

Spelthorne Borough Council

Functional Economic Area

Analysis

Draft Report

Table of Comments and Council Response

March 2017



Introduction

Spelthorne Borough Council consulted on the Draft Functional Economic Area Analysis Report from 10th October 2016 to 7th November 2016. The comments received are set out in the following table, with a summary of each representation and the Council's response.

Table of Comments and Officer Responses - Functional Economic Area Analysis

| Comment Ref No | Verbatim Comment | Summarised Comment | SBC Response |
|----------------|---|--|--|
| 00043/6/001 | <p>Historic England</p> <p>I am writing to confirm that at this stage Historic England has no comments to make on the Functional Economic Area Analysis Draft Report.</p> | <p>1. Historic England</p> <p>I am writing to confirm that at this stage Historic England has no comments to make on the Functional Economic Area Analysis Draft Report.</p> | <p>Noted.</p> <p>No changes to be made.</p> |
| 00019/6/001 | <p>London Borough of Richmond Upon Thames</p> <p>The report seeks to define the Functional Economic Area (FEA) for Spelthorne. The draft report concludes that Spelthorne sits within a Heathrow-focussed FEA, and holds its strongest links with Runnymede, Hounslow, Hillingdon and Elmbridge.</p> <p>It also suggests a stronger relationship towards London from Spelthorne (and Runnymede) than to other parts of Surrey. The main relationship with LB Richmond is through commuting flows. Analysing commuting data from the 2011 Census, it was found that the number of working residents commuting to Greater London from Spelthorne was around (44%), highlighting strong commuter links between Spelthorne and London. The strongest of these links are to West London, particularly to the London Boroughs of Hillingdon (4,219), Hounslow (5,579) and Richmond upon Thames (2,111). We note, though the strongest labour market links are with London Boroughs of Hillingdon and Hounslow and Runnymede, the functional labour market will extend into other authority areas such as Elmbridge, Richmond-upon-Thames, Slough and Windsor & Maidenhead, although not as strongly.</p> <p>The report states that it has been produced in line with national policy and planning guidance, which requires local authorities to have a good understanding of the wider economic area of which they are a part so that they can clearly identify which neighbouring authorities they need to work with under the Duty to Cooperate.</p> | <p>2. London Borough of Richmond Upon Thames</p> <p>The main relationship with LB Richmond is through commuting flows. We note that the strongest labour market links are with London Boroughs of Hillingdon and Hounslow and Runnymede though the functional labour market will extend into other authority areas.</p> <p>The report states that it has been produced in line with national policy and guidance which requires authorities to have a good understanding of the wider economic area of which they are a part so that they can clearly identify which neighbouring authorities they need to work with under the Duty to Cooperate.</p> | <p>Noted. The FEA is derived from a range of factors of which commuting patterns is just one. It is accepted in the report that links exist with Richmond but they are not as strong overall as with the FEA that has been defined.</p> <p>No changes to be made.</p> |
| 01696/4/001 | <p>Environment Agency</p> | <p>3. Environment Agency</p> | <p>Noted.</p> |

| Comment Ref No | Verbatim Comment | Summarised Comment | SBC Response |
|----------------|--|---|--|
| | We have no comments to make on the Green Belt Assessment Draft Methodology and Spelthorne Functional Economic Area Analysis Draft Report. | We have no comments to make on the Spelthorne Functional Economic Area Analysis Draft Report. | No changes to be made. |
| 00029/1/001 | <p>Mole Valley District Council</p> <p>Officer level response:</p> <p>Thank you for emailing MVDC regarding the above consultation. We have no comments to make although would draw to our previous response to Spelthorne's FEA consultation dated 17th March 2016.</p> | <p>4. Mole Valley District Council</p> <p>Officer level response:</p> <p>Thank you for emailing MVDC regarding the above consultation. We have no comments to make although would draw to our previous response to Spelthorne's FEA consultation dated 17th March 2016.</p> | <p>Comments made under the previous Duty to Cooperate consultation noted regarding the weak degree of functional economic linkage between Spelthorne and Mole Valley.</p> <p>No changes to be made.</p> |
| 01805/1/001 | <p>Highways England</p> <p>Thank you for your correspondence of the 10th of October inviting Highways England to comment on your Local Plan Review Evidence Base Documents which include:</p> <ul style="list-style-type: none"> • Green Belt Assessment - Draft Methodology • Sustainability Appraisal/Strategic Environmental Assessment Draft Scoping Report and, • Spelthorne Functional Economic Area Analysis Draft Report. <p>In addition, thank you for inviting Highways England to identify and offer potential housing and economic development sites for inclusion in the SLAA.</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>Our interest in such Strategy documents is specifically focussed on the council's approach to highway and transport matters in relation to regeneration and new development. We are keen to understand how local authorities initially identify and prioritise</p> | <p>5. Highways England</p> <p>5.1 Focus on the council's approach to highway and transport matters in relation to regeneration and new development.</p> <p>5.2 Keen to understand how local authorities initially identify and prioritise transport improvements in order to deliver sustainable development</p> <p>5.3 Interest in how local authorities set and implement policy to manage trip demands and how these may affect safe and efficient operation of the SRN</p> <p>5.4 Note that the council intend to take an active approach to sustainable public transport. This approach is preferred to the building of new infrastructure</p> <p>5.5 It was interesting to note that a substantial proportion of the boroughs working populous commute out for work and are clearly drawn to neighbouring London Boroughs of Hillingdon and Hounslow due to the employment linked with Heathrow.</p> <p>5.6 It is considered appropriate that the council desires to strengthen public transport links between the Borough and Heathrow</p> <p>5.7 Even with heavy emphasis on public transport initiatives there is still the potential for residual adverse impacts on the highway</p> | <p>No comments made in relation to the proposed FEA.</p> <p>No changes to be made.</p> |

