

Spelthorne Borough Council

**Green Belt Assessment (Stage 1) Consultation on Draft
Methodology**

Table of Comments and Council Response

March 2017



Introduction

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

Table of Comments and Officer Responses- Green Belt Assessment (Stage 1) Draft Methodology

Comment Ref No	Verbatim Comment	Summarised Comment	SBC Response
01805/3/001	<p>Highways England</p> <p>Our interest in such Strategy documents is specifically focussed on the council's approach to highway and transport matters in relation to regeneration and new development. We are keen to understand how local authorities initially identify and prioritise transport improvements in order to deliver sustainable development. Specifically how local authorities set and implement policy to manage trip demands and ultimately how these might affect the safe and efficient operation of the Strategic Road Network for which we are responsible. Highways England will be concerned that the cumulative effect of development proposals have the potential to impact on the safe and efficient operation of the SRN, in this case the M25 J13 and 14, M3 J1, the A30, A316 and the A3113 all of which are either adjacent to or within the councils boundary.</p> <p>It is noted and welcomed that the council are intending to take an active approach to sustainable public transport to better manage demand on the highway network for the movement of people and goods. This approach is preferred against the initial building of new infrastructure which should be viewed as a final resort. It was interesting to note that a substantial proportion of the boroughs working populous commute out for work and are clearly drawn to neighbouring London Boroughs of Hillingdon and Hounslow due to the employment linked with Heathrow. The councils desire to strengthen the public transport links between itself and Heathrow is appropriate as this is likely to reduce the dependence on car travel which is currently the Boroughs primary means of transport with overall car ownership likely to remain high. Strengthening public transport links between Heathrow and Spelthorne could become essential should a third runway at Heathrow proceed which at present seems likely.</p> <p>However, even with a heavy emphasis on public transport initiatives there is still the potential for residual adverse impacts on the highway network. Therefore, the council will need to provide sufficient evidence to demonstrate that its proposals have no residual severe impacts on the operation of the SRN or provide highway proposals to mitigate such impacts to an acceptable level.</p>	<p>1. Highways England</p> <p>1.1 Focus on the council's approach to highway and transport matters.</p> <p>1.2 Keen to understand how local authorities initially identify and prioritise transport improvements in order to deliver sustainable development</p> <p>1.3 Interest in how local authorities set and implement policy to manage trip demands and how these may affect safe and efficient operation of the SRN</p> <p>1.4 Note that the council intend to take an active approach to sustainable public transport. This approach is preferred to the building of new infrastructure</p> <p>1.5 It is considered appropriate that the council desires to strengthen public transport links between the Borough and Heathrow</p> <p>1.6 Even with heavy emphasis on public transport initiatives there is still the potential for residual adverse impacts on the highway network. The council therefore needs to provide evidence that its proposals have no residual severe impacts on the operation of the SRN.</p>	<p>The purpose of the Green Belt Assessment is to consider how the Green Belt performs against the 5 purposes set out in the NPPF. This evidence will then be taken into account by the Council alongside other evidence in preparing its Local Plan.</p> <p>The representation deals with general transport planning points and makes no comment specifically on the Green Belt Methodology.</p> <p>No changes to be made.</p>

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00019/4/001	<p>LB Richmond</p> <p>This study does not seek to identify any sites to be released for development, only whether the Green Belt fulfils the purposes as defined in the NPPF. As such, we have no comments to make at this stage on the methodology.</p> <p>We noticed a typographic error on page 9, para 3.1.2 “Strategy” should read “Strategic Housing Land Availability Assessment”.</p> <p>In Appendix C, an update is required on page C5 with regard to the LB Richmond upon Thames Local Plan. “The Council is preparing the final version of the Local Plan for Publication consultation to take place from around mid-December 2016 onwards, and it is anticipated that the Local Plan will be adopted by Spring 2018. As part of the ... “</p>	<p>2. LB Richmond</p> <p>2.1 The study only seeks to identify whether the Green Belt fulfils the purposes as defined in the NPPF, as such we have no comments to make.</p> <p>2.2 Typographic error page 9, para 3.1.2 “strategy” should read “Strategic Housing Land Availability Assessment”</p> <p>2.3 In Appendix C, an update is required on page C5 with regard to the LB Richmond upon Thames Local Plan “ The Council is preparing the final version of the Local Plan for Publication consultation to take place from around mid-December 2016 onwards, and it is anticipated that the Local Plan will be adopted by Spring 2018. As part of the ...”</p>	<p>Note no comments on the methodology.</p> <p>Agree to the following factual changes:</p> <p>2.2- Text to be corrected to ‘Strategic Housing Land Availability Assessment’ at para 3.1.2 on pg. 9.</p> <p>2.3- Appendix C to be updated to take account of LB Richmond Local Plan progress.</p>
01847/1/001	<p><i>Savills on behalf of London Diocesan Fund</i></p> <p>The Green Belt Review is necessary to enable the Council to identify sufficient land to meet its future housing requirement and other development needs and has not been undertaken since the preparation of the 2001 Local Plan. The Borough is at risk of unsustainable development if the Council fails to identify sufficient land to meet its housing requirement. The purpose of the Stage 1 Assessment is to provide an independent objective appraisal of Green Belt within Spelthorne’s administrative area and confirm whether it meets the purposes of the Green Belt as defined by the NPPF. The Methodology sets out how this will be achieved. This submission relates to the LDF’s landholdings east of Upper Halliford Road, Upper Halliford. The land is considered to contribute least towards the five Green Belt purposes displaying strong urban influences as a result of being enclosed by the A244 (Upper Halliford Road), Nursery Road, the Bishop Wand Secondary School and surrounding residential. The location is situated on the edge of the historic Green Belt periphery with defined boundaries and its release from the designation would not materially affect Spelthorne’s Green Belt from performing its five functions; in fact removal of its inconsistency would provide a more defined boundary of the Green Belt at this location given in particular the A244 containing the site to the west. At the appropriate time, the LDF will be submitting formal representations promoting this site as an appropriate and suitable Green Belt land release for consideration under Arup’s stage 1 Green Belt Review when published early next year and these site specific arguments will be set out at that time.</p>	<p>3. Savills on behalf of London Diocesan Fund</p> <p>3.1 LDF supports the principles of the stage 1 methodology. The representation then seeks to emphasise the national guidance that underpins it. It also makes comment on issues to be considered in deciding whether Green Belt land should be released.</p> <p>It finally seeks to promote a site for release in Sunbury.</p>	<p>The representation supports the methodology on this stage 1 study.</p> <p>Comments on further considerations for releasing Green Belt land and the merits of their client’s site are not relevant to the document being consulted on.</p> <p>No changes to be made.</p>

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	<p>Green Belt Policy</p> <p>The LDF note that, as stated in the brief, <i>“there has been no significant change to the extent of the Spelthorne Green Belt since 1956”</i> (page 6). Significant development has occurred in Spelthorne over the past 60 years without significant changes to Green Belt boundaries, including the adoption of four Local Plans (1965, 1974, 1991 and 2001). In preparation of the emerging Local Plan, The LDF considers that appropriate areas of Green Belt should be released where they no longer perform a Green Belt function.</p> <p>Paragraphs 79 to 92 of the National Planning Policy Framework (NPPF) (March 2012) set out a clear basis for the Government’s approach to the Green Belt as SBC correctly acknowledge within the brief. Specifically, paragraph 80 states the five Green Belt “tests” as follows: <i>“Green Belt serves five purposes:</i></p> <ul style="list-style-type: none"> • <i>to check the unrestricted sprawl of large built-up areas;</i> • <i>to prevent neighbouring towns merging into one another;</i> • <i>to assist in safeguarding the countryside from encroachment;</i> • <i>to preserve the setting and special character of historic towns;</i> <p><i>and</i></p> <ul style="list-style-type: none"> • <i>to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”</i> <p>Paragraph 83 states that: <i>“Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.”</i></p> <p>Paragraph 84 states that: <i>“When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development.”</i></p> <p>Paragraph 85 states that: <i>“When defining boundaries, local planning authorities should:</i></p> <ul style="list-style-type: none"> • <i>ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;</i> • <i>not include land which it is unnecessary to keep permanently open;</i> • <i>satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and</i> • <i>define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”</i> 		

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	<p>NPPF (paragraph 47) sets out a requirement “to boost significantly the supply of housing.” The Council have just launched their Call for Sites process which together with the SHMA (2015) will inform housing target requirements to result in an increase in housing supply significantly over historic levels.</p> <p>The SHMA (published November 2015) identifies that significant housing pressures exist within the district evident through the requirement of 757 homes per annum based on the latest population projections published May 2014 for the plan period to 2033.</p> <p>Full, objectively assessed housing need is required to be identified and met first (reference to NPPG paragraph 45, in particular); and then only after this does an Authority consider Green Belt constraints but in the context of meeting housing shortage and forecasted housing need and demand. The LDF therefore supports the Statement’s recognition that an exceptional case can be developed on the basis of the “<i>acuteness/ intensity of the housing need.</i>”</p> <p>It is important to stress that the NPPG (paragraph 44) indicates that the Green Belt Boundaries are intended to be altered in exceptional circumstances (such circumstances being a critical housing need) through the preparation or review of a Local Plan. It is therefore important that SBC undertake a robust and comprehensive Green Belt boundaries review in considering Green Belt land as an important potential housing land supply source.</p> <p>The Brief sets out within Section 4 the Methodology to be used for undertaking the Spelthorne Green Belt Assessment. The LDF is in support of the scope of the assessment to “<i>consider all Green Belt land as defined in the current adopted Local Plan</i>” (author’s emphasis). It is noted that the assessment considers both strategic and local reviews.</p> <p>Other Criteria Beyond the NPPF Green Belt Tests The statement includes reference to other planning considerations in assessing land under this Green Belt review – to include “<i>landscape quality.</i>” We agree with the brief that landscape quality is not a reason for allocating land within the Green Belt. It has no relation with the value and function of the Green Belt and is not referenced within NPPF Green Belt policy. The LDF strongly urge that this criteria is excluded from any</p>		

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	<p>reference within the review and instead continues to concentrate on the five, key Green Belt tests set out in the NPPF (as expressed above). This will then ensure that the recommendations of the Green Belt Study from both stage 1 and 2 are justified and sound.</p> <p>Strategic Area B The brief acknowledges that the functions within this Strategic Area “<i>vary significantly</i>” further stating that “<i>distant views are often contained by surrounding settlements and large infrastructure, including major roads and railway lines which punctuate the area.</i>”</p> <p>The Green Belt Assessment It is clear that the five NPPF Green Belt Purpose tests (paragraph 80) should be the principle criteria for considering Green Belt land release as part of the Stage 1 Study process. Accordingly, each of the Local Areas (and all land within them) within the Stage 1 Study should be assessed independently against each of the five Green Belt Purpose tests individually to ensure a robust approach.</p> <p>Given that these Purposes are the key focus, it follows that if all land within a Local Area is found to make a negligible contribution towards the five Green Belt Purpose tests, then all such land should be recommended for release to assist in meeting pressing current and future development needs. There should be no cap or limit on the amount of Green Belt that should be released where the five tests are not met and where the critical mass of development to meet housing needs is also given some consideration.</p> <p>Paragraph 84 of NPPF Green Belt policy states that when drawing up or reviewing boundaries, local authorities should “<i>take account of the need to promote sustainable patterns of development.</i>” The NPPF (paragraph 7) defines sustainable development as including “<i>providing the supply of housing required to meet the needs of present and future generations.</i>” Accordingly, in order for the emerging Single Local Plan to be considered sound, it will be necessary for SBC to consider the recommendations of the Green Belt Assessment in conjunction with the Strategic Housing Market Assessment (SHMA) and the Strategic Housing Land Availability Assessment (SHLAA) to ensure that sufficient Green Belt land is released in the right market locations to meet housing needs of present and future generations.</p>		

