise from the retail catchment there will still be an element of floorspace demand from areas outside of Spelthorne, some of which may deliver housing on a scale to meet their own or others housing needs</p> <p>Therefore, even if housing targets in Spelthorne constrained the population growth in the Spelthorne Core Areas, the population in parts</p>	<p>update to the study may be required at a later date.</p>

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		<p>justified on the basis of robust evidence. Further detailed work on population growth and housing need should be completed before accepting the conclusions of this Study.</p> <p>These summary points are discussed in detail in what follows.</p> <p>1. Population growth assumptions</p> <p>1.1 There is much of interest in the Study.</p> <p>However, on page 66 of Volume 1, the following Table 8.1 summarises the population growth assumptions underlying the Study.</p> <p>The third and fourth columns are demographic projections published by the Department of Communities and Local Government (DCLG). These DCLG projections are the same (rounded to the nearest 100) as the population projections published regularly by the Office for National Statistics (ONS).</p> <p>1.2 "The projections are trend-based, making assumptions about future fertility, mortality and migration levels based on trends in recent estimates, usually over a five-year reference period. They give an indication of what the future population size and age and sex structure might be if recent trends continued. They are not forecasts and take no account of policy nor</p>	<p>of the retail catchment outside Spelthorne may well continue to grow and give rise to floorspace demand within Spelthorne (primarily Staines Town Centre) i.e. even if migration does not occur, population increases in areas outside Spelthorne will still lead to retail floorspace demand. Some population growth will also occur as concealed households and may not be constrained by housing targets in any event.</p> <p>Further, other local authority retail studies estimate floorspace based on unconstrained demographic projections. If other authorities continue with this methodology and Spelthorne does not, there is a danger of neighbouring town centres delivering retail floorspace which claws trade away from Staines Town Centre.</p> <p>It is therefore proposed to publish the final retail study based on the demographic projections with a recognition that an update may be required at a later date.</p>	

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		<p>development aims that have not yet had an impact on observed trends."1 (Our emphasis in bold).</p> <p>i.e. the title of Table 8.1 is misleading. The figures are not "Forecasts", but projections which "take no account of policy or development aims that have not yet had an impact on observed trends". In this context, these policy and development aims include local policy and development aims.</p> <p>1.3 The table immediately below is an analysis of the components of demographic change which together make up the population growth projections in columns three and four of Table 8.1.2 (The total differs from that in Table 8.1 due to the rounding difference.)</p> <p>Spelthorne - Components of population growth Total 2014 - 2034</p> <p>Internal migration in persons All ages 111,290 Internal migration out persons All ages 101,157 Internal migration net persons All ages 10,133</p> <p>Cross border migration in persons All ages 2,111 Cross border migration out persons All ages 3,170</p>		

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		<p>Cross border migration net persons All ages -1,059</p> <p>Net intra-UK migration persons All ages 9,075</p> <p>International migration in persons All ages 9,688</p> <p>International migration out persons All ages 7,381</p> <p>International migration net persons All ages 2,307</p> <p>Total migration net persons All ages 11,382</p> <p>Births by age of mother persons All ages 24,198</p> <p>Deaths persons All ages 17,874</p> <p>Natural change - net persons All ages 6,325</p> <p>Population change total persons All ages 17,707</p> <p>Migration as % of total population change 64.3%</p> <p>o/w intra-uk as % contribution to total population change 51.2%</p> <p>o/w international as % contribution to total population change 13.0%</p> <p>Natural change as % of total population change</p>		

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		<p>35.7%</p> <p>1.4 In the table above:</p> <p>a. "Internal migration" is migration to and from other areas in England.</p> <p>b. "Cross border migration" in migration to and from Scotland, Wales and Northern Ireland</p> <p>c. "International migration" is migration to and from non-UK countries.</p> <p>As is clear, 10,133 people of the total projected population growth in Spelthorne of 17,707 (some 57%) are assumed to come from net inward migration from other parts of England.</p> <p>As might be expected, almost 60% of the internal migrants into Spelthorne come from London Boroughs.³</p> <p>Together with a small assumed outflow to other parts of the UK of 1,059 people, and a relatively minor net inflow of 2,307 people from the rest of the world, total migration into Spelthorne is assumed to be almost two-thirds of the total increase in population, with unchanged policy and development aims. Just over one-third is attributable to the natural growth in Spelthorne's population.</p> <p>Put another way, if there was no net migration into Spelthorne, the projected increase in the</p>		

