

## Table of Comments & Officer Responses – Strategic Housing Land Availability Assessment (SLAA) draft Methodology

Rep No.	Organisation/Name	Comment	Response	Action
1	Equality and Human Rights Commission	<p>Thank you for your email dated 17 September 2015. The Commission does not have the resources to respond to all consultations, and will respond to consultations only where it considers they raise issues of strategic importance.</p> <p>While unfortunately we are unable to respond in this particular instance, the Commission has engaged in a wide range of work related to Gypsy and Travellers issues and therefore to assist I have referred you to some of the most relevant below.</p> <p>Public Sector Equality Duty Councils have duties under the Public Sector Equality Duty (PSED) set out in section 149 Equality Act. In the exercise of all its functions, it has a duty to have 'due regard' to three statutory equality needs: to eliminate discrimination and harassment; to advancing equality of opportunity between members of protected groups and others; and to foster good relations between persons who share a relevant protected characteristic and persons who do not.</p> <p>We provide advice for public authorities on how to apply the PSED, which is an on-going legal obligation and must be complied with as part of the planning process.</p> <p>The PSED is the mechanism through which public authorities involved in the planning process should consider the potential for planning proposals to have an impact on equality for different groups of people. You can find our technical guidance <a href="#">here</a>.</p>	<p>Comments noted.</p> <p>Regarding Gypsies and Travellers, the methodology considers the suitability of land for a number of uses including for traveller sites to meet the needs of Gypsies and Travellers in each LPA area The need is identified through a Traveller Accommodation Assessment (TAA), which identifies the level of need for traveller accommodation. Runnymede published its TAA in September 2014.</p> <p>An equalities impact assessment will be undertaken on both authorities' Local Plans, which the SLAA and TAA evidence will feed in to in determining site allocations for all sustainable development. The resources listed by the representation will be a useful tool in helping to prepare the evidence.</p>	No change.

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		<p>Commission Research Our research has shown that Gypsy and Traveller communities in Britain experience wide-ranging inequalities. Many stereotypes about Gypsy Travellers already exist, and negative attitudes and ingrained prejudices within parts of wider society can be hard to tackle. In addition, racism towards Gypsies and Travellers is still common and seen as justified.</p> <p>The Royal Town Planning Institute Guidance Notes also point out that Gypsies and Travellers are often treated as a group against whom it is acceptable to be prejudiced in the planning process.</p> <p>Please see links below to our research reports on Gypsies and Travellers below:</p> <p>'Inequalities experienced by Gypsies and Travellers' <a href="http://www.equalityhumanrights.com/about-us/our-work/key-projects/good-relations/gypsies-and-travellers-simple-solutions-for-living-together/gypsies-and-travellers-research-reports">http://www.equalityhumanrights.com/about-us/our-work/key-projects/good-relations/gypsies-and-travellers-simple-solutions-for-living-together/gypsies-and-travellers-research-reports</a></p> <p>'Simple Solutions for living together' <a href="http://www.equalityhumanrights.com/sites/default/files/documents/gypsies_and_travellers.pdf">http://www.equalityhumanrights.com/sites/default/files/documents/gypsies_and_travellers.pdf</a>"</p>		
2	Runnymede Access Liaison Group	Thank you very much for e-mailing the Land Allocation document. I appreciate that as borough residents that RALG are eligible to receive this. As you may note, I am including our administrator with this message. Our group usually exercises its interest in assessing the physical access issues of any amenities or public services in our area. By way of	Comment noted	No change.

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		example, RALG has considered features of the Longcross site where our RBC councillors, especially Cllr Mrs Dolsie Clarke have examined the plans in broad terms several months ago. This process is the most dedicated fulfilment of our role. To sum up, whenever there are plans where there may be physical access issues for our residents who may have special impairments then that we will be pleased to get involved with plans before any oversights have been created and then require belated and expensive remedy.		
3	Elmbridge Borough Council	We would broadly agree with the approach set out in the methodology with regard to considering constraints and the availability and deliverability of sites. My only comment would be as whether clearer reference should be made within paragraph 127 bullet point two as to the contingency measures that would be taken should there not be a five year housing land supply, such as a review of strategic employment sites or review of Greenbelt boundaries etc. as part of a new Local Plan. Given Runnymede's position I think this would better reflect the potential options available to both Council's prior to speaking to other authorities in the HMA and FEA.	Noted. The bullet points to paragraph 127 do set out a number of contingencies should both authorities not be able to identify a 5 year housing land supply. Specifically bullet 1 sets out that sites will be re-examined to establish whether constraints could be overcome and bullet 2 that other housing and policy options to increase housing delivery will be investigated. The necessity to continue discussions with Duty to Cooperate partners would be as well as, not instead of the other actions listed. However, agreed that this sentiment is not clear and that appropriate wording can be included in the SLAA methodology.	Add text to clarify actions for lack of 5 year housing land supply.
4	Transport for London	My only comment is that the draft SLAA methodology does not appear to specifically require consideration of transport accessibility, especially by public transport. In line with the NPPF, sites that are accessible by a range of transport options should be prioritised, particularly for higher density development.  TfL's interest is that, as the two local authority areas are close to Greater London, with Spelthorne directly adjacent,	Noted, the accessibility of sites will be taken into account when estimating development potential and site density. This will be clarified in the methodology.	Add text to clarify how accessibility will be considered.

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		siting higher density residential developments in areas that have limited or no access to public transport may result in increased car use, particularly for commuting, and this could increase traffic and congestion on the Transport for London Road network - primarily the A30 and A316 - and on the A318, which forms part of London's Strategic Road Network.		
5	Bracknell Forest BC	<p>We note that whilst the SLAA appears to relate to both housing and economic development, the focus appears to be on housing development. It would be helpful if reference could be included to what development types the SLAA relates to. For example housing: C2, C3 and gypsy and traveller uses; economic: B-uses and main town centre uses etc.</p> <p>We do have some concerns in relation to the sites which would be excluded from the SLAA:</p> <p>Flooding – agree with approach if it is clear this relates to flood zone 3b.</p> <ul style="list-style-type: none"> <li>• Green Belt (GB) – disagree with approach as only PDL sites within the GB should be included. The SLAA should be 'policy off'. All sites within the GB should be included. If needs for housing and other development cannot be achieved, this may then trigger the need to look at sites in the GB and undertake a review. However, if sufficient land is available outside of the GB, then GB sites would not need to be considered. It is acknowledged that a site being located within the GB may affect the 'suitability' scoring at stage 2, which requires account to be taken of the Development Plan and National Policy, but this should not exclude sites. This should be a Local Plan/allocation matter.</li> </ul>	<p>Noted. SLAA methodology to clarify which use classes of development will be included within the assessment.</p> <p>Noted.</p> <p>Noted and agreed in part. Paragraph 2 of the PPG note on <i>Housing &amp; Economic Land Availability Assessment</i> identifies that plan makers choose which sites to take forward from the assessment into the plan and para 3 advises that it is the role of the development plan itself to determine which of the sites are the most suitable. Para 9 sets out that the assessment should identify all sites and broad locations regardless of the amount of development needed and para 11 states that sites which have particular policy constraints should be included for the sake of comprehensiveness. However</p>	<p>Clarify which use classes will be considered in the assessment of sites.</p> <p>Amend methodology to include sites in the Green Belt for audit purposes but make clear that these are not to be considered suitable ahead of either authority undertaking</p>

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			<p>para 14 states that sites should be assessed against national policies and designations and para 19 that assessing the suitability of sites should be guided by the development plan, emerging plan policy and national policy. Therefore the approach to the SLAA is not 'policy off' in the same way as the SHMA.</p> <p>As such, when assessing the suitability of sites, regard should be had to national policy. In the case of Green Belt, the vast majority of development and uses are inappropriate aside from a few exceptions as set out in paragraphs 89 and 90 of the NPPF one of which are previously developed sites. Whilst it is agreed that in terms of comprehensiveness sites which come forward in Green Belt locations should not be excluded from the assessment, these sites will often clearly be inappropriate and as such unsuitable at the time of assessment. Whilst the SLAA will need to consider whether policy constraints can be overcome, this can only be informed by a Green Belt Assessment which has not yet been undertaken in Spelthorne and has been completed in Runnymede. A Green Belt Assessment will be undertaken in Spelthorne in due course. To suggest a site is 'suitable' ahead of any such assessment would be premature and give a false impression of land supply. Therefore, in-depth analysis of non PDL Green Belt sites will not be undertaken ahead of any Green Belt Assessment and is an approach consistent with the PPG note at paragraph 15.</p>	Green Belt Assessment.

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		<p>• Agricultural Land Classification - disagree with approach as all sites should be included. The SLAA should be 'policy off'. The NPPG specifically states (para 8-026): <i>The National Planning Policy Framework expects local planning authorities to take into account the economic and other benefits of the best and most versatile agricultural land. This is particularly important in plan making when decisions are made on which land should be allocated for development.</i> Therefore, consideration of land quality is a matter for the Local Plan and allocations. It is acknowledged that a site being located within the best and most versatile land may affect the 'suitability' scoring at stage 2, but this should not exclude sites.</p> <p>In relation to stage 2 and assessing the suitability of sites, it is not clear how the methodology relates to the NPPG (para. 03-019), as the focus appears to be on policy constraints such as Green Belt and flooding, and not other factors such as physical and environmental factors.</p>	<p>Noted, but again disagree that the SLAA is 'policy off'. However, as the NPPF does not set out that the highest agricultural land classification is an absolute constraint, then this should be clarified in the methodology and reflected in a site's potential. In any event all land outside of settlements in Spelthorne and Runnymede is designated as Green Belt and therefore any agricultural land will also be covered by the approach to Green Belt as stated above.</p> <p>Paragraph 92 of the draft methodology states that step 1 involves looking at constraints including physical, policy and legal constraints. The physical constraints set out in the PPG could be included in the SLAA methodology for information and how these will be considered against a site's potential clarified although the SLAA cannot be an exhaustive list of constraints.</p>	<p>Clarify approach to agricultural land in methodology.</p> <p>Amend SLAA methodology to clarify approach to physical constraints.</p>
6	Carter Jonas (on behalf of Muse)	<p>In fact, we only have one observation which relates to how Green Belt sites are to be treated as set out in paragraphs 41-43 of the Draft Methodology and in consequential paragraphs.</p> <p>The second sentence of paragraph 43 reads:</p>		