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	<p>It is acknowledged within the brief that “any potential alterations to the Green Belt must be based on a new permanent and defensible boundary, thus, permanent man-made or natural features” (page 25) which is in line with NPPF policy on the review of Green Belt boundaries. It is also considered that in accordance with NPPF paragraph 83, such boundaries should be capable of enduring beyond the plan period.</p> <p>Conclusion The LDF supports the key principles of the Green Belt Assessment (Stage 1) Methodology and does not wish to discourage the Assessment’s progression. However, it is requested that the above considerations are given due weight in the undertaking of the assessment itself.</p> <p>It is clear that a comprehensive Green Belt Review has not resulted in significant alterations to the boundary for in excess of 60 years and that significant housing pressures exist within the district which is identified through the SHMA 2015 as a requirement of 757 homes per annum (to 2037) based on the latest population projections published May 2014.</p> <p>Providing the supply of housing required to meet the needs of present and future generations in the right market locations is a crucial element of promoting patterns of sustainable development (NPPF paragraph 89) and should be a consideration as part of the Methodology in redrawing Green Belt boundaries. As part of this boundary review, a full and comprehensive consideration must be given to endurance of those boundaries beyond the Plan Period (in the context of meeting short, medium and longer term housing needs).</p>		
00025/4/001	<p>Runnymede Borough Council We note that Spelthorne have engaged Arup to carry out this Assessment. RBC engaged Arup to carry out a Green Belt Review and it is welcomed that the methodology for the two reviews is largely the same, albeit with slightly different scopes and refinements.</p> <p>At this stage, we would make the following comments:</p> <p>(i) Table 3.1: The Runnymede Green Belt Review comprised two phases, culminating in the identification of Resultant Land Parcels. (ii) Table 4.2: It is noted that Egham has been included as part of a large built-up area in Spelthorne, with Chertsey identified as</p>	<p>4. Runnymede Borough Council 4.1 It is welcomed that the methodology for both Spelthorne and Runnymede’s reviews is largely the same (both engaged Arup), albeit with slightly different scopes and refinements. 4.2 Table 3.1: The Runnymede Green Belt Review comprised two phases, culminating in the identification of Resultant Land Parcels. 4.3 Table 4.2: It is noted that Egham has been included as part of the large built-up area which includes Staines-upon-Thames, with Chertsey identified as a large built-up area in a neighbouring authority. Whilst the logic of including Egham with Staines-upon-Thames can</p>	<p>4.1- Support noted. 4.2- Table 3.1 to be updated to take account of the identification of land parcels by Runnymede. 4.3- Figure 4.2 already notes that Egham is in Runnymede therefore it is not considered necessary to make a change. 4.4- Figure 4.2 relates to large built up areas to be considered under Purpose 1 (to check unrestricted sprawl of large built up areas). Staines and Egham are considered to functionally form one continuous</p>

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	<p>a large built-up area in a neighbouring authority. Whilst the logic of including Egham with Staines-upon-Thames can be understood in terms of the two towns forming one large built up area, Egham isn't in Spelthorne and so this should be clarified in the table.</p> <p>(iii) With reference to the above point, Table 4.4 identifies Egham as a settlement in a neighbouring local authority. This table refers to Purpose 2, relating to the merging of towns. The two tables therefore would appear to not be compatible with regard to the status of Egham.</p> <p>(iv) In Appendix C, the Local Plan Status for Runnymede could be updated to 'recently completed Reg 18 Consultation'. In the Conclusions column, the information could more accurately say that Phase 2 assessed all the GAs against potential constraints.</p> <p>(v) The Runnymede entry in the table in Appendix C could for completeness also include a reference to the Runnymede Green Belt Villages Review undertaken by the Council to consider whether villages lying in the Green Belt should continue to be 'washed over' (included) by the Green Belt or excluded and returned to the settlement.</p> <p>We reserve the right to make additional comments on the assessment as a part of further Duty to Co-operate engagement, including when the General Areas for study are determined and assessed.</p>	<p>be understood in terms of the two towns forming one large built up area, Egham isn't in Spelthorne and so this should be clarified in the table.</p> <p>4.4 Table 4.4 (with reference to table 4.2) identifies Egham as a settlement in a neighbouring local authority, referring to Purpose 2 (merging towns). The two tables would appear to not be compatible with regard to the status of Egham.</p> <p>4.5 Appendix C could be updated to take account of the progression of the Runnymede Local Plan- 'recently completed Reg 18 Consultation' and the conclusions column could say that Phase 2 assessed the Green Belt Assessment against potential constraints. Appendix C could include reference to the Runnymede Green Belt Villages Review.</p>	<p>built-up area whereas Figure 4.4 relates to Purpose 2 (prevent neighbouring towns merging into one another). As such, the criteria for assessing each of the Green Belt Purposes set out in the NPPF are different and so the assessment must account for the different classifications of Egham as both a town and a built up area.</p> <p>4.5- Appendix C to be updated to take account of Runnymede Local Plan progress, including a Green Belt villages review and a recently commenced more detailed assessment of the Green Belt on the edges of settlements.</p> <p>Agree to the following factual changes:</p> <ul style="list-style-type: none"> • Update Table 3.1 to take account of the identification of land parcels by Runnymede BC. • Update Appendix C to take account of Runnymede Local Plan progress.
00028/3/001	<p>Guildford Borough Council</p> <p>We note that the study is only intended to assess the contribution that land makes to the Green Belt purposes and does not seek to identify sites that could be potentially released from the Green Belt to accommodate development needs. However, as noted in section 3.1.4 of the document, case law has established that the existence of countervailing exceptional circumstances is capable of trumping the purposes of the Green Belt. It follows therefore that the strength to which land contributes towards Green Belt purposes does not necessarily preclude this land from being appropriate for removal from the Green Belt so long as the significance of the countervailing exceptional circumstances is of a similar degree. We therefore support the approach of this Green Belt review as a first step to enable Spelthorne to consider the relevant exceptional circumstances against the findings of this study in deciding the extent to which Green Belt will be required to meet development needs.</p>	<p>5. Guildford Borough Council</p> <p>5.1 We note that the study is only intended to assess the contribution that land makes to the Green Belt purposes and does not seek sites that could potentially be released.</p> <p>5.2 As noted in section 3.1.4, case law has shown that countervailing exceptional circumstances are capable of trumping the purposes of the Green Belt. The strength to which land contributes to the Green Belt purposes won't necessarily prevent this land from being appropriate for removal from the Green Belt, so long as the exceptional circumstances are significant enough.</p> <p>5.3 We support the approach of this Green Belt review as a first step to enable Spelthorne to consider the relevant exceptional circumstances against the findings of this study in deciding the extent to which Green Belt will be required to meet development needs</p>	<p>5.1- Comment noted.</p> <p>5.2, 5.3- Support of approach noted. It is acknowledged that Green Belt boundaries should only be altered in exceptional circumstances, through the review of the Local Plan (NPPF Para 83). 'Exceptional circumstances' may override the purposes set out in the NPPF depending on the strength of these purposes.</p> <p>Recommendations will be taken forward to inform any decisions taken on amending the Green Belt boundaries following further work (outside the scope of this Assessment).</p> <p>5.4- Support for Local Area assessment noted.</p> <p>5.5- Support noted. Paragraph 85 of the NPPF notes that boundaries should be defined clearly, using</p>

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	<p>We support the identification of Local Areas against which the Green Belt purposes can be assessed. Furthermore, we support the proposed approach set out in Section 4.4 which states that “The assessment will also consider, if appropriate, whether there are any smaller scale sub-areas within Local Areas which might be less sensitive and thus able to accommodate change. In these cases, a further assessment will consider the potential for Green Belt boundaries to be adjusted without significantly reducing the ability to meet NPPF purposes.” This acknowledges that smaller sites could potentially be removed from the Green Belt without harming the main purposes of the Green Belt that the wider land parcel performs.</p> <p>Purpose 1: To check unrestricted sprawl of large built-up areas We support the way in which Purpose 1 is being interpreted. Whilst we note that you state under Assessment 1(b) that a tree line is considered to be a soft boundary which lacks in durability, our Green Belt and Countryside Study has considered woodlands, hedgerows and trees belts to all meet the tests in the NPPF.</p> <p>Purpose 2: To prevent neighbouring towns merging into one another. We support the way in which Purpose 2 is being interpreted.</p> <p>Purpose 3: To assist in safeguarding the countryside from encroachment. We support the way in which Purpose 3 is being interpreted.</p> <p>Purpose 4: To preserve the setting and special character of historic towns. We support the way in which Purpose 4 is being interpreted. Our GBCS has adopted a similar approach and widened the interpretation of this purpose to include Conservation Areas associated with the borough’s towns and villages. In addition, it assessed the potential impact upon the setting and special character of historic elements of Guildford, through cross reference to the Landscape Character Assessment (rural / urban fringe assessment 2007) and the likely impact upon Historic Parks and Gardens and Scheduled Monuments.</p> <p>Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. We support the exclusion of this purpose from the assessment given it is applicable to all Green Belt.</p>	<p>5.4 We support the identification of Local Areas against which the Green Belt purposes can be assessed.</p> <p>5.5 Support Purpose 1. We note that you state under assessment 1(b) that a tree line is considered to be a soft boundary which lacks durability, however our Green Belt and Countryside Study has considered woodlands, hedgerows and tree belts to all meet the tests of the NPPF.</p> <p>5.6 Support approach to Purpose 2, 3, 4 and 5.</p>	<p>physical features that are readily recognisable and likely to be permanent. It is considered that field boundaries can change and tree lines can be cut down. Durable features will therefore be amended to include ‘protected/ strongly established woodland/hedge/tree line’ and softer features to include ‘field boundary/weak tree line’.</p> <p>Text to be added to clarify permanent and soft boundaries.</p> <p>5.6- Support Noted for the approach to Purposes 2-5.</p> <p>Agree to following changes:</p> <ul style="list-style-type: none"> • Agree to add text to clarify permanent and soft boundaries in section 4.4.1 (pg. 30), Assessment 1(b). • Move ‘strongly established tree line’ to ‘durable features’.