| Comment Ref No | Verbatim Comment | Summarised Comment | SBC Response |
|----------------|---|---|--------------|
| | <p>transport improvements in order to deliver sustainable development. Specifically how local authorities set and implement policy to manage trip demands and ultimately how these might affect the safe and efficient operation of the Strategic Road Network for which we are responsible. Highways England will be concerned that the cumulative effect of development proposals have the potential to impact on the safe and efficient operation of the SRN, in this case the M25 J13 and 14, M3 J1, the A30, A316 and the A31 13 all of which are either adjacent to or within the councils boundary.</p> <p>It is noted and welcomed that the council are intending to take an active approach to sustainable public transport to better manage demand on the highway network for the movement of people and goods. This approach is preferred against the initial building of new infrastructure which should be viewed as a final resort. It was interesting to note that a substantial proportion of the boroughs working populous commute out for work and are clearly drawn to neighbouring London Boroughs of Hillingdon and Hounslow due to the employment linked with Heathrow. The councils desire to strengthen the public transport links between itself and Heathrow is appropriate as this is likely to reduce the dependence on car travel which is currently the Boroughs primary means of transport with overall car ownership likely to remain high. Strengthening public transport links between Heathrow and Spelthorne could become essential should a third runway at Heathrow proceed which at present seems likely.</p> <p>The council's aspiration of creating more employment for its residents is appropriate and this should provide beneficial effects on the public highway by reducing the amount of commuting in and out of the Borough, this shift however will likely be gradual over a longer period of time. Locating housing within easy reach of public transport or adjacent employment sites should again be beneficial to the highway network particularly if walking and cycling improvements are also delivered as part of the development packages. As car ownership is unlikely to reduce over the period of the Local Plan it is essential that sustainable public transport is developed and promoted as far as is practicable to provide commuters with a viable alternative means of daily transport.</p> | <p>network. The council therefore needs to provide evidence that its proposals have no residual severe impacts on the operation of the SRN.</p> | |

| Comment Ref No | Verbatim Comment | Summarised Comment | SBC Response |
|----------------|--|--|--|
| | <p>However, even with a heavy emphasis on public transport initiatives there is still the potential for residual adverse impacts on the highway network. Therefore, the council will need to provide sufficient evidence to demonstrate that its proposals have no residual severe impacts on the operation of the SRN or provide highway proposals to mitigate such impacts to an acceptable level.</p> <p>Finally, in relation to your call for sites Highways England have not identified any potential housing and economic development sites for inclusion in the SLAA at this time.</p> | | |
| 00031/2/001 | <p>Tandridge District Council</p> <p>Firstly, Tandridge District Council (TDC) acknowledges and welcomes the opportunity to have effective and ongoing dialogue under the duty to cooperate with Spelthorne Borough Council.</p> <p>TDC prepared a Duty to Cooperate Scoping Statement 2014, and a Duty to Cooperate Statement Update 2015 that sat alongside the TDC Regulation 18 Local Plan that was published for consultation between 18 December 2015 and 26 February 2016. A further iteration of the DtC Statement Update has been prepared to accompany the Local Plan: Sites Consultation which commenced public consultation on 4th November 2016.</p> <p>TDC's scoping statement provides a good foundation to direct and discuss strategic matters with the relevant bodies. As TDC continue to prepare their Local Plan, the Duty to Cooperate statement will be updated to reflect how things have progressed. It is intended that this will be done at each regulation stage to reflect the discussions had and mechanisms put in place through each regulation stage.</p> <p>In our Duty to Cooperate Scoping Statement 2014, we identified that the only strategic issues between Tandridge and Spelthorne are housing and traveller needs.</p> <p>It is acknowledged that Spelthorne and Tandridge sit at opposite sides of the county; we are still committed to ensuring that further consultation takes place under the Duty to Cooperate and we will</p> | <p>6. Tandridge District Council</p> <p>6.1 In our Duty to Cooperate Scoping Statement 2014, we identified that the only strategic issues between Tandridge and Spelthorne are housing and traveller needs.</p> <p>6.2 It is acknowledged that Spelthorne and Tandridge sit at opposite sides of the county; we are still committed to ensuring further consultation takes place under the Duty to Cooperate. Emerging evidence gathering for our Local Plan is demonstrating that meeting our full OAN will be challenging. Should any opportunity assist us in doing so, we would very much welcome this and be happy to discuss.</p> <p>6.3 TDC have also prepared a Functional Economic Area topic paper and agree that the two districts are not fundamentally linked as to form part of the same FEA.</p> | <p>No specific comments on the FEA.</p> <p>No changes to be made.</p> |