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		<p><i>“As such, in the first instance (in line with guidance in the PPG), detailed assessment of sites submitted will only take place for those sites located in the urban area and those sites in the Green Belt that are previously developed, which is considered compliant with the NPPF.”</i></p> <p>We can find no guidance in the PPG to the effect that Green Belt sites should not be included in a land availability assessment. Indeed, Paragraph: 010 Reference ID: 3-010-20140306 of the PPG relating to “What site/broad location size should be considered for assessment?” states:</p> <p><i>“The assessment should consider all sites and broad locations capable of delivering five or more dwellings or economic development on sites of 0.25ha (or 500m2of floor space) and above. Where appropriate, plan makers may wish to consider alternative site size thresholds.”</i> (our emphasis)</p> <p>Paragraph: 011 Reference ID: 3-011-20140306 on “How should sites/broad locations be identified?” goes on to advise that:</p> <p><i>“Sites, which have particular policy constraints, should be included in the assessment for the sake of comprehensiveness but these constraints must be set out clearly, including where they severely restrict development. An important part of the desktop review, however, is to test again the appropriateness of other previously defined constraints, rather than simply to accept them.”</i> (our emphasis)</p> <p>It is recognised that Green Belt boundaries can only be changed through the Local Plan process, but a SLAA is an</p>	<p>Noted and agreed in part. Paragraph 2 of the PPG note on <i>Housing &amp; Economic Land Availability Assessment</i> identifies that plan makers choose which sites to take forward from the assessment into the plan and that para 3 advises that it is the role of the development plan itself to determine which of the sites are the most suitable. Para 9 sets out that the assessment should identify all sites and broad locations regardless of the amount of development needed and that para 11 states that sites which have particular policy constraints should be included for the sake of comprehensiveness. However para 14 states that sites should be assessed against national policies and designations and para 19 that assessing the suitability of sites should be guided by the development plan, emerging plan policy and national policy.</p> <p>As such, when assessing the suitability of sites, regard should be had to national policy. In the case of Green Belt, the vast majority of development and uses are inappropriate aside from a few exceptions as set out in paragraphs 89 and 90 of the NPPF one of which is the redevelopment of previously developed sites.</p>	<p>Amend methodology to include sites in the Green Belt for audit purposes but make clear that these are not to be considered suitable ahead of either authority undertaking Green Belt Assessment.</p>

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		<p>important element of the evidence base on which the future Local Plan will be based and is a wholly appropriate document in which the development potential of Green Belt sites should be assessed. The outcome of this assessment can and should inform the evolution of the Local Plan, including the identification of sites that can be developed to meet the future Plan's housing policy requirements. So doing will also assist the Council in its Local Plan review of the Green Belt boundary to ensure that it endures in the long term and that land which it is unnecessary to keep permanently open is not included in accordance with Paragraphs 83 and 85 of the NPPF.</p> <p>The wording of Paragraph 43 of the SLAA Draft Methodology should be amended to confirm that the potential of Green Belt sites will be assessed. This change will also require some amendment to Paragraph 76 (delete the words "previously developed" in the first sentence) and the scope of paragraph 104 will need to be widened to refer to site inspection of Green Belt sites whether or not they are previously developed land.</p>	<p>Whilst it is agreed that in terms of comprehensiveness sites which come forward in Green Belt locations should not be excluded from the assessment, these sites will clearly be inappropriate and as such unsuitable at the time of assessment. Whilst the SLAA will need to consider whether policy constraints can be overcome, for Green Belt sites this can only be informed by a Green Belt Assessment which has not yet been undertaken in Spelthorne but has been completed in Runnymede. A Green Belt Assessment will be undertaken in Spelthorne in due course. To suggest a site is 'suitable' ahead of any such assessment would be premature and give a false impression of land supply. Therefore, in depth analysis of Green Belt sites will not be undertaken ahead of any Green Belt assessment and is an approach consistent with the PPG note at paragraph 15.</p>	
7	NLP (on behalf of Inland Homes)	<p>On behalf of our client, Inland Homes, we enclose representations to the Draft Strategic Land Availability Assessment (SLAA) Methodology (September 2015). Inland Homes is a dynamic developer of urban regeneration projects with a particular emphasis on residentially led mixed-use schemes on brownfield sites including sites within the Borough.</p> <p>Our client welcomes the opportunity to submit comments on the methodology and we would be grateful if you could keep us informed of progress on the next stages of consultation</p>	Noted.	

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		<p>and 'Call for Sites' process later this year or in 2016.</p> <p>We recognise the difficulty the Council has in identifying land for development, particularly given the Green Belt and flood risk issues.</p> <p>We do not have any fundamental concerns with the proposed methodology. However, given the Borough's potential land constraints, our client considers that, in the first instance, there should be a strong emphasis on promoting and seeking to maximise the delivery of development on brownfield sites. Secondly, it will be important to seek to achieve higher density development on such urban and sustainable sites where appropriate. This approach should form a key part of the assessment of a site's potential for development as part of 'Step 1: Estimating the development potential of a site' within Stage 2: Site/broad location assessment as set out in paragraphs 90-92 of the SLAA methodology.</p> <p>The approach is consistent with national policy guidance (NPPF paragraph 111) which encourages and promotes the re-use and redevelopment of brownfield land. In addition, the promotion of high density development should be encouraged on sites which have good transport links and are in town centre locations as a means of contributing towards the Borough's housing need. The key benefit of this strategy is that it will reduce the pressure on the Borough to release greenfield land for development.</p> <p><i>(In relation to Spelthorne)</i> as you will be aware, the Council's adopted plan is out of date and its housing need of 166 homes per annum was based on figures set out in the revoked South East Plan Regional Spatial Strategy (RSS).</p>	<p>Noted. When considering a site's potential, regard will be had to the location of development and its sustainability and whether higher density development can be achieved in areas such as town centres or those served with or accessible to good transport links. Paragraph 67 of the draft Methodology sets this out for Runnymede, but it could be repeated in para 68 for Spelthorne.</p> <p>Noted, however, both authorities Local Plans will need to balance the need for housing and other forms of development with its ability to meet this need when taking into account constraints and</p>	<p>Clarify approach to density in town centre locations.</p>

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		<p>The recently published Spelthorne and Runnymede SHMA (May 2015) identifies an objectively assessed housing need (OAN) of 534-725 homes per annual (2013-2033) which is a significant increase on the South East Plan RSS requirement. The assessment does not take into account external factors or constraints such as Green Belt and flood risk. Given that these constraints are evident in SBC, the need to deliver a minimum three-fold increase in housing delivery and the importance of realising the potential of existing brownfield sites through high density development.</p> <p>Our client has identified opportunities for taking forward development of brownfield sites in Staines Town Centre and the former Brooklands College site in Ashford. These are town centre sustainable brownfield sites which can make a significant contribution towards meeting the Borough's OAN and which we will be putting forward as development sites as part of the Call for Sites process.</p> <p><b>Concluding Remark</b></p> <p>We trust our client's representation will be addressed as the document progresses and we request that we are kept updated of any amendments to the Methodology and the next Stages of the SLAA process.</p>	<p>infrastructure capacity as well as land supply. Whilst it is noted that higher density development may be appropriate in some locations, this will not be the case in all areas and as such this will need to be considered on a site by site basis with regard to the character of an area and the design of the proposal. The figure of 166 is not a housing need figure but the adopted housing target in the Spelthorne Core Strategy &amp; Policies DPD.</p> <p>Noted.</p>	
8	Notcutts	<p>We agree with the general approach to be taken jointly by your Authorities. However the introduction of the SLAA as opposed to the former SHLAAs aims to look at the development potential of a site for the most appropriate use.</p> <p>Whilst the draft Site Assessment pro-formas include a section for the site owner / promoter to indicate whether they would</p>	<p>Noted.</p> <p>It is the intention that whoever submits the pro-forma indicates what uses they believe a site</p>	N/A

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		<p>consider uses other than housing it is unclear under this new system what will occur if a site fails to meet the criteria for a single identified use. If through the assessment process a site fails to meet the proposed use criteria for allocation, but is identified by the Authority as being well suited and appropriate for allocation for an alternative use, is it proposed that the Authority will be pro active by opening discussions with a landowner or highlighting alternative potential?</p> <p>We thank you for the opportunity to comment and would ask you to ensure that we are kept on your consultation database for all future Local Plan consultations. We understand that a call for sites is likely to follow this methodology consultation and we would ask to be included on your list of consultees for this and any subsequent consultations.</p>	<p>could come forward for whether for example this is residential, office, retail or mixed use. The authority will then consider whether one or more (or none) of the uses is suitable.</p> <p>Noted.</p>	
9	Martin Leay Associates (on behalf of Stellican Ltd)	<p><i>Representation made in relation to a site submitted to the Runnymede SLAA call for sites, in particular relating to student housing.</i></p> <p>This Representation follows previous MLA contact with Runnymede Borough Council over Green Belt Review and Allocation of Sites for Student Housing: in considering the potential suitability of any site to provide off-campus student housing in support of RHUL, it is considered a fundamental requirement that the site should be located sufficiently close to RHUL to allow for ready access on foot and/or by bicycle. In other words, potential student accommodation sites cannot be reviewed in the same way as open market housing sites or other potential land uses.</p> <p>MLA has previously communicated to the Council that it would surely be flawed for the Local Plan to promote and support such University expansion without allowing sufficient</p>	<p>Noted</p> <p>Noted</p>	



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		<p><b>Purpose:</b> in reviewing sites in the Green Belt with potential for future allocation and development, assessment should be made of the implications for the removal of such sites from the existing Green Belt Designation. In the case of the Blay's Lane site, it can be seen that other development forming part of the Englefield Green settlement already defines the "narrowest gap" between settlements and which distance would not be eroded by the removal of the Blay's Lane site from the Green Belt Designation (see marked up distances on MLA 226/23).</p> <p><b>Conclusions to Representation on SLAA</b></p> <p><b>Methodology:</b> as noted in the above numbered points, the SLAA Methodology for identifying off-campus student accommodation in association with the Royal Holloway University of London (and its approved Masterplan for expansion) needs to be refined in order to identify suitable sites in sufficient proximity to RHUL.</p>	<p>Review to consider</p> <p>If the location of any proposal for student accommodation was considered sustainable, a planning application that was submitted for such a use could not be refused simply because it wasn't located within a 'sufficient proximity'. If a site owner adjacent to the university whose site was located in the Green Belt submitted a planning application, both national and local Green Belt policy would apply to the consideration of the site for such a use. It is therefore not considered that the SLAA methodology requires refining in relation to the location of student accommodation in relation to RHUL, as it would be for the Local Plan to consider appropriate student site allocations.</p>	
10	Kempton Residents Association	<p>Thank you for the submission of the SLAA document. We would draw your attention to Para 15 on page 4 which states:</p> <p>15. Runnymede Borough Council has also commissioned independent consultants to complete work on a borough-wide Green Belt review. The Green Belt review was completed in December 2014, which identifies a limited number of land</p>	<p>Spelthorne has not yet undertaken any form of Green Belt Assessment as Spelthorne is still in the early stages of evidence gathering whereas Runnymede are further ahead in their plan</p>	