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01854/1/001	<p><i>Pardip Sharma on behalf of Capital Finance and Development Ltd</i></p> <p>1. This response is made in general terms and more specifically in relation to land situate adjacent to Stanwell Farm House, Bedfont Road, Stanwell as edged in red on the attached plan ("Stanwell land").</p> <p>2. Paragraph 1.2 of the methodology identifies the purpose of the assessment is to provide evidence of how different areas perform against Green Belt purposes, and then the evidence may be taken into account by the Council. The assessment does not seek an assessment of whether the land in the Green Belt could be released for development. We consider that the purpose of this assessment is flawed and not consistent with paragraph 84 of the NPPF. We consider that the purpose of the assessment should be widened to include broad areas or parcels of land, which could potentially be removed from the Green Belt and graded as to their suitability for development to deliver future residential or employment growth. Please confirm whether this is part of a stage 2 review or further options appraisal? It is not clear why reference is made to the fact that the Council "may" take the evidence into account. Should this not read that the Council "will" take the evidence into account given Arup's have been employed for purposes of the review?</p> <p>3. Given that the appraisal of Green Belt is based on both objective and subjective planning judgments, please confirm if the Council will provide an opportunity for the community to comment on the final independent and objective appraisal by Arup's?</p> <p>4. Consultations usually have reference to a clear timetable of actions and events. When is the consultation response going to be considered by the Council and what will be the next steps and timelines?</p> <p>5. The NPPF seeks to align Green Belt boundary review with sustainable patterns of development (paragraph 84). Authorities are encouraged to "consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary". Paragraph 85 states that when defining boundaries, authorities should ensure consistency with the Local Plan strategy for meeting identified requirement for sustainable</p>	<p>6. <i>Pardip Sharma on behalf of Capital Finance and Development Ltd</i></p> <p>6.1 This response is made in general terms and in relation to land situated adjacent to Stanwell Farm House, Bedfont Road, Stanwell.</p> <p>6.2 Para 1.2- We consider the purpose of the assessment (to provide evidence of how different areas perform against Green Belt purposes) is flawed and not consistent with paragraph 84 of the NPPF. The assessment should be widened to include broad areas or parcels of land which could potentially be removed from the Green Belt and graded as to their suitability for development. Please confirm whether this is part of a stage 2 review or further options appraisal?</p> <p>6.3 It is not clear why reference is made to the fact that the Council "may" take the evidence into account</p> <p>6.4 Please confirm whether the Council will provide an opportunity for the community to comment on the final independent and objective appraisal by Arup?</p> <p>6.5 When is the consultation response going to be considered by the Council and what will the next steps/ timeline be?</p> <p>6.6 Paragraph 85 of the NPPF states that "when defining boundaries, LPAs should ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development; not include land which it is unnecessary to keep permanently open". Given that Stanwell Land is not open land and is previously developed (brownfield site) please confirm whether account will be taken of paragraph 84 and 85 when assessing the Stanwell Land?</p> <p>6.7 Could the council clarify how the assessment will take into account paragraph 44 and 45 of the NPPG on Housing and economic land availability assessment when assessing the Stanwell Land?</p> <p>6.8 In relation to Purpose 3, PAS state that the recommended approach is to look at the difference between land under the influence of the urban area and open countryside, and to favour open countryside when determining the land that should be attempted to be kept open,</p>	<p>Comments on the merit of the particular site in Stanwell are not of themselves relevant to consider the methodology of this stage 1 study.</p> <p>6.1- Response noted.</p> <p>6.2- As stated in para 1.2 this study does not seek to assess whether land in the Green Belt could be released for development, only whether it fulfils the purposes set out in the NPPF. The NPPF provides no guidance on how a Green Belt Assessment should be carried out. Recommendations will be taken forward to inform any decisions taken on amending the Green Belt boundaries if required following further work (outside the scope of this Assessment).</p> <p>6.3- Amend text to '<u>will</u> be taken into account'.</p> <p>6.4- SBC will be consulting on the draft Green Belt Assessment once carried out.</p> <p>6.5- SBC has fed the consultation responses back to Arup and the methodology will be edited where necessary. The Council will continue to provide updates on the Local Plan programme on its website.</p> <p>6.6- Point 1 of Paragraph 85 of the NPPF refers to meeting identified requirements for sustainable development. SBC is at an early stage of reviewing its local plan therefore has not yet identified its strategy for meeting sustainable development requirements. This stage 1 assessment seeks to examine whether areas fulfil the Green Belt purposes set out in the NPPF and the recommendations will be taken forward to inform further work. All sites will be assessed using the criteria set out in the methodology.</p> <p>6.7- Para 44 notes that need alone is not the only factor to be considered when drawing up a local plan. LPAs should meet the OAN unless any adverse impacts of doing so would significantly outweigh the benefits when assessed against the Framework as a whole or specific policies that indicate that development should be restricted (as it is with land</p>

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	<p>development: Not include land which it is unnecessary to keep permanently open. Given that Stanwell Land is not open land and is previously developed (brownfield site please confirm whether account will be taken of paragraph 84 and 85 when assessing the Stanwell Land?</p> <p>6. Could the council clarify how the assessment will take into account paragraph 044 (Do housing and economic needs override constraints on the use of land, such as Green Belt?) and 045 (Do planning authorities have to meet in full the housing needs identified in needs assessments?) of the National Planning Guidance.</p> <p>7. The Planning Advisory Service (PAS) guidance for Green Belt Assessment outlines considerations to be made in relation to the five purposes. In relation to purpose 3 - to assist in safeguarding the countryside from encroachment, PAS state that the recommended approach is to look at the difference between land under the influence of the urban area and open countryside, and to favour open countryside when determining the land that should be attempted to be kept open, accounting for the edges and boundaries. Given that the Stanwell Site is "under the influence of the urban area", please confirm whether this aspect of the guidance will be taken into account when assessing how the Stanwell site performs against Green Belt purposes.</p> <p>8. Paragraph 4.4 sets out the process in relation to local assessment. Could you clarify how the assessment will be made where parcels of land like the Stanwell site have an urban character and are previously developed land?</p> <p>9. It is noted that paragraph 4 of 4.4 states that "the assessment will also consider, if appropriate, whether there are any smaller scale sub-areas within the Local Areas which might be less sensitive and thus able to accommodate change. In this case, a further assessment will consider the potential for Green Belt boundaries to be adjusted without significantly reducing ability to meet NPPF purposes. A Local Area fulfilling the criteria weakly across all purposes will be deemed to be weaker Green Belt. These recommendations will be taken forward to inform any decisions taken on the amending Green Belt following further assessment work" Please clarify: what criteria will be used to assess if an area is a "smaller scale sub-area"; when will such decisions be taken forward; when will the further assessment work be carried out and will this process be subject to a further consultation.</p>	<p>accounting for the edges and boundaries. Given that the Stanwell Site is "under the influence of the urban area", please confirm whether this will be taken into account when assessing how the Stanwell site performs against Green Belt purposes.</p> <p>6.9 Paragraph 4.4 sets out the process in relation to local assessment. Could you clarify how the assessment will be made where parcels of land have an urban character and are previously developed?</p> <p>6.10 Paragraph 4.4 states that "the assessment will consider whether there are smaller sub-areas within Local Areas which might be less sensitive and thus able to accommodate change". Please clarify: (1) what criteria will be used to assess if an area is a 'smaller scale sub-area' (2) when will such decisions be taken forward (3) when will the further assessment work be carried out and will this process be subject to a further consultation?</p> <p>6.11 (1)The assessment criteria in Figure 4.3 (Purpose 1) appears to be flawed as it does not cater for areas which have an urban character and a lawful commercial use. (2) A third criteria should be inserted which includes the degree to which the Green Belt Local Area is contained by built form.</p> <p>6.12 Purpose 3 criteria focuses on percentage built form. This should be amended to cover lawful use of a site too so that the whole picture is regarded.</p> <p>6.13 The assessment divides Green Belt into Strategic and Local Area. This is a broad brush approach and it is not clear how the study will deal with a parcel of previously developed land that no longer meets a Green Belt purpose.</p>	<p>designated as Green Belt). As such, the assessment methodology acknowledges that exceptional circumstances are required if boundaries are to be altered. The assessment will identify the relative strength of Green Belt sites and will provide a robust basis for the Local Plan. Any further work deemed necessary is outside the scope of this stage 1 Green Belt Assessment.</p> <p>Para 45 notes that assessing need will be the first stage of the local plan, then a Strategic Land Availability Assessment will be used to assess land availability (and also consider constraints). The Green Belt Assessment forms an early evidence base document for the Local Plan review and will be used to inform the SLAA when undertaken.</p> <p>6.8, 6.9- Purpose 3 (para 4.4.3) of the methodology includes 'openness' as part of the assessment criteria, which refers to the extent to which the Green Belt land could be considered open from an absence of built development. A score will be given based on the percentage of built form and then a qualitative assessment of character will take place to determine whether a score needs revising. Broad categorisation of areas have been differentiated: rural/ semi-urban/ urban to assess the role that different character areas play in fulfilling Purpose 3. The assessment therefore seeks to establish the extent to which areas of the Green Belt have already been encroached upon / urbanised, linking back to the text contained in the PAS guidance ('land under the influence of the urban area').</p> <p>6.10- The role of smaller areas within the wider Green Belt area will be assessed to consider if they are less sensitive to the change, based on their fulfilment of the NPPF purposes. If necessary, further assessment work will be carried out following the Green Belt Assessment. This will be subject to public consultation.</p> <p>6.11- (1) Bullet b) on page 30 notes that it is necessary to consider 'the degree to which the Green Belt Local Area is contained by built form and the nature of this physical containment'. As such, the</p>