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		<p>population (i.e. the "natural increase") over the period from 2014 to 2034 would be 6.4%, not 18.0%.</p> <p>1.5 The projected net inward migration, which forms such a large part of the projected total population growth, is based on the trend over the previous five year period. As the chart above clearly shows, projections calculated on this trend basis a few years ago would have given a completely different result, as the five-year trend would have excluded the recent migration into this Borough. The point is that there is nothing sacrosanct about the projections: who knows whether the most recent net inward migration might reverse - as it has in the not so distant past - radically changing the projections yet again.</p> <p>Net migration into Spelthorne is only possible to the extent that there is sufficient housing for migrants to move into. It is not an external factor over which a local authority - specifically, Spelthorne - has no control.</p> <p>This is not in any way meant to cast any negative aspersions on people who come to live in this Borough. But as Spelthorne moves ever closer to full capacity (the infrastructural constraints are well known and need no repeating here) a difficult decision needs to be taken.</p>		

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		<p>Given Spelthorne's limited capacity to absorb further increases in population (without building on Green Belt and other open spaces, and/or sharply increasing population density in the current built-up areas) a political and planning choice will have to be made as to which population group gets priority: inward migrants, or those with an existing link to this Borough, as represented by the "natural" rate of population growth.</p> <p>These top-down projections of population growth have been included in the Study without detailed examination. Care should be taken that any component part of the Local Plan does not allow for further unsustainable migration into the Borough simply on the basis that it has happened in the recent past.</p> <p>2. Planning Practice Guidance 2.1 The Planning Practice Guidance (PPG) issued by the DCLG, in its section on the methodology to use when assessing economic development and main town centre uses, says the following:</p> <p>"Labour supply models are based on population and economic activity projections. Underlying population projections can be purely demographic or tied to future housing stock which needs to be assessed separately. These models normally make predictions for a period of 10 to 15 years. Plan makers should be careful to consider that</p>		

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		<p>national economic trends may not automatically translate to particular areas with a distinct employment base."4</p> <p>In the closely associated topic of Housing Needs Assessments, the PPG says the following:</p> <p>"The household projections are trend based, i.e. they provide the household levels and structures that would result if the assumptions based on previous demographic trends in the population and rates of household formation were to be realised in practice. They do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour."</p> <p>The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends."5</p> <p>2.2 The population growth projections published by the ONS, and the DCLG data based upon them, are therefore not fixed in stone. They can be adjusted at a local level to reflect local conditions and circumstances. The proviso is that: "Any local changes would need to be clearly explained and justified on the basis of established sources of robust evidence."6</p>		

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		<p>3. Conclusion</p> <p>3.1 The assumed population growth rate underlying the Study is too high. It comprises a very large component of inward migration into Spelthorne, based on recent trends in migration, which has been included in the Study without question as to its applicability.</p> <p>3.2 Central government guidance allows for these population projections to be adjusted to suit local conditions, providing this can be justified on the basis of robust evidence.</p> <p>3.3 Spelthorne is fast approaching full capacity. The assumed population growth rate underlying this Study should therefore be treated with the utmost caution, until further detailed work on population growth and housing needs has been completed.</p>		
Whole	Mr C Squire	<p>Thank you for your letter dated 13 March 2015 and for giving us the opportunity to comment on the above report.</p> <p>Background</p> <p>We are a family owned business incorporated in 1936 and we operate fifteen garden centres all located in Middlesex, Surrey, Sussex and Berkshire. We employ in the region of 630 people in the company as a whole throughout the year</p>		

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		<p>rising to just over 700 during the spring season. Our garden centre in Spelthorne is located in Halliford Road, Shepperton. We purchased the site over 40 years ago in 1975 and have run a garden centre on the site ever since. We completely rebuilt the garden centre in 2011 which represented a very major investment (in excess of £4 million) in the borough on the part of our company. We currently employ 65 people in our garden centre at Shepperton, in a mix of full time and part time roles. The vast majority of our staff are employed on permanent contracts. Our small cohort of seasonal staff are employed on fixed term contracts. None of our staff are employed on zero hour contracts.</p> <p>Representations</p> <p>As a company (and personally as an individual who lives in the Borough) we understand the need to safeguard and promote the town centres within Spelthorne, namely Staines, Shepperton, Ashford and Sunbury Cross. Vibrant town centres with an interesting and diverse retail offering and leisure activities are very important to local people. We also appreciate the need to protect our countryside and the gaps between the settlements in the Borough. We agree that the last twenty years or so have seen growth in the number of out of town supermarkets and DIY stores. Interestingly a number of supermarkets have recently decided against developing further</p>		