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		<p>parcels that could be returned to the urban area as they are considered by the consultant to no longer meet the purposes of including the land within the Green Belt.</p> <p>Later on, in the document, Runnymede Council goes on to say that Spelthorne has chosen not to undertake a similar review. Is this correct, and if so, why not?</p> <p>We would also be interested to know what took place between Spelthorne and The Jockey Club/Redrow in the recent meeting concerning their input to the Local Plan. This ongoing dialogue between The Jockey Club and Spelthorne Council is causing deep concern about the future of Kempton Park, and we strongly urge the Council to substantiate its pledge to preserve the status of the Green Belt.</p> <p>Finally, we would be grateful if you would advise us of the next stage in the proceedings when stakeholders will be approached for consultation.</p>	<p>timetable. However, Spelthorne acknowledge that it will be necessary to undertake a Green Belt Assessment at some point which considers whether the Green Belt still meets its purpose as defined by paragraph 80 of the NPPF.</p> <p>For clarification, with regard to Arup's independent strategic review of Runnymede's Green Belt, in most cases, the parcels of land that were identified less strongly met the purposes of the Green Belt than other Green Belt land, rather than no longer met the purposes at all.</p> <p>A meeting was held at Redrow Homes request as it was considered in the wider public interest to establish what their plans were and encourage them make this public. Redrow's subsequent press release, and information on their web site, explains what they are intending and had told officers. Encouraging transparency on the part of the Jockey Club, and any other parties is something Spelthorne said they would do when addressing the public meeting on Kempton Park earlier in February this year. The opportunity was taken at the recent meeting to remind Redrow of the Council's strong stance on the Green Belt.</p> <p>Noted</p>	

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11	Lower Sunbury Residents Association (LoSRA)	<p>I write in response to the publication of the draft methodology. The 5 stages outlined for the production of the SLAA on P14 seem reasonable. LoSRA has two main concerns at this stage:</p> <p>1) Does Spelthorne BC intend to carry out a Green Belt assessment, as Runnymede BC have done – and if not, why?</p> <p>2) What opportunities are there for LoSRA to have input to this process, e.g. through the Development Market Panel; we also reiterate our concerns expressed in our earlier submission to the draft SHMA viz .... unless the process is opened up to give a voice to individual residents and amenity groups among the “stakeholders” alongside the housing developers, so that those stakeholders who are to be given access to aspects of the process are accorded the possibility of making a real difference to the decisions and outcome, subsequent consultations on this issue will inevitably focus on the propriety of how the outcome was achieved.</p>	<p>Noted.</p> <p>Spelthorne has not yet undertaken any form of Green Belt Assessment for the current Local Plan review as Spelthorne is still in the early stages of evidence gathering whereas Runnymede are further ahead in their plan timetable. However, Spelthorne acknowledge that it will be necessary to undertake a Green Belt Assessment at some point which considers whether the Green Belt still meets its purpose as defined by paragraph 80 of the NPPF.</p> <p>The PPG note on Housing and Economic Land Availability Assessments states a number of groups that local authorities should involve in a land availability assessment, but does not set out how such groups should be involved. Paragraph 21 of the draft SLAA methodology sets out the concept of forming a Development Market Panel to advise both Councils on technical aspects of the SLAA such as on viability assumptions and provide market commentary. This would be for both residential (including Gypsies and Travellers) and economic development. The Panel is proposed to be formed from those parties listed in the PPG note on Housing &amp; Economic Land Availability Assessments that hold</p>	<p>Both authorities to discuss how DMP will be formed and run.</p> <p>Add text to clarify that DMP is not a decision making body and does not consider whether sites should be allocated for development through the</p>

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			<p>industry/market knowledge such as developers, local property agents and registered providers and can advise on such technical issues. The Panel will not however, be an opportunity for any one party to promote a particular site or to attempt to gain an advantage or influence the Local Plan process. This will be made very clear in a Terms of Reference for the Panel which will be placed on the Council's website along with any minutes arising from Panel meetings.</p> <p>Further, the Panel is only to advise on technical aspects, it is not a decision making group/body or a committee and will not consider whether sites should be given development status or not. Such decisions will be a matter for the Local Plan supported by a Sustainability Appraisal. This can be made clearer in the draft methodology text. However, at this early stage the DMP has not yet been formed or any decision made on how it will be run. As such, it may be that each authority will hold its own separate DMP.</p> <p>In terms of involving other stakeholders as identified in the PPG, the draft methodology indicates that separate panels for each authority will be set up to involve local communities, businesses and business organisations in a similar fashion to the DMP. Such panels are likely to have less of a technical focus, but still enable discussion of the same material as the DMP and would not preclude any party from commenting on technical issues if they wish.</p>	Local Plan or not

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		<p>As a matter of clarification, we take it that in Para 124 on P22, the use of the word 'Council' refers to both Runnymede and Spelthorne – that being the case, we note that in Para 125, P22, reference is made to 'if it is considered sites within the urban area and previously developed sites in the Green Belt cannot meet the housing requirements along with Reserve sites that have come forward for development in Runnymede, the PPG advises in respect of housing that it</p>	<p>However, it needs to be recognised that not every party representing local communities, businesses or business organisations will necessarily wish to discuss or have an in-depth understanding of the technical issues but will still wish to be involved and as such there is role for such a panel. Like the DMP a panel's role would not be to comment on the likelihood of a site being allocated or not and would be subject to a Terms of Reference with minutes of meetings placed on the Councils' websites. Again like a DMP a panel would not be a decision making group/body or committee. Runnymede has already indicated in paragraph 24 of the draft SLAA methodology that they are proposing a Community Panel to take on this role whereas Spelthorne have indicated this would be through a Local Plan Forum. How a DMP will be run and its form will need to be discussed further between the two authorities and within each organisation in due course.</p> <p>Paragraph 125 refers to both Council's in terms of urban areas and previously developed sites in the Green Belt, however, Runnymede is mentioned in the paragraph because it has reserve sites in the Green Belt identified through previous Local Plans whereas Spelthorne does not have any such designations. This can be made clearer in the text.</p>	<p>Amend text in para 125.</p>

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		<p>may be necessary to plan how this shortfall should best be managed. Can you please advise why Spelthorne is not included in this paragraph and what the alternative proposed is?</p>		
12	Surrey Heath Borough Council	<p>Thank-you for consulting Surrey Heath, Rushmoor and Hart in relation to the 2015 Runnymede &amp; Spelthorne draft SHLAA Methodology. This response is submitted on behalf of these 3 authorities who together comprise an HMA &amp; FEA.</p> <p>Our comments on the draft SHLAA Methodology are as follows:</p> <ul style="list-style-type: none"> <li>• The decision to base the SHLAA Methodology on the PPG guidance and to include economic and traveller sites within the assessment is welcomed.</li> <li>• In Paragraph 76 it would be useful to make it clearer whether or not the 0.25 ha site threshold applies to both the housing and economic sites, or just to the economic. At the moment the text reads ambiguously.</li> <li>• With regards to Green Belt sites, Paragraph 43 indicates that only PDL in the Green Belt will be considered for inclusion within the SHLAA. No reference is made to rural exception sites other than in Paragraph 98 where the document notes that both council's do not anticipate such sites will come forward over the plan period. This seems a little curious in light of the Government's starter and self/custom-build homes agenda which could be particularly suited for delivery on rural exception sites. It may be appropriate for a more pro-active approach to be taken to rural exception sites in the Methodology.</li> </ul>	<p>Noted.</p> <p>Noted. Paragraph 76 to be amended to clarify site size thresholds.</p> <p>There are no locations in Spelthorne or Runnymede which are so removed from the urban area that they could be defined as 'rural' and as such a rural exceptions site would not be applicable within either Borough.</p>	Amend para 76.

Rep No.	Organisation/Name	Comment	Response	Action
		<p>• It is noted that that the Methodology will apply a minimum density of 30 dpha on sites although it is acknowledged that on PDL town centre sites this may be higher. The rationale for the density is based on policy documents stretching back to 2000 and all have now been superceded. As we are all aware the country is facing a housing crisis and land supply is a key constraint on delivery. It is important that the most effective use is made of land in the supply chain and increasing density is one of the ways of doing this. This is especially important in Spelthorne and Runnymede who both sit within the London fringe. The Surrey Heath, Rushmoor and Hart HMA partners would encourage Runnymede and Spelthorne consider maximising their land supply by:</p> <ul style="list-style-type: none"> <li>o Taking a more bespoke, site specific approach to density</li> <li>o Applying more ambitious density levels for all sites</li> <li>o Indicating the range of density targets the authorities will be pursuing in town centre locations and taking a very ambitious density approach in these places.</li> </ul> <p>• If the land supply for the HMA does prove to be insufficient to meet identified housing need, Surrey Heath, Rushmoor and Hart would expect that Runnymede &amp; Spelthorne would investigate whether the shortfall could be addressed through</p>	<p>Paragraph 68 makes reference to Spelthorne's adopted policy on site density (Policy HO5). The Policy allows densities ranging from 35 -55 dwellings per hectare in areas predominated by family housing and 75 dwellings per hectare and above in Staines Town Centre. Whilst this policy will be used as the basis for considering site potential, reference to considering densities on a site by site basis can be added.</p> <p>Runnymede does not have an up-to-date adopted policy on housing densities and it will be for the Local Plan to determine the approach taken. In the absence of such policy, Runnymede will apply an absolute minimum density of 30 dph in consideration of sites, which will be assessed in more detail on a case by case basis. DCLG's <i>Land use change statistics in England: 2013/14</i> states average national development densities of between 32-37 dph, dependent on the type of land being developed. Whilst this only gives an indication, until such a time that Runnymede has an adopted Local Plan, the approach taken in the methodology seems reasonable.</p> <p>Noted, however if a shortfall against needs is identified, both authorities will still need to consider the balance between needs and constraints, infrastructure capacity and supply. As such, if needs cannot be met having made</p>	<p>Amend para 68.</p>