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	<p>10. Paragraph 4.4.1 sets out the methodology to be used for purpose one: to check the unrestricted sprawl of large built up areas. The assessment criteria in figure 4.3 appears to be flawed as it does not cater for areas like the Stanwell site which have an urban character and a lawful commercial use i.e. contractors yard in respect of a large part of the site. An additional third criteria should be inserted which includes the degree to which the Green Belt Local Area is contained by built-form and therefore has no function in preventing sprawl.</p> <p>11. Paragraph 4.4.3 sets out the assessment criteria for purpose 3: to assist in safeguarding the countryside from encroachment. We note that the assessment criteria focus on the percentage of built form. We consider that the criteria should include reference to the lawful use of the site and not just to the built form. For example the Stanwell land has a lawful use as a contractors yard and storage with no height restrictions. This lawful use has a greater potential impact on the openness of the countryside than sporadic buildings. Regard should be had to the whole picture, and failure to take into account the lawful use of a site when carrying out the study could lead to a misleading outcome. Please clarify whether the criteria for purpose 3 will be amended to cover our points in paragraph 11.</p> <p>12. Paragraph 2.2 deals with parcel identification and the division into Strategic and Local Assessment. This is a broad brush approach and it is not clear how the study will deal with a parcel of previously developed land that no longer meets a Green Belt purpose but sits within a Strategic Area.</p>		<p>relationship between the Local Area and the character of the built up area will form part of the assessment and Assessment.</p> <p>Character, whether it be urban or rural, will be assessed later under Purpose 3.</p> <p>(2) It is considered that the degree to which the Green Belt Local Area is contained by the built form is covered under criteria (b) as this focuses on how the area acts as a barrier and the relationship that exists with the built-up area.</p> <p>6.12- Paragraph 2 of page 35 currently notes that "broad categorisation has been developed encompassing assessments of land use..." As such, land use will be considered under Purpose 3.</p> <p>6.13- All land in the Green Belt will be assessed at both the wider strategic level, to show its role in the sub-region and at the Local Area level, based on suitable boundaries. All Green Belt, including previously developed land, will be assessed using the purposes set out in the NPPF.</p> <p>Agree to following changes:</p> <ul style="list-style-type: none"> • Agree to amend Section 1.2, page 2 by changing 'may' to 'will'.
0026/6/001	<p>Elmbridge Borough Council</p> <p>Officer level comments only: Under the duty to cooperate, local authorities are required to engage constructively, actively and on an on-going basis to maximise the effectiveness of Local Plan preparation in the context of strategic boundary matters. Green Belt is a strategic, cross-boundary matter. As such we consider it beneficial that Spelthorne Borough Council has appointed Ove Arup & Partners Ltd (ARUP) to complete their State 1 Assessment. Using the same consultants as Elmbridge and also the neighbouring Borough of Runnymede should ensure a level of consistency between our various studies.</p>	<p>7. Elmbridge Borough Council</p> <p>7.1 Under the Duty to Cooperate Green Belt is a strategic, cross boundary matter. As such we consider it beneficial that Spelthorne Borough Council has appointed ARUP to complete their Stage 1 Assessment. Using the same consultants as Elmbridge and neighbouring Runnymede should ensure a level of consistency between our various studies.</p> <p>7.2 The continued identification of Strategic Areas across the Borough and into neighbouring authorities is particularly welcomed. The identification of Strategic Areas A and B and where they interconnect with Elmbridge is consistent with our review.</p>	<p>7.1- Comment noted.</p> <p>7.2- Support noted.</p> <p>7.3- Appendix C to be updated to note Green Belt Review progress in Elmbridge.</p> <p>7.4- Text to be amended.</p> <p>7.5- Amend text in section 3.6 to note that Purpose 4 will be used to assess Green Belt performance. Change text from 'historic settlements' to 'historic towns'.</p>

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	<p>Focusing on the draft Methodology, the continued identification of Strategic Areas across the Borough and into neighbouring Berkshire, London, and Surrey authorities (section 4.2.1) is particularly welcomed. As set out in this section, the identification of Strategic Areas A and B and where they interconnect with Elmbridge Borough is consistent with our Review.</p> <p>In terms of the details of the draft Methodology, a number of points are raised below which may require further consideration by Spelthorne Borough Council:</p> <ul style="list-style-type: none"> Table 3.1 - the Council has completed an assessment of Absolute Constraints to development within the Green Belt. This was not part of the Green Belt Boundary Review but completed in-house. The Council consulted neighbouring authorities on the draft Methodology for this work. In addition, the Council is about to commence a piece of work looking at more minor amendments to the Green Belt Boundary e.g. where anomalies or historic mapping errors have occurred. Section 3.6 - the bullet point exploring Historic Towns (Purpose 4) refers to 'in the Hertsmere context' (last line). Should this be Spelthorne? Section 3.6 / page 20 - 3rd from the bottom bullet point. States that the label 'historic towns' applies to a select number of settlements and it is therefore accepted that the Purpose 4 assessment will only be relevant in very few instances. It continues that Purpose 4 is not relevant to the Spelthorne Green Belt Assessment due to the absence of any relationship between historic settlements and Green Belt in Spelthorne. Nevertheless, Section 4.4.4 then sets out why Purpose 4 applies and the criteria that will be considered etc. This inconsistency in approach needs to be addressed. Following the point above, there is concern as to the proposed use of Purpose 4 and the justification for taking such an approach. As stated in PAS Guidance this is only likely to apply to very few settlements in practice due largely to the pattern of modern development that often envelopes historic towns today. Whilst it is acknowledged that Conservation Areas and other landmarks have a historic nature / features that should be preserved, it is queried whether these are sufficient to warrant the status / label 'historic town'? Furthermore, neither the Elmbridge nor Runnymede studies applied Purpose 4. Forming 	<p>7.3 Table 3.1 Green Belt Assessments in Neighbouring Authorities: Elmbridge has completed an assessment of Absolute Constraint to development within the Green Belt. This was not part of the Green Belt Boundary Review but was completed in house. The Council consulted neighbouring authorities on the draft methodology. The Council is about to commence a piece of work looking at more minor amendments to the Green Belt Boundary.</p> <p>7.4 Section 3.6, Bullet on Historic Towns: refers to 'in the Hertsmere context'. Should this be Spelthorne?</p> <p>7.5 Section 3.6/page 20- 3rd bullet point from bottom: states that the label 'historic towns' applies to a select number of settlements and will only be relevant in very few instances. It continues that Purpose 4 is not relevant to the Spelthorne Green Belt Assessment due to the absence of any relationship between historic settlements and Green Belt in Spelthorne. Section 4.4.4 then sets out why Purpose 4 applies and the criteria that will be considered. This inconsistency in approach needs to be addressed.</p> <p>7.6 (1) There is concern as to the proposed use of Purpose 4 and the justification for taking such an approach. It is queried whether Conservation Areas are sufficient to warrant the status of 'historic town'? (2) Furthermore neither the Elmbridge nor Runnymede studies apply Purpose 4. Forming the Upper M3 area, it is considered beneficial that our three authorities follow a comparable approach.</p> <p>7.7 Figure 4.4 and footnote 8: the identification of areas within Elmbridge Borough i.e. Molesey, forming part of the Greater London area, is consistent with our review. This should be expanded to include the area of Dittons (Long Ditton, Thames Ditton, Hinchley Wood and Weston Green).</p> <p>7.8 Figure 4.2: Molesey and Dittons should also be identified as part of the Greater London larger built-up area.</p> <p>7.9 When identifying local areas (parcels), the approach to look across the Borough boundary, should this not coincide with a permanent and</p>	<p>7.6- (1) Reference to historic 'towns' rather than 'settlements' reflects national guidance which it is important to follow in this study. On reflection it is considered that the inclusion of Purpose 4 is not justified in the Spelthorne context, apart from Staines-upon-Thames, as the conservation areas do not warrant the status of 'historic town' given their size and position within the wider town areas.</p> <p>Text to be amended from historic 'settlement' to 'town' where relevant.</p> <p>(2) Whilst the approach in other studies is noted, consideration of Purpose 4 is necessary for Staines-upon-Thames as the conservation area has been used to identify the historic nature of the town and whether the Green Belt plays a role in the historic setting, thus reflecting the purposes of Green Belts set out in the NPPF.</p> <p>7.7- Comment noted. Footnote 8 to be amended to include Dittons.</p> <p>7.8- Footnote to be added to Figure 4.2 to amend settlements forming the Greater London large built up area.</p> <p>7.9- Consistency between assessments noted. The Spelthorne Green Belt Assessment will take account of neighbouring authority assessments to ensure a consistent approach where achievable. It is helpful to understand how neighbouring authorities have divided their Green Belt for assessment so that 'parcels' may be aligned where possible.</p> <p>7.10- Spelthorne will consult neighbouring local authorities on the results of the assessment under the Duty to Cooperate where appropriate.</p> <p>Agree to the following factual changes:</p> <ul style="list-style-type: none"> Update Appendix C to take account of Green Belt Review Progress in Elmbridge. Amend text to 'in the <u>Spelthorne</u> context'.

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	<p>the Upper M3 area, it is considered beneficial that our three authorities follow a comparable approach. Additional stages within the assessment will introduce new difficulties when comparing consistency so that one study can be confidently considered alongside another (as stated in the Surrey Local Strategic Statement (LSS)).</p> <ul style="list-style-type: none"> Figure 4.4. & footnote 8 - the identification of areas within Elmbridge Borough i.e. Molesey, forming part of the Greater London area is consistent with our Review. Nevertheless, this should be expanded to include the area of Dittons (Long Ditton, Thames Ditton, Hinchley Wood & Weston Green). Molesey is separated from the Greater London Authority area by the River Thames whereas the urban area of Dittons directly adjoins the built-form of Surbiton / Kingston thus providing the connection through to Molesey. Following the bullet point above, Molesey & Dittons should also be identified as part of the Greater London larger built-up area as set out in Figure 4.2. <p>As part of the identification of local areas (parcels) it is noted that the Spelthorne Green Belt Assessment will look across the Borough boundary, should this not coincide with a permanent and durable boundary feature. This is the same approach taken in the Elmbridge Green Belt Boundary Review and it is therefore important to ensure consistency between our two studies in regard to our shared boundary. When identifying local areas along the boundary, the Spelthorne Assessment should pay particular attention to the following parcels and their assessment in the Elmbridge Green Belt Boundary Review: 64, 68, 73 & 79.</p> <p>Furthermore, it is requested that the draft assessment of any parcel that overlaps into Elmbridge Borough is shared and discussed with the Council prior to any wider public consultation.</p>	<p>7.10 durable feature, is the same approach taken in the Elmbridge Green Belt Boundary Review. When identifying local area along the boundary, the Spelthorne Assessment should pay particular attention to the following parcels and their assessment in the Elmbridge Green Belt Boundary Review: 64, 68, 73 & 79.</p> <p>It is requested that the draft assessment of any parcel that overlaps into Elmbridge Borough is shared and discussed with the Council prior to any wider public consultation.</p>	<ul style="list-style-type: none"> Add text to clarify the relevance of Purpose 4 (Section 3.6, pg. 20). Section 4.4.4- change references from historic ‘settlements’ to ‘towns’. 2nd para, pg. 36- change ‘the city’ to ‘a city’. 3rd para, pg. 36- change sentence to ‘...geographical area as being of potential relevance...’ Remove references to conservation areas under purpose 4, with the exception of Staines-upon-Thames. Amend footnote 8 to include Dittons. Add footnote to Figure 4.2 to amend settlements forming the Greater London large built up area.
00031/4/001	<p>Tandridge District Council</p> <p>Firstly, Tandridge District Council (TDC) acknowledges and welcomes the opportunity to have effective and ongoing dialogue under the duty to cooperate with Spelthorne Borough Council.</p> <p>TDC prepared a Duty to Cooperate Scoping Statement 2014, and a Duty to Cooperate Statement Update 2015 that sat alongside the TDC Regulation 18 Local Plan that was published</p>	<p>8. Tandridge District Council</p> <p>8.1 In our Duty to Cooperate Scoping Statement 2014, we identified that the only strategic issues between Tandridge and Spelthorne are housing and traveller needs.</p> <p>8.2 It is acknowledged that Spelthorne and Tandridge sit at opposite sides of the county; we are still committed to ensuring further consultation takes place under the Duty to Cooperate. Emerging</p>	<p>Comments noted.</p> <p>No changes to be made.</p>