| Comment Ref No | Verbatim Comment | Summarised Comment | SBC Response |
|----------------|---|--|--|
| | <p>be willing to attend any meetings in the future as necessary. Emerging evidence gathering for our Local Plan is demonstrating that meeting our full OAN will be challenging. Whilst we are taking every necessary step to try and meet our needs, should any opportunity to assist us in doing so, arise, we would very much welcome this and be happy to discuss.</p> <p>Functional Economic Area</p> <p>TDC have also prepared a Functional Economic Area topic paper and agree that the two districts are not fundamentally linked as to form part of the same FEA.</p> | | |
| 01825/3/001 | <p>Redrow Homes</p> <p>The Functional Economic Area (FEA) Analysis finds that Spelthorne sits within a Heathrow focused FEA and shares its strongest links with Runnymede and the London Boroughs of Hillingdon and Hounslow. It is therefore considered that these four 'core' authorities constitute the Functional Economic Market Area that Spelthorne sits within.</p> <p>This has been informed by a number of key geographic links that were identified in the analysis:</p> <ul style="list-style-type: none"> o Spelthorne is within the North West Surrey Housing Market Area o Spelthorne is identified as being within the Heathrow-Slough-High Wycombe Property Market Area o Spelthorne is located within the Slough and Heathrow Travel to Work Area o Staines-upon-Thames is classified as a secondary regional retail centre o Other FEAs suggest that Spelthorne has strongest functional economic ties with Runnymede, Hounslow and Hillingdon <p>The FEA Analysis finds that the strongest overall linkages are present between Spelthorne and Runnymede, followed by Elmbridge and the London Borough of Hounslow. A notable link is also held between Spelthorne and Hillingdon. Woking and the London Borough of Richmond-upon-Thames influence the FEA to a much lesser extent. The analysis notes that the strongest</p> | <p>7. Redrow Homes</p> <p>7.1 Whilst the FEA analysis strongly emphasises the importance of close working between the four 'core' authorities on the strategic planning of the functional economic area, there are a number of significant concerns with the relationships to date.</p> <p>7.2 It is understood that Runnymede has asked Spelthorne, under the duty to cooperate, to consider if they can meet their unmet industrial need. However Spelthorne BC has raised significant reservations about the robustness and adequacy of some of the work that underpins the local plan and the conclusions that it reaches. Spelthorne has highlighted that Runnymede's request for it to accommodate industrial uses is premature and that further work is required.</p> <p>7.3 Whilst important issues are being identified in the emerging evidence base documents and local plan, there is no joint consideration between Spelthorne and Runnymede as to how they are addressed in the context of strategic planning. This is failing to meet the requirements under the duty to cooperate, which will undermine the legal compliance of the emerging local plan. There is a clear</p> | <p>No specific comments on the FEA. Spelthorne engages regularly with all surrounding authorities on strategic issues under the requirements of the Duty to Cooperate and will continue to do so.</p> <p>Spelthorne Borough Council is at an early stage of its Local Plan review and does not yet have sufficient evidence to state whether it can meet its own need or the need of other authorities. The Council will engage with neighbouring authorities once appropriate to consider meeting need.</p> <p>Joint working under the Duty to Cooperate is ongoing with regards to Heathrow Airport through the Heathrow Strategic Planning Group and at local authority level.</p> <p>No changes to be made.</p> |