Rep No.	Organisation/Name	Comment	Response	Action
		Green Belt release.	'every effort' to do so, discussions will be required under the Duty to Cooperate, including with authorities in neighbouring housing market areas such as Surrey Heath, Rushmoor and Hart.	
13	Royal Borough of Windsor & Maidenhead	<p>Thank you for consulting the Royal Borough of Windsor and Maidenhead on the Spelthorne and Runnymede Draft Strategic Land Availability Assessment Methodology. This response is made jointly to the consultation undertaken by each council. RBWM's comments are shown below and are split into general and specific headings.</p> <p><u>General Comments</u></p> <p>1. It is suggested that the SLAA methodology should be broadly consistent with that used in other areas with which the two councils may have to join to undertake a strategic SHMA.</p> <p>2. The Berkshire authorities are currently undertaking a similar exercise with regard to agreeing a joint methodology for a HELAA (essentially the same exercise as the SLAA) and would be happy to share the methodology with you at the appropriate time.</p> <p>3. Throughout the document, when considering which sites should be included and assessed in the SLAA exercise, it is unclear whether particular topics are considered to be exclusion criteria or suitability criteria. This is particularly true of the sections relating to green belt and minerals and waste, which are subjects that RBWM considers should both be regarded as suitability criteria. Greater clarity is requested</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted. Paragraph 2 of the PPG note on <i>Housing &amp; Economic Land Availability Assessment</i> identifies that plan makers choose which sites to take forward from the assessment into the plan and that para 3 advises that it is the role of the development plan itself to determine which of the sites are the most suitable. Para 9 sets out</p>	<p>Amend methodology to include sites in the Green Belt for audit purposes but make clear that</p>

Rep No.	Organisation/Name	Comment	Response	Action
		throughout the document.	<p>that the assessment should identify all sites and broad locations regardless of the amount of development needed and that para 11 states that sites which have particular policy constraints should be included for the sake of comprehensiveness. However para 14 states that sites should be assessed against national policies and designations and para 19 that assessing the suitability of sites should be guided by the development plan, emerging plan policy and national policy.</p> <p>As such, when assessing the suitability of sites, regard should be had to national policy. In the case of Green Belt, the vast majority of development and uses are inappropriate aside from a few exceptions as set out in paragraphs 89 and 90 of the NPPF one of which is the redevelopment of previously developed sites. Whilst it is agreed that in terms of comprehensiveness sites which come forward in Green Belt locations should not be excluded from the assessment, these sites will clearly be inappropriate and as such unsuitable at the time of assessment. Whilst the SLAA will need to consider whether policy constraints can be overcome, for Green Belt sites this can only be informed by a Green Belt Assessment which has not yet been undertaken in Spelthorne and completed in Runnymede. A Green Belt Assessment will be undertaken in Spelthorne in due course. To suggest a site is 'suitable' ahead of any such assessment would be premature</p>	these are not to be considered suitable ahead of either authority undertaking Green Belt Assessment. Clarify approach to minerals/waste sites.

Rep No.	Organisation/Name	Comment	Response	Action
		<p><u>Specific Comments</u></p> <p>1. RBWM agrees with the approach suggested towards the following constraints:</p> <ul style="list-style-type: none"> <li>• Flooding</li> <li>• River Thames Scheme</li> <li>• Agricultural land</li> <li>• Sites of international and nature conservation importance</li> <li>• Heathrow public safety zone</li> <li>• Heathrow noise contours</li> </ul> <p>2. Para 79 sets out sources to be used in a desk-based study of sites, and para. 80 refers to a call for sites. These are both largely reactive processes. It is questioned whether the councils intend to also proactively look for sites e.g. to talk to major landowners with a view to enabling sites to be brought forward.</p>	<p>and give a false impression of land supply. Therefore, in-depth analysis of non PDL Green Belt sites will not be undertaken ahead of any Green Belt assessment and is an approach consistent with the PPG note at paragraph 15.</p> <p>In terms of minerals/waste sites it is agreed that these are policy constraints which may render a site unsuitable but not a reason for exclusion. These sites would however, need to be discussed with Surrey County Council as the minerals/waste authority. This can be clarified in the methodology.</p> <p>Noted.</p> <p>Both Councils do intend to proactively look for sites and this could be better explained in the methodology.</p>	<p>Amend para 79.</p>

Rep No.	Organisation/Name	Comment	Response	Action
		<p>3. It is considered that the list of potential sources for sites set out in para. 79 should be consistent with the list at Paragraph: 012 Reference ID: 3-012-20140306 of the National Planning Practice Guidance.</p> <p>4. Para. 82 states that sites will be removed from the SLAA database if there has been no contact from the landowners after two years. It is questioned whether the councils will proactively chase for a response e.g. undertake land registry searches to ascertain whether sites have been sold. It is also suggested that the councils should take a pragmatic view on developability, rather than having a hard and fast rule about site removal, as it is likely that some sites will be developable within the plan period even if they are not immediately available.</p> <p>5. Para. 92 states that the approach to absolute constraints is set out in paras. 41-60. As stated earlier, these paragraphs do not appear to provide clarity on which constraints are regarded as exclusion criteria and which as suitability criteria, and further clarity is requested on this point.</p> <p>6. Windfall calculation is based around trend analysis, and differs between the two council areas. This is considered appropriate in principle. However, the periods examined (5 years for Runnymede and 7 years for Spelthorne) are quite short and both fall completely within a recessionary period. It is questioned whether a more buoyant economic period would lead to an increased supply of windfalls, and it is therefore suggested that trends in windfalls be analysed over a longer period that would cover a complete market cycle.</p>	<p>Noted.</p> <p>Noted. Both authorities will ensure that sites are not removed before undertaking appropriate checks.</p> <p>Noted. Clarification to be added.</p> <p>Noted.</p>	<p>Clarify difference for exclusion and suitability.</p>
14	Terrence O'Rourke on behalf of Redrow	Thank you for inviting us to comment on your draft SLAA Methodology, being undertaken in conjunction with	Noted.	

Rep No.	Organisation/Name	Comment	Response	Action
	Homes	<p>Runnymede Borough Council. Terence O'Rourke Ltd is taking an active interest in the Local Plan preparation in both Boroughs. These comments are submitted on behalf of Redrow Homes Ltd.</p> <p><u>Green Belt</u> Ahead of the finalised Strategic Housing Market Assessment (SHMA) and the identification of a housing target, we consider it is premature to rule out any Green Belt development (aside from previously developed sites) given it constitutes the primary land use designation within the Borough and given that the NPPF explicitly enables the alteration of Green Belt boundaries through local plan review. You will be aware of a number of local planning authorities who have advanced Green Belt review through the local plan process in order to meet national objectives of boosting significantly the supply of housing (including the need to meet objective assessment of housing need). In all cases, examining inspectors have endorsed the approach, finding it to be appropriate, reasonable and sound.</p> <p>It is recognised that, as a consequence of the earlier withdrawal of their submitted Core Strategy in 2014, Runnymede are running ahead of Spelthorne in their Local Plan preparation, but it is telling how different each Council is taking their responsibilities in terms of delivering their housing need and reviewing their Green Belt. Indeed the examining Inspector in respect of Runnymede's withdrawn local plan did not question the position that Green Belt review should be undertaken, to identify whether or not there are any potential sites that could be released from the Green Belt, only that all reasonable alternative Green Belt sites (alongside the major developed site within the Green Belt) should be properly</p>	<p>Noted. Paragraph 2 of the PPG note on Housing &amp; Economic Land Availability Assessment identifies that plan makers choose which sites to take forward from the assessment into the plan and that para 3 advises that it is the role of the development plan itself to determine which of the sites are the most suitable. Para 9 sets out that the assessment should identify all sites and broad locations regardless of the amount of development needed and that para 11 states that sites which have particular policy constraints should be included for the sake of comprehensiveness. However para 14 states that sites should be assessed against national policies and designations and para 19 that assessing the suitability of sites should be guided by the development plan, emerging plan policy and national policy.</p> <p>As such, when assessing the suitability of sites, regard should be had to national policy. In the case of Green Belt, the vast majority of development and uses are inappropriate aside from a few exceptions as set out in paragraphs 89 and 90 of the NPPF one of which is the redevelopment of previously developed sites. Whilst it is agreed that in terms of</p>	<p>Amend methodology to include sites in the Green Belt for audit purposes but make clear that these are not to be considered suitable ahead of either authority undertaking Green Belt Assessment.</p>

Rep No.	Organisation/Name	Comment	Response	Action
		<p>considered.</p> <p>Hence, Runnymede has commissioned a borough-wide Green Belt Review and is now undertaking a detailed technical review of the Green Belt boundary to inform its Local Plan review (Paragraph 15). In contrast, Spelthorne has made no formal commitment to Green Belt review, despite a higher housing need being identified within the draft SHMA.</p> <p>We consider that this approach fails to acknowledge the balance of national priorities, recognising the conflict between meeting housing needs and protecting the Green Belt, and is unsound. There is no definitive requirement in the national guidance in respect of housing land availability assessments that indicate that the SLAA should rule out sites within the Green Belt. At this stage, we consider Green Belt sites should be identified for further consideration, although clearly it is important to note the policy constraint.</p> <p><u>Flooding</u> Whilst the PPG confirms that residential development is acceptable in Flood Zone 2, subject to the sequential test being passed, and acceptable in Flood Zone 3a subject to the sequential test and exception test being passed, we agree that such sites should only be included within the housing trajectory where they have received planning permission (Para 47) or following the completion of an updated Strategic Flood Risk Assessment and Strategic Sequential Test (Para 48).</p> <p>Clearly, there are good reasons to avoid development in the flood plain, and a national commitment to this. It is unjustified</p>	<p>comprehensiveness sites which come forward in Green Belt locations should not be excluded from the assessment, these sites will clearly be inappropriate and as such unsuitable at the time of assessment. Whilst the SLAA will need to consider whether policy constraints can be overcome, for Green Belt sites this can only be informed by a Green Belt Assessment which has not yet been undertaken in Spelthorne and completed in Runnymede. A Green Belt Assessment will be undertaken in Spelthorne in due Course. To suggest a site is 'suitable' ahead of any such assessment would be premature and give a false impression of land supply. Therefore, in-depth analysis of non PDL Green Belt sites will not be undertaken ahead of any Green Belt assessment and is an approach consistent with the PPG note at paragraph 15.</p> <p>Noted.</p> <p>Comments on Green Belt as above.</p>	