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	<p>for consultation between 18 December 2015 and 26 February 2016. A further iteration of the DtC Statement Update has been prepared to accompany the Local Plan: Sites Consultation which commenced public consultation on 4th November 2016.</p> <p>TDC's scoping statement provides a good foundation to direct and discuss strategic matters with the relevant bodies. As TDC continue to prepare their Local Plan, the Duty to Cooperate statement will be updated to reflect how things have progressed. It is intended that this will be done at each regulation stage to reflect the discussions had and mechanisms put in place through each regulation stage.</p> <p>In our Duty to Cooperate Scoping Statement 2014, we identified that the only strategic issues between Tandridge and Spelthorne are housing and traveller needs.</p> <p>It is acknowledged that Spelthorne and Tandridge sit at opposite sides of the county; we are still committed to ensuring that further consultation takes place under the Duty to Cooperate and we will be willing to attend any meetings in the future as necessary. Emerging evidence gathering for our Local Plan is demonstrating that meeting our full OAN will be challenging. Whilst we are taking every necessary step to try and meet our needs, should any opportunity to assist us in doing so, arise, we would very much welcome this and be happy to discuss.</p> <p>Green Belt Assessment:</p> <p>TDC are in general support and agreement with the methodology for the Green Belt Assessment and it follows a comparable approach that our own GBA Methodology has taken.</p>	<p>evidence gathering for our Local Plan is demonstrating that meeting our full OAN will be challenging. Should any opportunity assist us in doing so, arise, we would very much welcome this and be happy to discuss.</p> <p>8.3 TDC are in general support and agreement with the methodology for the Green Belt Assessment and it follows a comparable approach that our own GBA methodology has taken.</p>	
01825/2/001	<p><i>Terence O'Rourke on behalf of Redrow Homes</i></p> <p>1. Overview</p> <p>This representation to the Green Belt Assessment - Methodology consists of two parts. The first highlights that the proposed methodology does not take account of the need to promote sustainable patterns of development through the green belt review process. The second identifies a number of issues with how the performance of land against the purposes of being included within the green belt is assessed. Notwithstanding the outcomes of any assessment once it has taken place, the</p>	<p>9. <i>Terence O'Rourke on behalf of Redrow Homes Sustainable development</i></p> <p>9.1 The proposed methodology does not take account of the need to promote sustainable patterns of development through the Green Belt review process.</p> <p>9.2 The methodology is likely to introduce a bias that will undermine the ability of the assessment to provide a robust evidence base. The local plan cannot provide for the 'most appropriate strategies' (NPPF, para 182), bringing into question the soundness of the Local Plan</p>	<p>Much of this representation covers points beyond the intended scope of this stage 1 methodology.</p> <p>9.1, 9.2, 9.5, 9.6, 9.7- Point 1 of Paragraph 85 of the NPPF refers to meeting identified requirements for sustainable development. SBC is at an early stage of reviewing its local plan therefore has not yet identified its strategy for meeting sustainable development requirements. This assessment seeks to examine whether areas fulfil the Green Belt purposes set out in the NPPF</p>

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	<p>scoring system, in our view, is likely to be weighted heavily in favour to finding a very limited number of local areas to be considered for green belt removal.</p> <p>Disregarding the need to promote sustainable patterns of development through the assessment, especially in a borough that lies within the metropolitan green belt, and adopting a methodology that is likely to introduce a bias undermines the ability of the assessment to provide a robust evidence base that will inform any strategies in the emerging local plan. Ultimately, the local plan cannot provide for the 'most appropriate strategies', as required by paragraph 182 of the NPPF, when the evidence base is inherently flawed. This would bring into question the soundness of the local plan.</p> <p>2. Sustainable patterns of development</p> <p>The NPPF is clear that local plans are the key to delivering sustainable development and must contribute to the achievement of this (paragraphs 150 and 151). 'Achieving sustainable development' is described in the NPPF under 13 headings, heading no. 6 is entitled 'Delivering a wide choice of high quality homes'. Under this heading paragraph 47 requires local planning authorities to boost significantly the supply of housing, including the need to meet the OAN and to identify a deliverable five-year housing land supply. Spelthorne is required to fully meet the OAN for housing, 552 - 757 new dwellings 2013-33, in accordance with the requirements of paragraph 47 of the NPPF, as far as is consistent with the policies set out in the NPPF, including paragraph 83, which allows for land to be removed from the green belt in exceptional circumstances.</p> <p>Without prejudicing the outcomes of the current call for sites exercise it is highly likely that exceptional circumstances will exist in the borough to remove land from the green belt given the significant shortfall in meeting the OAN for housing that would result from solely relying on brownfield sites and previously developed land. Indeed, a considerable area of the borough, approximately 65%, lies within the green belt, which includes significant areas of water.</p> <p>Given that it is highly likely that exceptional circumstances will exist, it is important that any land that is released from the green belt for housing can help achieve sustainable patterns of development, as provided for at NPPF paragraphs 84 and 85.</p>	<p>9.3 Spelthorne is required to fully meet the OAN for housing, as far as is consistent with the policies set out in the NPPF, including para 83, which allows for land to be removed from the Green Belt in exceptional circumstances.</p> <p>9.4 It is highly likely that exceptional circumstances will exist in the borough.</p> <p>9.5 Sustainable development should be considered at the outset of the review process and should be explicitly provided for in the methodology. This will inform the land that is to be released from the green belt and allocated for housing but also identifying areas of 'safeguarded land' to meet need beyond the plan period. Reviewing boundaries for these purposes should be clearly outlined in the objectives of the methodology.</p> <p>9.6 The failure to consider the promotion of sustainable patterns of development in the methodology could result in spatial strategies that could increase housing densities in urban areas. This could adversely affect environmental conditions, character and amenity</p> <p>9.7 The specific sustainability credentials of a location/ site in the green belt need to be considered as criteria in the Green Belt Assessment. An appropriate scoring matrix should therefore be provided in the methodology.</p> <p><u>Methodology</u></p> <p>9.8 It is unfortunate that there is no clear national guidance on the preparation of Green Belt Assessments.</p> <p>9.9 No comment on two tier assessment approach. Agree with the methodology for Local Area boundary identification and Strategic Area assessment.</p> <p>9.10 Agree with the reasoning not to assess Purpose 5 of the NPPF</p> <p>9.11 Having stated that all purposes will be scored out of 5, Purposes 1, 2 and 4 can only be scored 0, 1, 3 and 5. We assume this is due to the fact only three criteria have been provided for each of these purposes. If each local area is to be scored out of 0-5 when assessed against each of the four NPPF green belt purposes there need to be 5 criteria for each purpose. Without being able to</p>	<p>and the recommendations will be taken forward to inform further work.</p> <p>PAS guidance notes that a common interpretation of NPPF paragraph 84 is that local plans should identify for development of the most sustainable locations, unless outweighed by the effect on the overall integrity of the Green Belt according to an assessment of the whole of the Green Belt according to its five purposes. As such, how Green Belt performs against the five purposes in the NPPF needs to be assessed prior to any future work on sustainability, which is considered beyond the scope of the methodology.</p> <p>9.3- NPPG paragraph 044 states that 'need alone is not the only factor to be considered when drawing up a Local Plan. LPAs should meet OAN unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework as a whole, or specific policies in the Framework indicate that development should be restricted'. It should be noted that the methodology also notes that exceptional circumstances should be weighed up against the strength of the Green Belt purposes, assessing the advantages and disadvantages of different alternative options for meeting housing need, including those which would not have involved Green Belt adjustments (page 12). Land availability has not yet been identified in the Borough. This Stage 1 study will only test whether the Green Belt fulfils the NPPF purposes.</p> <p>9.4- No evidence available yet to support this claim- outside scope of report.</p> <p>9.8- Comment noted. National policy does not provide any specific guidance on conducting a Green Belt Assessment per se, however there are several relevant sections of the NPPF and PPG to Green Belt assessments.</p> <p>9.9, 9.10- Comments noted.</p>

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	<p>"84 When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.</p> <p>85 When defining boundaries, local planning authorities should: o ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;"</p> <p>The need to promote sustainable patterns of development should be considered at the outset of the review process and should be explicitly provided for in the assessment methodology. Not only will this inform the land that is to be released from the green belt and allocated for housing but also identifying areas of 'safeguarded land' that will be assist in meeting longer-term development needs stretching well beyond the plan period. Reviewing boundaries for these purposes should be clearly outlined in the objectives of the methodology.</p> <p>Ensuring that the promotion of sustainable patterns of development is provided for in the methodology is particularly important given that significant areas of the borough are subject to constraints, including flood risk, noise exclusion zones associated with Heathrow, international, national and local environmental designations, etc., which will affect the suitability of land in these locations to accommodate new homes.</p> <p>Whilst this only relates to the method of green belt review, if it is not done properly it would rule out sustainable locations like Kempton Park, which are currently in the green belt but benefit from excellent sustainability credentials, to contribute to sustainable patterns of development. Kempton Park is in a highly sustainable location with excellent transport connections, especially with the location of Kempton Park railway station at the racecourse. Not only does the station provide direct access to London on the Shepperton to Waterloo line but it has also been identified as a possible station on a regional branch of Crossrail 2. Any housing at Kempton Park would therefore support the Government's push to increase residential density around commuter hubs as set out in the consultation to the NPPF (December 2015 - February 2016). Kempton Park is also close to a number of community services in Sunbury, including primary and secondary schools, and shops.</p>	<p>score 2 the assessment is heavily weighted towards fulfilling Green Belt purposes, for when assessing local areas using the criteria for Purpose 1, 2 and 4 each parcel can only score 0-1 in order to be considered for green belt boundary amendment.</p> <p>Each local area has to score 1 or 2 over all 4 purposes to be deemed weaker Green Belt. A local area may score 0 or 1 in three purposes then score a 3 in one purpose and still be deemed to meet the purpose of the Green Belt.</p> <p>Local areas scoring 1-3 across all purposes should be considered for further assessment.</p> <p>9.12 There is a 5+, 3+ and 1+ score however there is no explanation of why this scoring system is used and what significance the '+' has.</p> <p>9.13 Figure 4.3, Purpose 1b: the wording is the wrong way round- it is assumed that a score with a '+' is more important than one without. Local areas with a permanent and consistent boundary feature are more important than without, however a score with a '+' implies the opposite.</p> <p>9.14 Proforma, appendix B: using 'total' score implies that the scores should be added and adds confusion. The word 'total' should be removed.</p> <p>9.15 In our experience scoring systems are best avoided as they invariably make the assessment too complex and are easily open to manipulation and misuse</p> <p>9.16 The representation also seeks to commend Redrow's site at Kempton Park.</p>	<p>9.11, 9.12- Each of the purposes set out in the NPPF must be considered equally and the scoring system provided is considered to adequately assess each parcel of Green Belt so that a judgement can be made if it is fulfilling its role in the Green Belt. Additional text to be added to clarify the choice of scoring system used in purposes 1 and 2. It is considered that the text for the scoring in purposes 3 and 4 is already clear in the methodology and therefore no additional text is to be added.</p> <p>Those areas deemed to be performing weakly will be assessed further.</p> <p>9.13- Text to be added to clarify use of '+' scoring.</p> <p>9.14- 'Total' to be removed from scoring of each purpose as a Green Belt designation can be justified simply on one of the Green Belt purposes being met.</p> <p>9.15- Comments noted. Scoring system has been utilised in previous Green Belt assessments successfully and is considered robust to test the purposes set out in the NPPF.</p> <p>Agree to the following changes:</p> <ul style="list-style-type: none"> • Additional text to be added to clarify choice of scoring system in purposes 1 and 2. • Text to be added to clarify '+' scoring in Figure 4.3 regarding purpose 1b. • 'Total' to be removed from scoring of each purpose in proforma, Appendix B.