| Comment Ref No | Verbatim Comment | Summarised Comment | SBC Response |
|----------------|--|---|--------------|
| | <p>ties are with those areas that are immediately adjacent to its boundaries, including the employment areas of Heathrow Airport in Hillingdon and the Poyle and Colnbrook trading estates in Slough, in addition to the key settlements that surround the Borough of Spelthorne.</p> <p>Importantly, the report highlights that the demand/supply of economic development and the balance of jobs/housing should be collectively considered by a number of local authorities under the statutory duty to cooperate based on the housing and functional economic market areas identified. However, whilst the FEA Analysis strongly emphasises the importance of close working between the four 'core' authorities on the strategic planning of the functional economic area it is evident that there are a number of significant concerns with the relationships to date.</p> <p>Runnymede Borough Council has found that their preferred spatial strategy for accommodating the borough's growth needs, Option SS3, as set out in the Local Plan Issues Options and Preferred Approaches (IOPA) (July 2016), would result in a surplus of up to 58,000sqm of office floorspace but a deficit of up to 87,000sqm industrial floorspace, specifically for storage and distribution uses. They highlight that it would be unlikely that they can meet their employment needs for storage and distribution uses given the reported lack of developer interest and low rental values when compared to other land uses. However, the surplus of office floorspace in Runnymede could be used to help other areas in the FEA meet their office floorspace needs, with other areas in the FEA providing some of Runnymede's unmet storage & distribution needs. This would require agreement under the duty to cooperate.</p> <p>It is understood that Runnymede has asked Spelthorne, under the duty to cooperate, to consider if they can meet their unmet need for storage and distribution uses, as well as residential, and gypsy and travellers pitches. However, in its response to consultation on the local plan, Spelthorne Borough Council has raised significant reservations about the robustness and adequacy of some of the work that underpins the local plan and the conclusions that it reaches. Spelthorne has highlighted that</p> | <p>need for closer working between the four 'core' authorities on the demand/supply of economic development and the balance of jobs/housing that should be provided as each borough progresses their local plan.</p> <p>7.4 Given Spelthorne's strong links with Heathrow, the potential impact of a third runway will have to be considered in the wider sub-region through the Duty to Cooperate.</p> | |

| Comment Ref No | Verbatim Comment | Summarised Comment | SBC Response |
|----------------|--|--|--|
| | <p>Runnymede's request for it to accommodate storage and distribution uses is premature and that further work is required.</p> <p>Whilst important issues are being identified in the emerging evidence base documents and local plan, there is no joint consideration between Spelthorne and Runnymede as to how they are addressed in the context of strategic planning. This is failing to meet the requirements under the duty to cooperate, which will undermine the legal compliance of the emerging local plan. There is a clear need for closer working between the four 'core' authorities on the demand/supply of economic development and the balance of jobs/housing that should be provided as each borough progresses their local plan.</p> <p>Adding runway capacity at Heathrow is forecast to create up to 77,000 additional local jobs over the next 14 years and generate a need for up to 70,800 additional homes to accommodate the new workers. Given Spelthorne's strong economic links with Heathrow, the impact of the third runway in Spelthorne and the wider sub-region will also need to be carefully considered through the duty to cooperate.</p> | | |
| 00025/5/001 | <p>Runnymede Borough Council</p> <p>Thank you for consulting Runnymede Borough Council on the amended Spelthorne Functional Economic Area analysis (dated September 2016). The Council welcomes this opportunity to comment.</p> <p>The report appears very similar to the report that Spelthorne issued for consultation in February 2016 and draws the same conclusions in relation to the strength of links between Runnymede and Spelthorne, which officers at Runnymede Borough Council continue to support. The only minor comments I have to make on this amended draft are as follows:</p> <p>(i) Page 12 refers to the Enterprise M3 Commercial Property Market Study (April 2013). The LEP refreshed this study and published an updated version in July 2016. It may be useful to refer to this updated document in your updated FEA analysis.</p> | <p>8. Runnymede Borough Council</p> <p>8.1 The report appears very similar to the report issued for consultation in February 2016 and draws the same conclusions in relation to the strength of links between Runnymede and Spelthorne, which officers at Runnymede continue to support.</p> <p>8.2 Page 12 refers to the Enterprise M3 Commercial Property Market Study (April 2013). The LEP refreshed this study and published an updated version in July 2016. It may be useful to refer to this updated version.</p> <p>8.3 The draft report refers to market intelligence from Colliers from Q3 2015. I am aware that Colliers have now published an updated snapshot from Q3 2016 which may be useful to refer to.</p> | <p>No disagreement with the findings of the report.</p> <p>8.1- Comment noted. 8.2 Page 12 to be updated. 8.3- Colliers snapshot to be updated. 8.4- Para 4.33 to be updated. 8.5- Para 9.9 to be updated.</p> <p>Agree to the following factual changes:</p> <ul style="list-style-type: none"> • Update page 12 to take account of updated Enterprise M3 Commercial Property Market Study. • Update Colliers snapshot to Q3 2016. • Change 'widening of Staines Bridge' to 'Staines Bridge Corridor Capacity assessment' at para 4.33 |