Rep No.	Organisation/Name	Comment	Response	Action
		<p>therefore that the SHLAA methodology treats the flood plain as less of a constraint than Green Belt.</p> <p><u>Agricultural Land</u> Both authorities will seek to protect the best quality agricultural land, in line with the NPPF, and it is commented that Runnymede has undertaken this work as part of their Green Belt Review, but again there is no indication as to where/when Spelthorne will be undertaking this work.</p> <p><u>Housing Densities</u> It is stated that housing densities will be assessed in line with Policy HO5 of the Core Strategy &amp; Development Policies DPD (adopted 2009) i.e. whereby densities lower than 35 dwellings per hectare are not normally considered to be acceptable. The Government removed the PPG3/PPS3 target of a minimum of 30 dwellings per hectare back in 2010, after the adoption of the Core Strategy (which is now inconsistent with the NPPF in a number of respects, including in relation to densities). Given much of the existing development within the Borough will have been developed at less than 35 dwellings per hectare, this approach is questioned. For comparison, Runnymede is utilising a density of 30 dwellings per hectare, and accept that historic densities have averaged around 18 dwellings per hectare.</p> <p>Given the similarities between the boroughs, it is unclear as to why 2 different densities are being utilised.</p>	<p>Comments on Green Belt as above.</p> <p>Noted, but Policy HO5 of the Spelthorne Core Strategy &amp; Policies DPD is still considered relevant in assessing site density when considering a site's potential. Policy HO5 allows densities ranging from 35 -55 dwellings per hectare in areas predominated by family housing and 75 dwellings per hectare and above in Staines Town Centre. This is entirely consistent with NPPF paragraph 58 Bullet 3 in optimising the potential of a site. However, whilst this policy will be used as the basis for considering site potential in Spelthorne, reference to considering densities on a site by site basis can be added. In terms of the different approach to densities, whilst Spelthorne and Runnymede lie within the same Housing Market Area, the character of the two areas is different with Runnymede being less urbanised with historically lower density forms of development. However, the increase to 30dph as a minimum recognises the need to increase the supply of housing, rather than accept past performance, but again reference to</p>	<p>Amend para 68.</p>

Rep No.	Organisation/Name	Comment	Response	Action
		<p><u>Windfalls</u> Whilst windfalls are currently excluded from (<i>Spelthorne Borough</i>) Council's 5 year housing land supply figure (Para 109) and the Council has demonstrated that windfalls are not required to meet the 5 year housing land supply target (based on the housing requirement in the Core Strategy – which does not represent the objective assessment of housing need and is, in this respect, inconsistent with the NPPF), it appears somewhat premature to assume this will continue to be the case, ahead of the establishment of a new housing target for the Borough. The new requirement will need to be tested through a stepped approach, as referred to by the Courts (e.g. Gallagher &amp; Lioncourt Homes and Solihull MBC EWHC 1283).</p> <p><u>Permitted Development</u> Post-publication of the Draft Methodology, the Government have confirmed that the Permitted Development changes are to be made permanent. Whilst this has been a source of new housing delivery in Spelthorne, there is only a finite supply of existing offices and if they are to be included within the housing trajectory then the Council needs to take this into account, and the need to retain business accommodation over the medium to long term to meet other planning objectives.</p>	<p>considering densities on a site by site basis can be added.</p> <p>Noted, however, the PPG note on <i>Housing &amp; Economic Land Availability Assessment</i> advises at paragraph 31 that the figures in latest housing needs assessments should be considered, but that the weight given to these assessments should take account of the fact that they have not been tested or moderated against relevant constraints. As such, Spelthorne will continue to calculate Windfalls as set out in the draft SLAA methodology.</p> <p>Noted. Text to be amended to reference that office to residential PD has been made permanent.</p>	<p>Amend para 114.</p>
15	Staines Town Society	Staines Town Society thanks Spelthorne BC for the opportunity to participate in the consultation on the draft SLAA methodology, and responds as follows:		

Rep No.	Organisation/Name	Comment	Response	Action
		<p>Para 21 Property developers should not be members of the Development Market Panel, as they have a conflict of interest (in promoting the concept of development, as well as for particular sites). The DMP should contain planners, independent experts, and representatives of residents, as residents will be affected by these decisions. Para 8 of the PPG includes local communities in the list of partners.</p>	<p>The PPG note on Housing and Economic Land Availability Assessments states a number of groups that local authorities should involve in a land availability assessment, but does not set out how such groups should be involved. Paragraph 21 of the draft SLAA methodology sets out the concept of forming a Development Market Panel to advise both Councils on technical aspects of the SLAA such as on viability assumptions and provide market commentary. This would be for both residential (including Gypsies and Travellers) and economic development. The Panel is proposed to be formed from those parties listed in the PPG note on Housing &amp; Economic Land Availability Assessments that hold industry/market knowledge such as developers, local property agents and registered providers and can advise on such technical issues. The Panel will not however, be an opportunity for any one party to promote a particular site or to attempt to gain an advantage or influence the Local Plan process. This will be made very clear in a Terms of Reference for the Panel which will be placed on the Council's website along with any minutes arising from Panel meetings. Further, the Panel is only to advise on technical aspects, it is not a decision making group/body or a committee and will not consider whether sites should be given development status or not. Such decisions will be a matter for the Local Plan supported by a Sustainability Appraisal.</p>	<p>Both authorities to discuss how DMP will be formed and run.</p> <p>Add text to clarify that DMP is not a decision making body and does not consider whether sites should be allocated for development through the Local Plan or not</p>

Rep No.	Organisation/Name	Comment	Response	Action
			<p>This can be made clearer in the draft methodology text. However, at this early stage the DMP has not yet been formed or any decision made on how it will be run. As such, it may be that each authority will hold its own separate DMP.</p> <p>In terms of involving other stakeholders as identified in the PPG, the draft methodology indicates that separate panels for each authority will be set up to involve local communities, businesses and business organisations in a similar fashion to the DMP. Such panels are likely to have less of a technical focus, but still enable discussion of the same material as the DMP and would not preclude any party from commenting on technical issues if they wish. However, it needs to be recognised that not every party representing local communities, businesses or business organisations will necessarily wish to discuss or have an in-depth understanding of the technical issues but will still wish to be involved and as such there is role for such a panel. Like the DMP a panel's role would not be to comment on the likelihood of a site being allocated or not and would be subject to a Terms of Reference with minutes of meetings placed on the Councils' websites. Again like a DMP a panel would not be a decision making group/body or committee. Runnymede has already indicated in paragraph 24 of the draft SLAA methodology that they are proposing a Community Panel to take on this role whereas</p>	

Rep No.	Organisation/Name	Comment	Response	Action
		<p>Para 43 The document should state that use of previously developed land in the Green Belt must comply with Local Plan policies as well as with the NPPF.</p> <p>We commend paras 55 - 57 on the protection of sites of nature conservation.</p> <p>Para 59 If the third runway is permitted, more people will be affected by noise, and the noise contours will change during the plan period. The methodology must allow for anticipation of this change and consideration of future noise impact, taking account the stated plans of HAL, their expected noise footprint and its probable understatement, so that subsequent revision of boundaries of development areas is possible. It's no good building houses now which will suffer unacceptable noise in 20 years time.</p>	<p>Spelthorne have indicated this would be through a Local Plan Forum. How a DMP will be run and its form will need to be discussed further between the two authorities and within each organisation in due course.</p> <p>Saved Policy GB1 of the Spelthorne Local Plan 2001 largely reflects national policy, although does not make reference to previously developed sites as these were not recognised by national policy at that time. As such, there is no Local Policy which reflects national policy in this respect.</p> <p>The same applies to the Runnymede Local Plan 2001 (2<sup>nd</sup> alteration)</p> <p>Noted.</p> <p>Noted. The SLAA can only consider the noise contours as they are now. However, the methodology can be amended to state that future iterations of the SLAA can pick up any changes to noise contours when these are made.</p>	<p>Amend paragraph 59.</p>
16	Guildford Borough Council	Thank you for consulting Guildford Borough Council with your proposed joint SLAA methodology. We have the following	Noted.	

Rep No.	Organisation/Name	Comment	Response	Action
		<p>comments to make which we hope you find helpful. In terms of our own Land Availability Assessment (LAA) which we are in the process of preparing, we have used the methodology as set out in the NPPG. Given it is sufficiently detailed, we have not undertaken any consultation on it however we will be seeking in due course to engage further with those authorities that sit within our core housing market area/functional economic area (Waverley and Woking). Our comments below are primarily based around those aspects where your proposed methodology differs from ours.</p> <p>In relation to constraints, we note you intend in the first instance to only assess sites within the urban areas or previously developed land in the Green Belt. However the NPPG states that “it is the role of the assessment to provide information on the range of sites which are available to meet need, but it is for the development plan itself to determine which of those sites are the most suitable to meet those needs.” Given (<i>Runnymede</i>) has prepared a Green Belt review which identifies nine resultant areas that have potential to be removed from the Green Belt, it is unclear why these conclusions should not inform the site analysis to identify the range of sites that may be required should you identify exceptional circumstances to amend Green Belt boundaries through your plan-making process in order to meet your identified needs.</p>	<p>Noted. Paragraph 2 of the PPG note on <i>Housing &amp; Economic Land Availability Assessment</i> identifies that plan makers choose which sites to take forward from the assessment into the plan and that para 3 advises that it is the role of the development plan itself to determine which of the sites are the most suitable. Para 9 sets out that the assessment should identify all sites and broad locations regardless of the amount of development needed and that para 11 states that sites which have particular policy constraints should be included for the sake of comprehensiveness. However para 14 states that sites should be assessed against national policies and designations and para 19 that assessing the suitability of sites should be guided by the development plan, emerging plan policy and national policy.</p> <p>As such, when assessing the suitability of sites, regard should be had to national policy. In the case of Green Belt, the vast majority of</p>	<p>Amend methodology to include sites in the Green Belt for audit purposes but make clear that these are not to be considered suitable ahead of either authority undertaking Green Belt Assessment.</p>

Rep No.	Organisation/Name	Comment	Response	Action
			<p>development and uses are inappropriate aside from a few exceptions as set out in paragraphs 89 and 90 of the NPPF one of which is the redevelopment of previously developed sites. Whilst it is agreed that in terms of comprehensiveness sites which come forward in Green Belt locations should not be excluded from the assessment, these sites will clearly be inappropriate and as such unsuitable at the time of assessment. Whilst the SLAA will need to consider whether policy constraints can be overcome, for Green Belt sites this can only be informed by a Green Belt Assessment which has not yet been undertaken in Spelthorne and completed in Runnymede. A Green Belt Assessment will be undertaken in Spelthorne in due course. To suggest a site is 'suitable' ahead of any such assessment would be premature and give a false impression of land supply. Therefore, in-depth analysis of non PDL Green Belt sites will not be undertaken ahead of any Green Belt assessment and is an approach consistent with the PPG note at paragraph 15.</p> <p>The Runnymede Green Belt review undertaken by independent consultants has identified resultant land parcels that may be suitable for inclusion in the urban area as they less effectively meet the purposes of the Green Belt than other areas. When officers assess sites submitted to the Runnymede 2015 call for sites exercise, it will be noted if these sites fall within the resultant land parcels. However, it is too</p>	