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	<p>Further, the failure to consider the promotion of sustainable patterns of development in the methodology could result in spatial strategies being pursued that would result in unintended consequences such as a significant need to increase housing densities in urban areas. This could further exacerbate environmental issues in these locations, especially poor air quality related to traffic congestion, as well as increasing the likelihood that over development would adversely impact on the amenity and character of these areas.</p> <p>The sustainability appraisal that will accompany the local plan will need to assess all reasonable alternatives, including residential development at Kempton Park, against the sustainability objectives. However, the specific sustainability credentials of a location or site in the green belt, including walking distances to local facilities and services, proximity to public transport connections, scope to improve self-containment on site, etc. need to be considered as criteria in the Green Belt Assessment. An appropriate scoring matrix for assessing performance against these criteria should therefore be provided in the methodology.</p> <p>3. Issues with methodology</p> <p>3.1 General comment: It is unfortunate that while the NPPF clearly sets out the five purposes the green belt is intended to serve and highlights that the local plan process offers the only opportunity for the green belt boundary to be assessed and reviewed, neither the NPPF, nor supporting National Planning Practice Guidance or any other applicable body such as the Landscape Institute provide clear guidance on how to prepare a green belt methodology.</p> <p>As with the majority of green belt methodologies, Arup has therefore undertaken an examination of other green belt assessments carried out elsewhere in the country in order to reveal key lessons in terms of methodology. See section 3.4.2.</p> <p>We have no comment on the two-tier assessment approach that aims to assess the green belt at two different scales, both strategic and local. See section 4.1-4.2.1.</p> <p>Equally, we agree with the methodology for identifying boundaries to local areas, stated in 4.2.2 and the methodology for the strategic assessment in 4.3.</p>		

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	<p>As stated previously there is no guidance for how an assessment should be undertaken and therefore we agree with Arup on the need to develop clear definitions and criteria for each purpose in order to assess how the green belt functions and fulfils the purposes.</p> <p>We agree with their reasoning not to assess NPPF green belt purpose 5 within the Spelthorne assessment using the advice note issued by PAS that states:</p> <p>... "it must be the case that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. If Green Belt achieves this purpose, then all Green Belt does so to the same extent and hence the value of various land parcels is unlikely to be distinguished by the application of this purpose."</p> <p>3.2 Specific methodology comments: The third paragraph of section 4.4, states that:</p> <p>"For each purpose, one or more criteria have been developed using both qualitative and quantitative measures. A score out of five will be attributed for each criterion (Figure 4.1). If a Local Area is considered to have no contribution to a specific purpose, in addition to the detailed analysis undertaken, a statement will be added to the pro-forma to this effect and no score will be attributed".</p> <p>Having stated the need to be transparent and that all purposes will be scored out of five the criteria for purpose 1 (sprawl), 2 (merging) and 4 (setting) can only be scored 0, 1, 3 and 5. We assume this is due to the fact only three criteria have been provided for each of these purposes. If each local area is to be scored out of 0-5 when assessed against each of the four NPPF green belt purposes there need to be 5 criteria for each purpose.</p> <p>Of greater concern is the fact that without being able to score 2 the assessment is heavily weighted in preference of fulfilling the green belt purposes, for when assessing local areas using the criteria for purpose 1, 2 and 4 each parcel can only score 0-1 in order to be considered for green belt boundary amendment.</p> <p>The fourth paragraph of section 4.4, states that:</p>		

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	<p>"...each NPPF purpose should be considered equally significant and that no weighting or aggregation of scores across the purposes will be undertaken. As such, a composite judgement will be necessary to determine whether, overall, Green Belt Local Areas are meeting Green Belt purposes strongly or weakly".</p> <p>This paragraph goes on to state:</p> <p>"...A Local Area fulfilling the criteria relatively weakly, weakly or very weakly (1 or 2) across all purposes will be deemed to be weaker Green Belt. These recommendations will be taken forward to inform any decisions taken on amending the Green Belt boundaries following further assessment work (outside the scope of this Assessment)."</p> <p>While we agree each purpose should be considered as equally significant our concerns arise by the decision to use a scoring system. In our experience scoring systems are best avoided as they invariably make the assessment too complex and are easily open to manipulation and misuse.</p> <p>Not only is the scoring system heavily weighted in preference of fulfilling the green belt purposes, by limiting the opportunity of being able to score only 0-1 on three of the four assessed purposes, but the cut off score for considering local areas for green belt boundary amendment has, in our opinion, been set too low.</p> <p>Each local area has to score 1 or 2 over all four purposes be deemed to be weaker green belt and therefore considered for green belt boundary amendment. Using this method a local area may score 0 or 1 for three of the purposes assessed and yet in scoring one 3 for one of the purposes it is deemed to be meeting the purposes of the green belt and will therefore no longer be considered for green belt boundary review.</p> <p>Considering that approximately 65% of the borough lies within the green belt, which includes significant areas of water and the remaining area is already built development it would be assumed that as many of the local areas as possible within the borough should be seriously considered. While it is difficult to fully understand how the Spelthorne local areas will score using this methodology prior to any assessment being undertaken, we feel this scoring system is likely to be weighted to finding a very limited number of local areas to be considered for green belt</p>		

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	<p>removal, as when using the proposed criteria almost all parcels are likely to score at least one 3.</p> <p>We therefore feel that local areas scoring 1-3 across all purposes should be considered for further assessment work towards reviewing the green belt boundary.</p> <p>There are further scoring anomalies. Apart from having no way of scoring either 2 or 4 for purpose 1b, there is a 5+, 3+ and 1+ and no 0 and yet there is no explanation within the methodology for why this scoring system is used and what significance the + has on the score.</p> <p>The wording to the assessment criteria in figure 4.3 for purpose 1b appears to be the wrong way around. We assume a score with a + is more important than one without. It is therefore assumed that local areas which are predominantly bordered by prominent, permanent and consistent boundary features are more important than those bordered by features lacking in durability or permanence. The scores with a + currently implies the opposite.</p> <p>The Pro forma in appendix B states 'Total score' under each purpose criteria. The word total needs to be removed as this leads to confusion and implies scores should be added together.</p>		
01628/2/001	<p>Staines Town Society Staines Town Society supports the response of Lower Sunbury Residents Association, and adds the following:</p> <p>This assessment may be a statutory requirement, but STS objects to it in principle because it is not consistent with the national and local policy that Green Belt is permanent. Doing such an assessment implies that some sites could be designated as low value and removed from the Green Belt, contrary to the statement of permanence, and encourages those who wish to encroach upon the Green Belt.</p> <p>We further object to the dropping of Purpose 5 from the assessment. Using Purpose 5 affirms the value of every site, which is relevant to assessment.</p>	<p>10. Staines Town Society</p> <p>10.1 Staines Town Society supports the response of LoSRA and adds the following:</p> <p>10.2 This assessment may be a statutory requirement, but STS objects to it in principle because it is not consistent with the national and local policy that Green Belt is permanent</p> <p>10.3 Doing such an assessment implies that some sites could be designated as low value and removed from the Green Belt, contrary to the statement of permanence, and encourages those who wish to encroach upon the Green Belt.</p> <p>10.4 We object to the dropping of Purpose 5 from the assessment. Purpose 5 affirms the value of every site, which is relevant to assessment.</p>	<p>10.2,10.3- The purpose of the Green Belt Assessment is to provide up to date evidence about the extent to which each part of it in Spelthorne still meets the purposes defined in national policy. Such evidence will be essential to demonstrate the continual protection of the Green Belt through the new Local Plan.</p> <p>This study does not seek an assessment of whether land in the Green Belt could be released for development.</p> <p>Para 83 of the NPPF states that local authorities should have regard to their intended permanence in the long term, however boundaries may be altered in exceptional circumstances.</p> <p>Where Green Belt sites are considered to perform weakly against the purposes set out in the NPPF,</p>

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			<p>they will be subject to further assessment work if considered appropriate (outside the scope of this assessment).</p> <p>10.4- Purpose 5, 'To assist in urban regeneration by encouraging the recycling of derelict and other urban land', is a 'blanket' purpose which would apply equally to any parcel of land and will not assist further in deciding if some parcels perform more strongly than others.</p> <p>No changes to be made.</p>
00303/16/001	<p>Lower Sunbury Residents Association This submission also has the support of Keep Kempton Green</p> <p>Background, Purpose, History of, and previous Green Belt Boundary reviews.</p> <p>Firstly, a few general points:</p> <ul style="list-style-type: none"> • Can you please clarify who actually makes the decision confirming that Green Belt meets the purposes as defined in the NPPF? • It would be helpful for future reference if ARUP &/or Spelthorne Borough Council could state how they intend to define 'sustainable development' • We are pleased to see that ARUP have acknowledged that there are clear statements in successive planning policy & guidance that: <ul style="list-style-type: none"> - Green Belt overrides the presumption in favour of sustainable development. - Green Belt may restrain the ability to meet (assessed) housing need, and need alone is not the only factor to be considered. - Green Belt boundaries may only be altered in exceptional circumstances - Spelthorne Borough Council Policy GB1 maintains Green Belt will be permanent and meeting housing need is not listed as a possible exceptional use - Protection of the Green Belt around urban areas is a core planning principle. - Further, positive plans should be made to enhance the beneficial use of the Green Belt and, amongst other things, provide access to Green Belt land. 	<p>11. Lower Sunbury Residents Association This submission has the support of Keep Kempton Green</p> <p>11.1 Can you please clarify who actually makes the decision confirming that Green Belt meets the purposes as defined in the NPPF?</p> <p>11.2 It would be helpful for future reference if SBC/ARUP could define 'sustainable development'.</p> <p>11.3 We are pleased that ARUP acknowledge the following in planning policy and guidance:</p> <ul style="list-style-type: none"> - Green belt overrides the presumption in favour of sustainable development - Green belt may restrain the ability to meet OAN and need alone is not the only factor to be considered. - Green belt may only be altered in exceptional circumstances - SBC policy GB1 maintains Green Belt will be permanent and meeting housing need is not listed as a possible exceptional use - Protection of Green Belt around urban areas is a planning principle. - Positive plans should be made to enhance the beneficial use of Green Belt and provide access to Green Belt land. <p>11.4 National Policy (3.1.1): What land is currently 'safeguarded' and for what purpose?</p> <p>11.5 Legal cases (3.1.4): We note that both examples were where Green Belt was released on appeal- no examples of successful defences, and why. The limited case history only relates to post</p>	<p>11.1- ARUP will be leading on the Green Belt Assessment however Spelthorne Borough Council will guide the work to be undertaken, 'sign off' any final study documents and make any decisions about the new Local Plan.</p> <p>11.2- As noted on page 2 of the NPPF, sustainable development is defined as 'meeting the needs of the present without compromising the ability of future generations to meet their own needs'. The sustainability or otherwise of potential sites is not part of this stage 1 study.</p> <p>11.3- Comments noted.</p> <p>11.4- No land in Spelthorne is safeguarded for future development.</p> <p>11.5- The recent cases included in 3.1.4 are intended to be illustrative of the use of the term 'exceptional circumstances' in the preparation of local plans, given that there is no definition of the term in the NPPF. It is acknowledged that other cases may be of relevance, however the examples included are deemed potentially relevant as post-NPPF cases.</p> <p>11.6, 11.7- Comment noted. Green belt assessments are confined to local authority boundaries, however working with adjoining authorities is important to ensure consistency, in terms of the methodology employed and aligning parcels where possible as Green Belt crosses administrative boundaries.</p>