| Comment Ref No | Verbatim Comment | Summarised Comment | SBC Response |
|----------------|---|--|--|
| | <p>(ii) The draft report refers to market intelligence from Colliers from Q3 2015. I am aware that Colliers have now published an updated snapshot from Q3 2016 which it may be useful to refer to.</p> <p>(iii) Paragraph 4.33 refers to the widening of Staines Bridge. From the meeting held between officers at Spelthorne and Runnymede in August 2016, I understand that this scheme is now known as the Staines Bridge Corridor Capacity assessment. As such, would it be appropriate to amend the language in this paragraph to reflect this?</p> <p>(iv) Paragraph 9.9 refers to the expected decision relating to expansion at Heathrow Airport. Following the Government announcement on 25th October relating to airport expansion, it may be helpful to update this paragraph.</p> <p>I hope that these comments are helpful. Officers at Runnymede look forward to working with Spelthorne Borough Council on employment matters as both Authorities progress their local plans.</p> | <p>8.4 Para 4.33- refers to the 'widening of Staines Bridge'. From the meeting held between officers at Spelthorne and Runnymede in August 2016, I understand that this scheme is now known as the 'Staines Bridge Corridor Capacity assessment'. Would it be appropriate to amend the language to reflect this?</p> <p>8.5 Para 9.9- refers to the expected decision relating to the expansion of Heathrow Airport. This could be updated following the Government's announcement.</p> | <ul style="list-style-type: none"> • Update para 9.9 to take account of the Government announcement on Heathrow Airport. |
| 00028/2/001 | <p>Guildford Borough Council</p> <p>Thank you for consulting Guildford Borough Council on the Functional Economic Area Analysis (Draft, September 2016). The Council welcomes the recognition of the limited linkages between Spelthorne and Guildford and agree that stronger interactions are evident between both Councils and other Local Planning Authorities.</p> <p>For clarity, it is suggested that the document is amended to state whether the Functional Economic Area Spelthorne considers itself to fall within has been agreed by the other relevant authorities. The Council also consider that reference should be made within the Commercial Property Market Area chapter to the Enterprise M3 Commercial Property Market Study (July 2016), which provides an overview of the current office and industrial market in each of the Enterprise M3 LEP's commercial property market areas, including the Upper M3 area. Reference to such document will ensure that the FEA is based upon the most up-to-date and robust evidence available.</p> | <p>9. Guildford Borough Council</p> <p>9.1 The council welcomes the recognition of the limited linkages between Spelthorne and Guildford and agree that stronger interactions are evident between both Councils and other Local Planning Authorities.</p> <p>9.2 For clarity, it is suggested that the document is amended to state whether the FEA Spelthorne considers itself to fall within has been agreed by other relevant authorities.</p> <p>9.3 Reference should be made within the Commercial Property Market Area chapter to the Enterprise M3 Commercial Property Market Study (July 2016).</p> | <p>9.1 - Comment noted.</p> <p>9.2 - Table 17 in Chapter 8 details the extent of FEAs in the surrounding Local Authorities. Runnymede confirms that Spelthorne sits within its FEA; the Hounslow study notes links with surrounding authorities including Spelthorne; and Hillingdon Local Economic Assessment stated that the functional economic area extends through West London, into the Heathrow priority area containing a number of authorities including Spelthorne. Table to be update to take account of the Elmbridge FEA study published in April 2016 which also includes Spelthorne in its Functional Economic Area. Additional text to be added to para 8.2 to clarify whether other authorities have agreed to the extent of the Functional</p> |

| Comment Ref No | Verbatim Comment | Summarised Comment | SBC Response |
|----------------|------------------|--------------------|---|
| | | | <p>Economic Area that Spelthorne is considered to sit within.</p> <p>9.3 – Update report to take account of 2016 Enterprise M3 Commercial Property Market Study.</p> <p>Agree to the following factual changes:</p> <ul style="list-style-type: none"> • Update Table 17 to include Elmbridge FEA study and include additional text to para 8.2 to clarify if other authorities agree to the extent of the FEA. • Update study to take account of the updated 2016 Enterprise M3 Commercial Property Market Study. |