Rep No.	Organisation/Name	Comment	Response	Action
		<p>We would welcome further clarification upon the under-delivery adjustment that is proposed to be applied to the trajectory. Whilst we acknowledge that sites will not always necessarily be delivered as expected, the SLAA is an assessment at a point in time which should include a realistic assessment of each site's deliverability. This information is reviewed annually as part of SLAA updates which can then take account of changing circumstances. Para 14 NPPF states that "Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change" for which the buffer (para 47 NPPF) is used. We are unclear how the NPPF requirement for a buffer sits alongside your under-delivery calculator - we note the example used pre-dates the NPPF. We consider that a local plan should include flexibility in supply so that should sites not be delivered as planned, there are sufficient alternative sites allocated in order to ensure that the strategy remains effective.</p> <p>We note your clarification that you will assess all sites of 5 or more (net) dwellings. For information, we propose to use 5 or more (gross) dwellings.</p>	<p>early to draw any conclusions on whether or not these parcels will be removed from the Green Belt and so at this stage, officers can go no further in the site write-ups than the conclusions of the GB review.</p> <p>Noted. Paragraph 32 of the PPG note on <i>Housing &amp; Economic Land Availability Assessment</i> states that development sites for housing could include those that are allocated and sites with planning permission, unless there is clear evidence that schemes will not be implemented. However, para 25 sets out that an overall risk assessment should be made as to whether sites will come forward as anticipated. Local Plan Inspectors have in the past considered that land availability assessments should build in a degree of contingency in order to account for the fact that some sites with permission will not always come forward. As such, the under delivery adjustment is part of the risk assessment to ensure that the SLAA remains realistic about site delivery.</p> <p>Noted.</p>	
17	Keep Kempton Green	<p><b>Executive Summary</b> We welcome this opportunity to submit our comments on the Spelthorne Draft Strategic Land Availability Assessment Methodology.</p> <p>In summary, the proposed composition of the Development</p>	See comments below.	

Rep No.	Organisation/Name	Comment	Response	Action
		<p>Market Panel unfairly excludes residents, despite the requirement of the PPG that residents should be "... involved from the earliest stages of plan preparation, which includes the evidence base in relation to land availability ..."</p> <p>The Draft SLAA Methodology should be amended to include representatives of residents as full members of the Development Market Panel.</p> <p><b>1. The composition of the Development Market Panel.</b></p> <p>1.1 After our first reading of the Draft Strategic Land Availability Assessment Methodology paper (Draft SLAAM), we approached the Spelthorne Planning Department in the following terms:</p> <p>"In paragraph 19 and following paragraphs of the draft methodology there is mention of a Development Market Panel. In particular at paragraph 21:</p> <p>21. Officers at both Runnymede and Spelthorne identified a list of those who could advise on technical aspects and who would meet the requirements of the PPG to potentially sit on the DMP from their respective Local Plan consultation databases.</p> <p>Please could you tell me which particular paragraphs of the PPG are referred to in the text above?"</p> <p>1.2 Spelthorne Planning Department replied as follows:</p> <p>"Thank you for your query regarding the current consultation</p>	<p>See comments below.</p>	

Rep No.	Organisation/Name	Comment	Response	Action
		<p>of the draft methodology for a Strategic Land Availability Assessment (SLAA).</p> <p>Paragraph 21 of the draft SLAA methodology is referring to paragraph 8 of the PPG note Housing &amp; Economic Land Availability Assessments which can be found online at <a href="http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/">http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/</a></p> <p>Paragraph 8 of the PPG note lists who the Council should work with at the earliest stage of plan preparation including the evidence base in relation to land availability and includes ‘developers, those with land interests, land promoters, local property agents, local communities, partner organisations, Local Enterprise Partnerships (LEPs), business representative organisations, parish and town councils and neighbourhood forums preparing neighbourhood plans’.</p> <p>Paragraph 21 of the draft SLAA methodology identifies those groups outlined in the PPG note (as above) who could advise on the technical aspects of the SLAA through a joint Spelthorne/Runnymede Development Market Panel (DMP) such as developers, those with land interests, land promoters, local property agents. Registered providers have also been included given their particular knowledge of the affordable housing sector. Technical aspects could include viability considerations/assumptions and local market commentary/knowledge for both housing and economic development. The joint DMP will not be a forum for landowners/developers to promote their own or any particular site and this will be made very clear in a Terms of Reference which will be published on the Council’s website in due course.</p>		

Rep No.	Organisation/Name	Comment	Response	Action
		<p>As you will also have read in the draft SLAA Methodology, paragraph 24 sets out how the other groups listed in the PPG note including local communities will be involved in the SLAA process.”</p> <p>1.3 As Spelthorne Planning Department correctly states, Paragraph 8 of the PPG note “Housing &amp; Economic Land Availability Assessments” is the paragraph which is relevant as to the make-up of the Development Market Panel.</p> <p>The full text of Paragraph 8 is as follows:</p> <p>Paragraph: 008 Reference ID: 3-008-20140306</p> <p><b>Who should plan makers work with?</b></p> <p>The assessment should be undertaken and regularly reviewed working with other local planning authorities in the relevant housing market area or functional economic market area, in line with the duty to cooperate.</p> <p>The following should be involved from the earliest stages of plan preparation, which includes the evidence base in relation to land availability: developers; those with land interests; land promoters; local property agents; local communities; partner organisations; Local Enterprise Partnerships; businesses and business representative organisations; parish and town councils; neighbourhood forums preparing neighbourhood plans.</p> <p>1.4 The table below shows which stakeholders are</p>		

Rep No.	Organisation/Name	Comment	Response	Action																																	
		<p>recommended by Paragraph 8 as being</p> <p>“... involved from the earliest stages of plan preparation, which includes the evidence base in relation to land availability ...”</p> <p>as against those stakeholders which are proposed as members of the Development Market Panel and the Local Plan Forum.</p> <table border="0" data-bbox="577 619 1279 1150"> <thead> <tr> <th data-bbox="577 619 869 643">Group</th> <th data-bbox="869 619 1182 643">PPG recommends</th> <th data-bbox="1182 619 1279 643">DMP include</th> </tr> </thead> <tbody> <tr> <td data-bbox="577 651 869 675">Developers</td> <td data-bbox="869 651 1182 675">✓</td> <td data-bbox="1182 651 1279 675">✓</td> </tr> <tr> <td data-bbox="577 683 869 754">Those with land interests</td> <td data-bbox="869 683 1182 707">✓</td> <td data-bbox="1182 683 1279 707">✓</td> </tr> <tr> <td data-bbox="577 762 869 786">Land promoters</td> <td data-bbox="869 762 1182 786">✓</td> <td data-bbox="1182 762 1279 786">✓</td> </tr> <tr> <td data-bbox="577 794 869 818">Local property agents</td> <td data-bbox="869 794 1182 818">✓</td> <td data-bbox="1182 794 1279 818">✓</td> </tr> <tr> <td data-bbox="577 826 869 850">Local communities</td> <td data-bbox="869 826 1182 850">✓</td> <td data-bbox="1182 826 1279 850">X</td> </tr> <tr> <td data-bbox="577 858 869 882">Partner organisations</td> <td data-bbox="869 858 1182 882">✓</td> <td data-bbox="1182 858 1279 882">X</td> </tr> <tr> <td data-bbox="577 890 869 914">LEPs</td> <td data-bbox="869 890 1182 914">✓</td> <td data-bbox="1182 890 1279 914">X</td> </tr> <tr> <td data-bbox="577 922 869 1042">Business/ business representative organisations</td> <td data-bbox="869 922 1182 946">✓</td> <td data-bbox="1182 922 1279 946">X</td> </tr> <tr> <td data-bbox="577 1050 869 1074">Parish/Town Councils</td> <td data-bbox="869 1050 1182 1074">✓</td> <td data-bbox="1182 1050 1279 1074">na</td> </tr> <tr> <td data-bbox="577 1082 869 1150">Neighbourhood forums</td> <td data-bbox="869 1082 1182 1106">✓</td> <td data-bbox="1182 1082 1279 1106">na</td> </tr> </tbody> </table> <p>It is clear therefore that the statement in the reply we received (see 1.2 above) that:</p> <p>“the panel would include being made up of a mix of the parties as identified in the PPG”</p>	Group	PPG recommends	DMP include	Developers	✓	✓	Those with land interests	✓	✓	Land promoters	✓	✓	Local property agents	✓	✓	Local communities	✓	X	Partner organisations	✓	X	LEPs	✓	X	Business/ business representative organisations	✓	X	Parish/Town Councils	✓	na	Neighbourhood forums	✓	na	<p>The PPG note on <i>Housing and Economic Land Availability Assessments</i> states a number of groups that local authorities should involve in a land availability assessment, but does not set</p>	<p>Both authorities to discuss how DMP will be formed and run.</p>
Group	PPG recommends	DMP include																																			
Developers	✓	✓																																			
Those with land interests	✓	✓																																			
Land promoters	✓	✓																																			
Local property agents	✓	✓																																			
Local communities	✓	X																																			
Partner organisations	✓	X																																			
LEPs	✓	X																																			
Business/ business representative organisations	✓	X																																			
Parish/Town Councils	✓	na																																			
Neighbourhood forums	✓	na																																			

Rep No.	Organisation/Name	Comment	Response	Action
		<p>actually means:</p> <p>“the panel would include being made up of a mix of SOME OF the parties as identified in the PPG.”</p> <p>1.5 Spelthorne Planning Department’s reply to us goes on to say:</p> <p>“ ... paragraph 24 sets out how the other groups listed in the PPG note including local communities will be involved in the SLAA process.”</p> <p>Paragraph 24 of the Draft SLAAM says:</p> <p>“Runnymede Borough Council is also proposing to set up a Community Panel and the Spelthorne Statement of Community Involvement (SCI) proposes a Local Plan Forum. These will include groups identified through the PPG as follows: local communities; partner organisations; Local Enterprise Partnerships; businesses and business representative organisations; parish and town councils; neighbourhood forums preparing neighbourhood plans (where applicable). A number of documents in relation to each Local Plan may be considered by these panels, including the SLAA.”</p> <p>So, what the Draft SLAAM proposes that is that SOME of the stakeholders set out in Paragraph 8 of the PPG note (developers, those with land Interests, land promoters, land property agents) will sit on the Development Market Panel, while all other stakeholders will be sidelined to be part of the Local Plan Forum.</p>	<p>out how such groups should be involved. Paragraph 21 of the draft SLAA methodology sets out the concept of forming a Development Market Panel to advise both Councils on technical aspects of the SLAA such as on viability assumptions and provide market commentary. This would be for both residential (including Gypsies and Travellers) and economic development. The Panel is proposed to be formed from those parties listed in the PPG note on Housing &amp; Economic Land Availability Assessments that hold industry/market knowledge such as developers, local property agents and registered providers and can advise on such technical issues. The Panel will not however, be an opportunity for any one party to promote a particular site or to attempt to gain an advantage or influence the Local Plan process. This will be made very clear in a Terms of Reference for the Panel which will be placed on the Council’s website along with any minutes arising from Panel meetings. Further, the Panel is only to advise on technical aspects, it is not a decision making group/body or a committee and will not consider whether sites should be given development status or not. Such decisions will be a matter for the Local Plan supported by a Sustainability Appraisal. This can be made clearer in the draft methodology text. However, at this early stage the DMP has not yet been formed or any decision made on how it will be run. As such, it may be that each authority will hold its own</p>	<p>Add text to clarify that DMP is not a decision making body and does not consider whether sites should be allocated for development through the Local Plan or not.</p>