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	<p>Commenting more specifically on the Policy, Guidance & Context:</p> <p>National policy (3.1.1) Please specify what land is currently 'safeguarded' and for what purpose.</p> <p>Legal cases (3.1.4) We note that both examples of legal cases cited were where Green Belt was released on appeal - no examples are given of successful defences, and why. The limited case history only relates to post NPPF; many cases prior to NPPF exist which are still relevant.</p> <p>Duty to co-operate (3.4.1) We note that Spelthorne Borough Council's Assessment will not directly influence the approaches to Green Belt in neighbouring authorities - neither should neighbouring authorities' Green Belt assessments influence Spelthorne Borough Council.</p> <p>Note: LoSRA's view is that consistency with neighbouring authorities' methodology is only sensible where it is not perverse.</p> <p>Wider experience (3.4.2) There is a high degree of inconsistency/variation in methodology as adopted by examples selected - no specific comparison may thus be relied upon.</p> <p>Consultation (3.5) Please advise if neighbouring authorities engaged with Spelthorne Borough Council on their proposed methodology & Green Belt parcels.</p> <p>Strategic areas (4.2.1) How does the approach adopted by Elmbridge compare with those adopted by other adjoining boroughs?</p> <p>Local areas (4.2.2) Who will conduct the site visits?</p> <p>Non-Green Belt (4.2.3) Please specify who conducted the Green Belt assessments.</p> <p>Purpose 1 Assessment Criteria (4.3) Criteria (a) - clearly the size and shape of Local Areas of Green Belt is going to vary significantly and although they will try to</p>	<p>NPPF; many cases prior to NPPF exist which are still relevant.</p> <p>11.6 Duty to Cooperate (3.4.1): We note that Spelthorne's Assessment will not directly influence the approaches to Green Belt in neighbouring authorities- neither should neighbouring authorities' Assessments influence Spelthorne.</p> <p>11.7 LoSRA's view is that consistency with neighbouring authorities' methodology is only sensible where it is not perverse.</p> <p>11.8 Wider experience (3.4.2): There is a high degree of inconsistency/ variation in methodology as adopted by examples selected – no specific comparison may thus be relied upon.</p> <p>11.9 Consultation (3.5): Please advise if neighbouring authorities engaged Spelthorne on their proposed methodology & Green Belt parcels.</p> <p>11.10 Strategic areas (4.2.1): How does the approach adopted by Elmbridge compare with those adopted by other adjoining boroughs?</p> <p>11.11 Local Areas (4.2.2): Who will conduct the site visits?</p> <p>11.12 Non-Green Belt (4.2.3): Please specify who conducted the Green Belt Assessments?</p> <p>11.13 Purpose 1 (4.3), Criteria (a) - LoSRA does not think there should be a Pass or Fail score. Almost the exact terminology of Purpose 1 is included in Criteria (b) with a relative qualitative/ quantitative scoring system. There is no need to have an initial pass/fail score that would mean a Green Belt local area failed completely on Purpose 1. It will still be someone's judgement whether the Green Belt local area is at the 'edge'.</p> <p>11.14 Local Assessment (4.4): Since no national guidance exists, it is critical that whatever method is adopted is robust and leaves no loopholes</p> <p>11.15 4.4: Each of the NPPF purposes is considered equally significant – is this a requirement of the NPPF? If not then why can't additional weight be added to individual purposes?</p> <p>11.16 Why is the further assessment work to inform decisions taken on amending the Green Belt outside the scope of this Assessment? Is this</p>	<p>11.8- Section 3.4.2 has analysed the assessments of surrounding authorities and this has informed conclusions on best practice for Spelthorne.</p> <p>11.9- Spelthorne engages continuously with surrounding authorities under the Duty to Cooperate.</p> <p>11.10- Table 3.1 and Appendix C show the approaches taken by surrounding local authorities. It is important to develop a methodology which is appropriate to the local context, however at the strategic level it is important to understand the methodologies employed by the surrounding authorities to ensure consistency. The approach of undertaking both a strategic and local assessment is consistent with the approach adopted by Elmbridge.</p> <p>11.11- ARUP will be conducting the site visits as part of the assessment.</p> <p>11.12- Based on past Green Belt Assessments carried out by ARUP.</p> <p>11.13- Purpose 1 is 'to check the unrestricted sprawl of large built-up areas'. This is a simple assessment of whether or not a 'parcel' is so sited to achieve that purpose.</p> <p>11.14- Comment noted. Methodology has been developed based on the local context and to ensure a level of consistency with surrounding authorities' methodologies. The various assessments included in the methodology are considered to provide robustness.</p> <p>11.15- The NPPF does not provide any specific guidance on how to undertake a Green Belt Assessment, however PAS guidance, examples and previous experience by ARUP reiterates the need to consider local circumstances and the unique characteristics that affect the way the NPPF purposes are appraised. There is no guidance or appeal/local plan cases to justify not giving equal weight to the Green Belt purposes.</p>

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	<p>base the areas on fixed and clear features , as ARUP say, this will involve ' professional judgement'. LoSRA does not think there should be a Pass or Fail score against Criteria (a). Purpose 1, as defined by the NPPF is ' to check the unrestricted sprawl of large built up areas'. Almost this exact terminology is used in Criteria (b), with a relative qualitative/ quantitative scoring system. There is no need to have an initial pass/fail score that would mean a Green Belt local area failed completely on Purpose 1, so we consider Criteria (a) is neither required or helpful - it will still be someone's judgement whether the Green Belt local area is at the 'edge'.</p> <p>Local Assessment (4.4) Since no national guidance exists which establishes exactly how assessments should be undertaken, it is critical that whatever method is adopted is robust and leaves no loopholes which can be exploited by potential developers or give undue discretion to Planning Inspectors. Each of the NPPF purposes is (stated to be) considered equally significant - is this a requirement of the NPPF? If not, then why added weight can't be given by Spelthorne Borough Council to individual purposes? Why is the further assessment work to inform decisions taken on amending the Green Belt outside the scope of this Assessment? Is this the equivalent of Phase 2 of the Runnymede Borough Council Assessment? If so, please confirm that this Phase will be publicly consulted on.</p> <p>Criterion scores (Figure 4.1) The Scale allocates a score of 1-5 to parcels meeting the Criterion to a greater or lesser extent. Why is the scale at Figure 4.3 a six point scale?</p> <p>Purpose 1 (4.4.1) There an argument that the built-up area south of Sunbury Cross, extending as it does along the south side of Kempton Park, should not be included in the Local Centre extending from Sunbury Common to Ashford, all of which is North of the A308 (see also 4.4.2 below)</p> <p>Purpose 2 (4.4.2) In Figure 4.4 ARUP set out the settlements to be considered in the assessment. They appear to indicate Ashford/Sunbury on Thames/ Stanwell as one settlement. LoSRA would argue that these are not one settlement (if that is what the table means?) - see also 4.4.1 above. Shepperton/Lower Halliford and Upper</p>	<p>the equivalent of Phase 2 of the Runnymede Assessment? If so, please confirm that this phase will be publicly consulted on.</p> <p>11.17 Criterion Scores (Figure 4.1): The scale allocates a score of 1-5. Why is the scale at Figure 4.3 a six point scale?</p> <p>11.18 Purpose 1 (4.4.1): the built up area south of Sunbury Cross, extending along the south side of Kempton Park, should not be included in the Local Centre extending from Sunbury Common to Ashford, all of which is North of the A308.</p> <p>11.19 Purpose 2 (4.4.2): Figure 4.4- appears to indicate Ashford/ Sunbury on Thames/ Stanwell as one settlement. LoSRA would argue that these are not one settlement. Shepperton/ Lower Halliford and Upper Halliford are indicated as settlements south of the M3. The M3 is such a physical barrier LoSRA would argue it splits the Ashford/ Sunbury on Thames/ Stanwell settlement.</p> <p>11.20 LoSRA is principally concerned about the Green Belt currently being an 'essential gap' between Lower Sunbury and Richmond to the east and Upper Halliford and Shepperton/ Lower Halliford to the west.</p> <p>11.21 Purpose 3 (4.4.3): Up to this point assessment has been largely subjective and qualitative. ARUP are now propose to use a GIS tool to measure the % of built form. LoSRA thinks the problem will be that local areas will all be different in character and ARUP are trying to apply very tight urban form percentages (3-20%). The Runnymede assessment ranged from 10-50%, which LoSRA considers much more appropriate.</p> <p>11.22 ARUP do not mention taking into consideration very special landscape characteristics of some of the Green Belt local areas. Surely this is where a 'pass' could be applied, in terms of Green Belt retention as the land cannot be used for other purposes e.g. the UW3 designation given to Kempton Park in 2015. Why no mention of the racecourse as historic open land?</p> <p>11.23 Purpose 4 (4.4.4): Who was 'another local authority' that prepared the Green Belt Assessment cited and how relevant is it to</p>	<p>11.16- This methodology will only inform the stage 1 Green Belt Assessment, the sole purpose of which is to assess if the Green Belt fulfils the purposes set out in the NPPF. The results of this assessment will inform whether further work is required on the Green Belt. If so, this will be subject to a public consultation.</p> <p>11.17- Figure 4.1 allocates a score from 0 to 5, therefore covering six points. Scoring under each purpose is considered to best assess the Green Belt against the criteria. The criteria provided are considered to sufficiently assess whether the purpose of the NPPF has been fulfilled or not.</p> <p>11.18-11.19 - In the context of assessing Green Belt and the settlement hierarchy in the Spelthorne Core Strategy and Policies DPD 2009, the areas of Ashford and Sunbury factually form one continuous built-up area together with Stanwell, therefore it is considered the most appropriate to count this as a single built-up area. Whilst these settlements are separate urban areas, they have no separation by open land, therefore for the purpose of this part of the study they are recognised factually as a continuous built-up area.</p> <p>11.20- Comment noted. The Green Belt Assessment will explore how parcels perform against each purpose, including Purpose 2 which focuses upon 'gaps' through the assessment of whether Green Belt 'prevents neighbouring towns merging into one another'.</p> <p>11.21- Purpose 3 seeks to safeguard the countryside from encroachment and largely considers 'openness'. Openness in the assessment refers to the extent to which Green Belt land could be considered open from an absence of built form rather than from a landscape character perspective. The assessment will first consider the percentage of built form (with the levels set based on the local context, as implied by the NPPF), and then consider the area in light of qualitative assessments of character. This will then inform whether a score should be revised. As such, both qualitative and quantitative assessments will be</p>