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		<p>large out of town stores and even cancelled the opening of some that have already been built. It seems that more people are now choosing to shop at smaller in town or local stores. Only last week a major DIY chain announced the closure of a number of its' stores too. Therefore the trend towards out of town development may be going into reverse and there may be fewer planning applications for such stores going forward.</p> <p>Having said that; there are some specialist retail businesses which are not easily located in town centres but which are none the less desirable in the Spelthorne. Future planning policies should take account of these. Garden centres are not the sole example of such businesses but are a case in point because plants and gardening products cannot be successfully looked after and sold, in a significant way, in shopping centres. If the consumer is to be offered a good choice of high quality outdoor plants these plants need to be retailed from reasonably sized outside areas or under canopies, depending on plant type, plus adequate shop space and car parking.</p> <p>Hand in hand with this we believe it is important for local authorities to encourage investment in local employment sites so that we, and local and regional businesses like ours, can offer good prospects and stable employment to local people, thus reducing commuting distances and improving work/life balance. Approximately 85%</p>		

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		<p>of the plants we sell are British grown, some on our own premises and the vast majority come from local nurseries within the counties of Surrey, Sussex and Hampshire thus contributing further to the local and regional economy.</p> <p>In addition the provision of attractive, up to date facilities for local people to shop is very important in a vibrant local economy. Encouraging spending to stay local has to be a good thing for the local community, local employment and road transport policies. Garden centres are increasingly becoming a place to meet for local people. They are a place where young families and retired people can feel equally at home. With advice on hand and workshops for all ages, we are in a privileged position; helping people to enjoy gardening, to enjoy being outside in the fresh air and lead a less sedentary lifestyle. Gardening has great physical and mental health benefits. It is also an important way to introduce children to topics such as 'where food comes from', 'healthy eating' and 'living an active lifestyle'. Garden centres promote wildlife friendly plants and products and encourage people to make their gardens and the borough as a whole (for example through Spelthorne in Bloom) a greener and more pleasant place.</p> <p>There is a demand for garden centres in the area and if this is not met in Spelthorne then people will drive to neighbouring boroughs and to larger</p>		

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		<p>garden centres situated there so the work and the customers will travel elsewhere.</p> <p>Along with other businesses we face ever increasing competition, from other garden centres, from the DIY stores, from the supermarkets (many now sell a limited but carefully chosen range of best -selling plant lines and gardening products) and the internet. Also customers expect ever improving retail standards.</p> <p>Therefore we envisage that over the coming years we will need to further invest in all our sites, including Shepperton. As with any business, if we cease to re-invest and endeavour to improve every aspect of our business (from the plants and products we sell to the buildings we operate from) then we will go backwards not forwards. Reinvestment and improvement is an essential in today's business climate.</p> <p>Therefore we ask that the horticultural retail sector should not be forgotten in the process of planning for the retail needs of the Borough in the medium and long term. Indeed garden centres should be seen as a desirable and useful part of the retail offering in Spelthorne, all be it one with specific requirements which means that it does not fit neatly into the model of high street retailing.</p> <p>We may wish to make further or additional representations in due course.</p>	<p>Garden centres have specific characteristics and a widely defined range of goods, which can overlap with a local town centre offer.</p> <p>The retail study specifically considers the need and demand for additional retail floorspace in a town centre first capacity which is in line with the National Planning Policy Framework (NPPF).</p>	<p>Add recognition that horticultural/garden centre retailing could be looked at if found to be a significant contributor to overall retailing in the borough.</p>

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			<p>Out of centre proposals for retail/town centre floorspace will need to be considered on a case by case basis, and tested against the national and local policy context. Each should be considered on their own merits.</p> <p>However, if horticultural/garden centre retailing forms a significant part of overall retailing in Spelthorne then this could be looked at in an update study.</p>	
Whole	Mr Stuart Watkins	Would be good to see provision for some public showers in Staines town centre to encourage commuting by bicycle.	The Council could consider this on a case by case basis as part of the planning application process.	No change.