Rep No.	Organisation/Name	Comment	Response	Action
		<p>These are, according to the legal advice we have taken, not equivalent roles. The Development Market Panel will decide on crucial issues regarding the SLAA, while the Local Plan Forum, especially given our experience of the previous Local Plan Forum held in connection with the SHMA, is merely a talking shop.</p> <p>It is unacceptable, from the point of view of the residents of Spelthorne, that they should be excluded from the Development Market Panel. The views of residents should be allowed to be heard in a vital committee which will decide whether particular parcels of land will be given development status or not.</p> <p>Paragraph 8 of the relevant PPG note specifically says they should be included, "from the earliest stages". At the very least there is nothing in any of the sections of the "Housing &amp; Economic Land Availability Assessments" PPG note which says that residents should not be included on the Development Market Panel.</p> <p>More broadly, residents also have a right to be included on the Development Market Panel in terms of the principles of natural justice as outlined at length from the Supreme Court judgement and associated legal opinion set out in the KKG response to the Spelthorne Draft Statement of Community Involvement, which is a matter of public record and which is too lengthy to reproduce here.</p> <p>1.6 Spelthorne Planning Department's reply to us also says:</p> <p>"The joint DMP will not be a forum for landowners/developers</p>	<p>separate DMP.</p> <p>In terms of involving other stakeholders as identified in the PPG, the draft methodology indicates that separate panels for each authority will be set up to involve local communities, businesses and business organisations in a similar fashion to the DMP. Such panels are likely to have less of a technical focus, but still enable discussion of the same material as the DMP and would not preclude any party from commenting on technical issues if they wish. However, it needs to be recognised that not every party representing local communities, businesses or business organisations will necessarily wish to discuss or have an in-depth understanding of the technical issues but will still wish to be involved and as such there is role for such a panel. Like the DMP a panel's role would not be to comment on the likelihood of a site being allocated or not and would be subject to a Terms of Reference with minutes of meetings placed on the Councils' websites. Again like a DMP a panel would not be a decision making group/body or committee. Runnymede has already indicated in paragraph 24 of the draft SLAA methodology that they are proposing a Community Panel to take on this role whereas Spelthorne have indicated this would be through a Local Plan Forum. How a DMP will be run and its form will need to be discussed further between the two authorities and within each organisation in due course.</p>	

Rep No.	Organisation/Name	Comment	Response	Action
		<p>to promote their own or any particular site and this will be made very clear in a Terms of Reference which will be published on the Council's website in due course."</p> <p>We look forward to reading the Terms of Reference for the Development Market Panel. We assume from the sentence immediately above that they will include a provision disallowing developers, those with land Interests, land promoters, and land property agents from expressing views on the development status of any parcel of land in which they have a direct influence.</p> <p>But even if such a provision is included in the Terms of Reference of the Development Market Panel, we are strongly unconvinced that the Panel, constituted as proposed by the draft SLAAM, will be able to come to any objective conclusions as to the development status of any particular parcel of land within the Borough. To claim otherwise is to ignore the following:</p> <ul style="list-style-type: none"> <li>* the inbuilt bias which developers, those with land Interests, land promoters, and land property agents will have towards allowing development status for ANY parcel of land, regardless of whether they have a direct interest in it or not. This is a fact of life – one would not expect anything other than such a bias in anyone whose business is the development of land. By arguing for allowing development status for Parcel A (in which the developer, etc does not have an interest) they lay the way open of such development status, if granted, to create a legal precedent for Parcel B (in which they do have a direct interest).</li> <li>* The possibility of collusion between developers, those with</li> </ul>		

Rep No.	Organisation/Name	Comment	Response	Action
		<p>land interests, land promoters, and land property agents who do not have a direct interest in a particular parcel of land, and those who do have such an interest in that particular parcel of land.</p> <p>1.7 It might be argued that residents are technically unqualified to sit on the Development Market Panel. Indeed, Paragraph 21 of the Draft SLAAM explicitly says:</p> <p>“The panel will also consist of representatives who have the knowledge/experience to comment on the draft methodology/sites that are proposed for economic development in terms of their viability.”</p> <p>It would be a very mistaken conclusion to draw that there is no-one amongst the various resident groups on Spelthorne who is capable of expressing an informed opinion on the “draft methodology/sites that are proposed for economic development”.</p> <p>There are a number of people who we know of (and there are certainly bound to be others which we do not know directly of) who come from this planning and development area of business life (and who come from other relevant disciplines and have other relevant experience) who are eminently qualified to sit on the Development Market Panel. In any case, membership of the Panel should not be limited by such a requirement for technical experience (as explained fully in the Supreme Court judgement and associated legal opinion referred to previously in 1.5 above), and as also set out in Paragraph 8 of the PPG note Housing &amp; Economic Land Availability Assessments .</p>		

Rep No.	Organisation/Name	Comment	Response	Action
18	Surrey County Council (Heritage)	<p>I have no significant concerns about the methodology: there is little of heritage note, and I would not expect a major contribution to be necessary at the stage of the process this document represents.</p> <p>However, I would expect heritage to form a material consideration in the selection of individual sites later in the process: the presence of Scheduled Monuments, Listed Buildings, Registered Parks, Conservation Areas, County Sites of Archaeological Importance and Areas of High Archaeological Potential will be of serious concern as and when sites are proposed. It should also be noted that according to the Spelthorne and Runnymede Local Plans, any sites over 0.4ha in size will also require screening for possible archaeological material prior to development: I'd expect that this information would be borne in mind by the relevant Officers compiling the SLAA, and communicated to any subsequent applicants.</p>	<p>Noted.</p> <p>Noted.</p>	
19	Quod	<p>We are pleased to have the opportunity to make representations on the draft Strategic Land Availability Assessment (SLAA) Methodology. We are concerned that the draft is inconsistent with national policy and guidance.</p> <p>We represent a variety of land owners and developers, including those with an interest in Spelthorne. In August of this year we submitted representations to the draft Strategic Housing Market Assessment (SHMA) for Runnymede and Spelthorne Councils, setting out our view that the draft SHMA significantly underestimated the extent of objectively assessed need and required significant revision if it was to be considered a sound basis on which to take forward the local plans. We have similar concerns in relation to the draft SHLA.</p>	<p>Noted.</p>	

Rep No.	Organisation/Name	Comment	Response	Action
		<p>As the Council approaches the preparation of its Local Plan, it is important that it does so consistently with the expectation of the NPPF which seeks to encourage rather than act as an impediment to sustainable growth (paragraph 19). Consistent with the NPPF and with the more recent Productivity Plan, national policy expects housing, employment and infrastructure needs to be identified and planned for.</p> <p>Even based on the draft SHMA, objective housing needs are at least 4 times greater than the annual requirement which forms the basis of the current (<i>Spelthorne</i>) Core Strategy. The emerging evidence base also identifies a need for additional employment development in response to the NPPF but also to counter the increasing trend towards out commuting from the Borough.</p> <p>Against this background, it is important that the key building blocks of the Local Plan such as the SHMA and the SLAA are positively prepared consistently with national policy.</p> <p>We are particularly concerned that the approach proposed in the draft Methodology to Green Belt boundaries. Green Belt comprises 65% of Spelthorne Borough and development needs will not be addressed if Green Belt is regarded as an absolute constraint.</p> <p>Contrary to national policy and guidance, the draft Methodology seeks to pre-judge the approach which the local plan needs to take to Green Belt issues. In particular, paragraphs 41–43 propose that the development potential of Green Belt land is only examined where development might amount to limited infilling or re-development of previously</p>	<p>Noted, however paragraph 14 of the NPPF states that whilst Local Plans should meet objectively assessed needs, this is subject to any adverse impacts outweighing the benefits and where specific policies in the Framework indicate development should be restricted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted. Paragraph 2 of the PPG note on Housing &amp; Economic Land Availability Assessment identifies that plan makers choose which sites to take forward from the assessment into the plan and that para 3 advises that it is the role of the development plan itself to determine which of the sites are the most suitable. Para 9 sets out that the assessment should identify all sites and broad locations regardless of the amount of development needed and that para 11 states that sites which have particular policy constraints should be included for the sake of</p>	<p>Amend methodology to include sites in the Green Belt for audit purposes but make clear that these are not to be considered suitable ahead of either authority</p>

Rep No.	Organisation/Name	Comment	Response	Action
		<p>developed land within the Green Belt. Here and at paragraph 97, the draft makes clear that Green Belt is otherwise to be treated as an absolute constraint.</p> <p>a) Conflict with the NPPF As the draft Methodology states, the extent of Green Belt can be amended through the adoption of a local plan, in accordance with paragraph 83 of the NPPF (draft SLAA para 42). In fact, the relevant guidance is contained in NPPF paragraphs 83-85. In particular:</p> <ul style="list-style-type: none"> <li>• paragraph 84 advises that “when drawing up or reviewing Green Belt boundaries, local authorities should take account of the need to promote sustainable patterns of development”; and</li> <li>• paragraph 85 provides “when defining boundaries, local planning authorities should ensure consistency with the local plan’s strategy to meeting identified requirements for sustainable development.”</li> </ul> <p>In other words, it is appropriate and necessary when preparing the Local Plan to review Green Belt boundaries having regard to the requirements for sustainable development. The SLAA, of course, is to be prepared to inform the Local Plan review, it would be entirely contrary to the NPPF and self-defeating if the SLAA were to treat the Green Belt boundaries established in the last local plan as an absolute constraint.</p> <p>The need to review Green Belt boundaries as part of the review of the development plan was a requirement of previous Green Belt policy set out in PPG 2 and has consistently been recognised by local plan Inspectors.</p>	<p>comprehensiveness. However para 14 states that sites should be assessed against national policies and designations and para 19 that assessing the suitability of sites should be guided by the development plan, emerging plan policy and national policy.</p> <p>As such, when assessing the suitability of sites, regard should be had to national policy. In the case of Green Belt, the vast majority of development and uses are inappropriate aside from a few exceptions as set out in paragraphs 89 and 90 of the NPPF one of which is the redevelopment of previously developed sites. Whilst it is agreed that in terms of comprehensiveness sites which come forward in Green Belt locations should not be excluded from the assessment, these sites will clearly be inappropriate and as such unsuitable at the time of assessment. Whilst the SLAA will need to consider whether policy constraints can be overcome, for Green Belt sites this can only be informed by a Green Belt Assessment which has not yet been undertaken in Spelthorne and completed in Runnymede. To suggest a site is ‘suitable’ ahead of any such assessment would be premature and give a false impression of land supply. Therefore, in-depth analysis of non PDL Green Belt sites will not be undertaken ahead of any Green Belt assessment and is an approach consistent with the PPG note at paragraph 15.</p>	<p>undertaking Green Belt Assessment.</p>

Rep No.	Organisation/Name	Comment	Response	Action
		<p>The preparation of the Spelthorne Core Strategy and Policies DPD serves as a case in point. In particular:-</p> <p>i. the DPD was prepared against the background of previous regional planning guidance which made clear that where housing needs could not be met within the urban area this could amount to an exceptional circumstance warranting a review of the Green Belt (Inspector's Report paragraph 3.18);</p> <p>ii. whilst a Green Belt review was not carried out as part of the DPD, this was because the regional housing allocation could be met within Spelthorne's built up area without a Green Belt review (Inspector's Report paragraph 3.19);</p> <p>iii. a Green Belt review would be necessary if work had shown that development needs could not be met outside the Green Belt within Flood Zones 2 and 3 (Inspector's Report paragraph 3.28); and</p> <p>iv. consequently, the Inspector concluded at paragraph 3.37:</p> <p><b>“The exceptional circumstances necessary to justify altering Green Belt boundaries would only exist if it was not possible to identify sufficient land to meet development requirements outside the Metropolitan Green Belt.”</b></p> <p>Applying this approach to the up to date planning circumstances in Spelthorne consistent with the NPPF would require a recognition of the following:-</p> <ul style="list-style-type: none"> <li>• there is no prospect of meeting objectively assessed needs</li> </ul>		

Rep No.	Organisation/Name	Comment	Response	Action
		<p>in Spelthorne without reviewing Green Belt boundaries; and</p> <ul style="list-style-type: none"> <li>• the Local Plan is the appropriate place in which to undertake that review.</li> </ul> <p>Green Belt boundaries are intended to endure for the long term but planning policy does not fix them as permanent and they are to be re-examined through the local plan process. In Spelthorne, Green Belt boundaries have not been revised since xxxx and a review of Green Belt boundaries in the forthcoming Local Plan would fix those boundaries until 2031. The review would be consistent, therefore, with the requirement for boundaries to be infrequently reviewed but to endure for the longer term.</p> <p>b) Conflict with the NPPG  Planning Practice Guidance sets out the most up to date guidance on the implementation of national policy, for example, in relation to the preparation of a SLAA. The Guidance is entirely clear that it would be self-defeating to approach a local plan review on the basis that existing constraints will not change. In particular:-</p> <ul style="list-style-type: none"> <li>i. the approach is to ensure that all the land is assessed (reference ID:3-001-20140306);</li> <li>ii. plan makers are required to plan proactively to meet objectively assessed needs (ID:3-002-20140306);</li> <li>iii. it is the role of the assessment to provide information on the range of sites which are available to meet needs, but it is for the development plan itself to determine which of these sites are the most suitable to meet those needs (ID:3-004-20140306);</li> </ul>		

Rep No.	Organisation/Name	Comment	Response	Action
		<p>iv. the assessment should identify all sites and broad locations regardless of the amount of development needed, to provide an audit of available land (ID:3-010-20140306);</p> <p>v. when carrying out a desktop review, plan makers should be proactive in identifying as wide a range as possible of sites and broad locations for development. Sites which have particular policy constraints, should be included in the assessment for the sake of comprehensiveness but these constraints must be set out clearly, including where they severely restrict development. An important part of the desktop review, however, is to test again the appropriateness of other previously defined constraints, rather than simply to accept them (ID:3-012-20140306);</p> <p>vi. plan makers will need to take account of how up to date the plan policies are and consider the appropriateness of identified constraints on site/broad locations and whether such constraints can be overcome (ID:3-020-20140306);</p> <p>vii. where constraints have been identified, the assessment should consider what action would be needed to remove them (along with when and how this could be undertaken and the likelihood of sites/broad locations being delivered). Actions might include the need for investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy which is currently constraining development (ID:3-023-20140306).</p> <p>If the SLAA methodology is not adjusted to reflect these</p>		

Rep No.	Organisation/Name	Comment	Response	Action
		<p>requirements, there is every prospect that it will not provide an adequate basis for a sound local plan.</p> <p>Given the significance of these issues we would be pleased to engage with you further around the approach to be taken.</p>		
20	Surrey County Council	<p>Thank you for consulting Surrey County Council on the Runnymede &amp; Spelthorne Borough Councils joint draft Strategic Land Availability Assessment Methodology. We have comments to make on minerals and waste issues. These are as follows:</p> <p>Paras 52-53 Re the section on 'Waste and Minerals Sites': this could usefully be extended to refer to paragraph 8 of the National Planning Policy for Waste (NPPW) which states: "When determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that the likely impact of proposed, non-waste related development on existing waste management facilities, and on sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities...".</p> <p>This section could also refer to Surrey Minerals Plan Core Strategy 2011 Policy MC6 (Safeguarding Mineral Resources and Development) and Surrey Waste Plan 2008 Policy DC1 (Safeguarding Sites). Together, these policies explain the local context for defining mineral safeguarding areas; safeguarding both allocated and existing sites for minerals and waste development; and safeguarding infrastructure used for minerals development.</p>	<p>Noted. Additional text referring to the NPPW will be added.</p> <p>Noted. Reference to relevant minerals policies will be added.</p>	<p>Add text.</p> <p>Add text.</p>



Rep No.	Organisation/Name	Comment	Response	Action
		<p>(SSSI)</p> <p>Please note that the Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on “Development in or likely to affect a Site of Special Scientific Interest” (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website.</p>	Noted.	
22	Environment Agency	<p>We are pleased to see that the proposed methodology indicates it will give regard to the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG).</p> <p>Flooding</p> <p>We are pleased to see that flooding has been included as a constraint and included within paragraphs 44 to 48. Paragraph 45 notes when we should be consulted when a site is within flood zones 2 and 3, it may be beneficial to also note that we should be consulted when a site is within 20 metres of a main river. We are concerned to note from paragraphs 46 and 96 that development sites within flood zone 3a will not be discounted, we are however, pleased to note that it is made clear that the sequential test will need to be passed for this to be acceptable in accordance with table 3 of the NPPG. We are pleased to note that if a strategic sequential test has not been completed by the local authority, individual planning applications will need to demonstrate this.</p>	<p>Noted.</p> <p>Noted. Text to be updated to confirm EA consultation criteria. Whilst the comments with respect to paragraphs 46 and 96 are noted, the approach to development in flood zones is considered to follow national policy.</p>	Update para 45

Rep No.	Organisation/Name	Comment	Response	Action
		<p>River Thames Scheme</p> <p>We are also pleased to see that the River Thames Scheme has been included as a constraint. The scheme will reduce flood risk in communities close to the River Thames between Datchet and Shepperton, including Wraysbury, Egham, Staines and Chertsey. It consists of large scale engineering work to construct a flood channel in three sections, between 30 and 60 metres wide, to a total length of 17 kilometres; improvements to three of the existing weirs and the widening of the Desborough Cut. The scheme also includes the installation of property level products for up to 1,600 homes and improved flood incident response plans. Please contact: <a href="mailto:rts@environment-agency.gov.uk">rts@environment-agency.gov.uk</a> for further information.</p> <p>Foul water</p> <p>We note that the SHLAA methodology does not consider how any capacity issues with Sewage Treatment Works (STWs) and/or the sewerage network will be addressed. We recommend that you seek assurance from Thames Water regarding existing and future sewerage network capacity in the areas where growth is proposed. Although in isolation proposed developments may not be a significant burden on the network, the cumulative impact of all development and other approved schemes in each of the STW catchment areas should be considered. Failures in network capacity can lead to pollution incidents that may result in human health and water quality issues. Paragraph 109 of the NPPF requires Local Councils to consider the impacts proposed development will have on water quality. The European Water Framework Directive (WFD) requires that there be no deterioration in water quality of surface or groundwater</p>	<p>Noted.</p> <p>The SLAA does not consider which sites should be allocated for development but is an audit of sites with development potential. Whilst constraints regarding sewer capacity will be taken into account during the appraisal of sites in the SLAA where these are known, any dialogue regarding sewer infrastructure capacity will be undertaken with Thames Water as part of the Local Plan process.</p>	<p>None</p>

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		<p>bodies and that all waterbodies reach at least 'good' status by 2027.</p> <p>Biodiversity</p> <p>We note paragraphs 55 to 57 regarding Sites of International and National Nature Conservation Importance; however, we would also expect to see a minimum 8 metre wide buffer zone surrounding all main rivers. This is the minimum buffer zone we require to main rivers for both biodiversity reasons and in order to gain access for maintenance purposes. These buffer zones should be without structures, hard standing (including car parks), formal footpaths, fences or overhanging development such as balconies and should not include formal landscaping.</p> <p>Buffer zones are required for a number of reasons, including preventing the overshadowing of watercourses by buildings, which inhibit plant growth and hence reduce the habitat potential within the channel and on the banks.</p> <p>Paragraph 109 of the NPPF, recognises that the planning system should aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. Article 10 of the Habitats Directive stresses the importance of natural networks of linked habitat corridors to allow the movement of species between suitable habitats, and promote the expansion of biodiversity. Rivers are particularly effective in this way when</p>	<p>Noted. Text can be added regarding the 8m buffer.</p>	<p>Update paras 55-57</p>

Rep No.	Organisation/Name	Comment	Response	Action
		<p>they have a buffer zone surrounding them.</p> <p>The Natural Environment and Rural Communities Act requires Local Authorities to have regard to nature conservation and article 10 of the Habitats Directive which stresses the importance of natural networks of linked corridors to allow movement of species between suitable habitats, and promote the expansion of biodiversity.</p> <p>Final comments</p> <p>We trust that the information in this letter will be of benefit to you. If we can be of any assistance during this process or if you have any queries please feel free to contact me. We look forward to receiving formal consultation from you when the draft SHLAA is published. I once again apologise for the delay in our response.</p>		