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	<p>Halliford are indicated as settlements south of the M3. The M3 is such a physical barrier LoSRA would argue it splits the Ashford/Sunbury on Thames/Stanwell settlement.</p> <p>As ARUP say in the methodology they will be assessing the extent to which the Green Belt protects a gap between settlements i.e. is the existing Green Belt an 'essential', 'wider' or 'less essential' gap. LoSRA is principally concerned about the Green Belt being currently an 'essential' gap between Lower Sunbury and Richmond to the east and Upper Halliford and Shepperton / Lower Halliford to the west.</p> <p>Purpose 3 (4.4.3): Up to this point the assessment against the criteria has been largely subjective and qualitative. Now ARUP are proposing to use a GIS tool to measure the % of built form in each defined Green Belt local area. LoSRA thinks the problem with this is that the Green Belt local areas will all be different in character and ARUP are trying to apply very, very tight urban form %s (3% up to 20%) in their assessment scoring. In the Runnymede assessment the range was from 10% to 50% - LoSRA considers much more appropriate, given the inbuilt inaccuracies in measuring built form. Also ARUP do not mention taking into consideration very special landscape characteristics of some of the Green Belt local areas, or part of them, and surely this is where a 'pass' could be applied, in terms of Green Belt retention as the land cannot be used for other purposes e.g. the UW3 designation given to Kempton Park in the 2015 Surrey Landscape Character Assessment or the 'Fields in Trust' protection on Orchard Meadow. Incidentally, why no mention of a racecourse as historic open land?</p> <p>Purpose 4 (4.4.4) Who was the 'another local authority' that prepared the Green Belt Assessment cited and how relevant is it to Spelthorne, referring as it does to 'the city's special character and historical setting'? Please explain what is meant by 'it is considered that there is potential for a significant relationship between the historic core of these settlements [including Lower Sunbury]and the adjoining Green Belt'</p>	<p>Spelthorne, referring as it does to 'the city's special character and historical setting'?</p> <p>11.24 Please explain what is meant by 'it is considered that there is potential for a significant relationship between the historic core of these settlements...and the adjoining Green Belt'.</p>	<p>undertaken and the percentage levels of built form set out are intended to reflect the local context of Spelthorne.</p> <p>11.22- Section 3.6 notes that 'A Green Belt Study is not an assessment of landscape quality...' Section 4.4.3 (Purpose 3) states that formal landscape character assessment is not part of the Assessment, although the types of uses and activities within the Green Belt will be considered in the Purpose 3 assessment to identify the broad functional character of each parcel. Purpose 4 also considers the relationship between Green Belt and the character of historic towns. The criteria under these purposes are considered to sufficiently assess the fulfilment of the purposes set out in the NPPF.</p> <p>11.23- Footnote 10 on section 4.4.4 notes Oxford City Council as the 'local authority'. This is considered relevant to Spelthorne given the importance that the Green Belt had in contributing to the city's historic setting and character. As purpose 4 relates to preserving the setting and special character of historic towns and the number of conservation areas in Spelthorne, the Oxford example is illustrative of how the relationship between the fringes of settlements and the surrounding Green Belt contributes to this purpose.</p> <p>11.24- The historic character of the conservation areas in Spelthorne may be enhanced by the surrounding Green Belt. This is in terms of providing both immediate context for the historic settlement and in contributing to views and vistas.</p> <p>No changes to be made.</p>
01868/2/001	<p>Capita</p> <p>Brownfield sites / Previously Developed Land</p>	<p>12. Capita</p> <p><u>Brownfield sites/ Previously Developed Land (PDL)</u></p>	<p>12.1-12.3 - The purpose of the Green Belt Assessment is to consider how the Green Belt</p>

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	<p>It is vital that the Green Belt Assessment prioritises brownfield sites / previously developed land as contributing least towards the NPPF Green Belt purposes. This is in accordance with approach promoted in NPPF Para 17 which states "encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value".</p> <p>In addition, this approach is supported NPPF Para 89 Bullet 6, which is referenced in 3.1.4 of the GB Method, and explains that development within the Green Belt which may be considered as acceptable in the context of "very special circumstances", including "Limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development".</p> <p>This is the only reference to brownfield sites / previously developed land in the GB Method.</p> <p>In response to the NPPF and overarching growth objectives, it is therefore recommended that the GB Assessment recognises the need to identify brownfield sites / previously developed land which has redevelopment potential.</p> <p>Openness</p> <p>Under Para 3.1.1 the GB Method notes that the NPPF Para 79 states that "the essential characteristics of Green Belts are their openness and their permanence". However the assessment makes no assessment of openness (as a unique test). Openness is considered to be as important as the five NPPF purposes and plays a role in achieving each of them, and therefore it must be considered.</p> <p>In addition, the definition of openness is limited as it only considers build development (or an absence of). This covers physical openness. It fails to consider visual openness e.g. views into and from a site.</p>	<p>12.1 It is vital that the Green Belt Assessment prioritises brownfield sites/ PDL as contributing least towards the NPPF Green Belt purposes, in accordance with para 17 'encourage the effective use of land by reusing land that has been previously developed, provided that it is not of high environmental value'.</p> <p>12.2 Para 89, Bullet 6 of the NPPF, 'development within the Green Belt which may be considered as acceptable in the context of "very special circumstances"... which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development', is the only reference to brownfield sites/ PDL in the Green Belt methodology.</p> <p>12.3 It is recommended that the Green Belt Assessment recognises the need to identify brownfield sites/ previously developed land which has redevelopment potential.</p> <p><u>Openness</u></p> <p>12.4 Para 3.1.1 of the Green Belt methodology notes that NPPF para 79 states "essential characteristics of Green Belts are their openness and their permanence". However the assessment makes no assessment of openness (as a unique test). Openness is considered to be as important as the five NPPF purposes and plays a role in achieving each of them, and therefore it must be considered.</p> <p>12.5 The definition of openness is limited as it only considers built form, only covering physical openness and fails to consider visual openness.</p>	<p>performs against the 5 purposes set out in the NPPF. This study will inform the preparation of the Local Plan where relevant, however further work which may come about as a result of this assessment is beyond the scope of this methodology.</p> <p>Para 89, point 6 of the NPPF requires redevelopment of PDL to not have a greater impact on the openness of the Green Belt, which therefore limits the potential development on the site. This is outside the scope of the assessment.</p> <p>12.4- Although the NPPF does not provide explicit guidance on how to carry out a Green Belt Assessment, PAS guidance, experience by ARUP and other examples have been used to produce a methodology most suited to the local context of Spelthorne. As such, it is considered that using the 5 purposes set out in the NPPF and the associated criteria is the most robust way to assess the fulfilment the Green Belt purposes in this stage 1 study. Openness is assessed using the various measures set out in each purpose, providing a robust assessment.</p> <p>12.5- Purpose 3 seeks to safeguard the countryside from encroachment and largely considers 'openness'. Openness in the assessment refers to the extent to which Green Belt land could be considered open from an absence of built form rather than from a landscape character perspective. The assessment will first consider the percentage of built form (with the levels set based on the local context, as implied by the NPPF), and then consider the area in light of qualitative assessments of character. This will then inform whether a score should be revised. As such, both qualitative and quantitative assessments will be undertaken and will reflect upon the area's character using multiple measures.</p> <p>No changes to be made.</p>
01829/1/001	<p><i>GL Hearn on behalf of A2Dominion</i></p> <p><u>Safeguarding the Countryside</u></p>	<p>13. <i>GL Hearn on behalf of A2Dominion</i> <u>Safeguarding countryside</u></p>	<p>13.1, 13.2 - Purpose 3 seeks to safeguard the countryside from encroachment and largely considers</p>

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	<p>Within the GB Method (Para 4.4.3) the assessment of the third NPPF purpose should consider factors beyond the level of built development within a parcel. Currently the scoring system is one dimensional, and in reality it is expected that the highest proportion would be closer to 5%, not 20%+. Therefore, based upon the proposed method, this approach is considered to be unrealistic in measuring "the countryside".</p> <p>Further to this, the proposed approach completely fails to suitably take account of other urban and rural influences which impact on whether land is considered to represent "the countryside". These factors include a range of potential influences such as being located at the edge of settlement and surrounding land uses / features.</p> <p><u>Openness</u></p> <p>Under Para 3.1.1 the GB Method notes that the NPPF Para 79 states that "the essential characteristics of Green Belts are their openness and their permanence". However the assessment makes no assessment of openness (as a unique test). Openness is considered to be as important as the five NPPF purposes and plays a role in achieving each of them, and therefore it must be considered.</p> <p>In addition, the definition of openness is limited as it only considers build development (or an absence of). This covers physical openness. It fails to consider visual openness e.g. views into and from a site or levels of enclosure.</p> <p>Assessment of either views or enclosure are not set out in the GB Method.</p> <p><u>Non-Green Belt</u></p> <p>In light of potential Green Belt releases for development, including housing, across the Borough, it would be useful if the GB Assessment would consider potentially designating non-Green Belt land as Green Belt to compensate for any losses. This non-Green Belt would be expected to contribute to the Green Belt purposes tests and share characteristics similar to designated Green Belt land.</p> <p><u>Scoring System</u></p>	<p>13.1 Purpose 3 of the NPPF should consider factors beyond the level of built development within a parcel. The scoring system is one dimensional and in reality it is expected that the highest proportion would be closer to 5% not 20%. The approach is considered to be unrealistic in measuring 'the countryside'. The proposed approach fails to suitably take account of other urban and rural influences which impact on whether land is considered to represent 'the countryside'.</p> <p><u>Openness</u></p> <p>13.2 Para 3.1.1 of the Green Belt methodology notes that NPPF para 79 states "essential characteristics of Green Belts are their openness and their permanence". However the assessment makes no assessment of openness (as a unique test). Openness is considered to be as important as the five NPPF purposes and plays a role in achieving each of them, and therefore it must be considered. The definition of openness is limited as it only considers built form, only covering physical openness and fails to consider visual openness. Assessment of either views or enclosure are not set out in the methodology.</p> <p><u>Non-Green Belt</u></p> <p>13.3 In light of potential Green Belt releases for development, it would be useful if the Green Belt Assessment would consider potentially designating non-Green Belt land as Green Belt to compensate for any losses.</p> <p><u>Scoring System</u></p> <p>13.4 The scoring system scale of 6 levels is considered challenging. The Green Belt Assessment should be as objective as possible so that it is less open to interpretation and challenge.</p>	<p>'openness'. Openness in the assessment refers to the extent to which Green Belt land could be considered open from an absence of built form rather than only a landscape character perspective. The assessment will first consider the percentage of built form (with the levels set based on the local context, as implied by the NPPF), and then consider the area in light of qualitative assessments of character. This will then inform whether a score should be revised. As such, both qualitative and quantitative assessments will be undertaken and will reflect upon the area's character using multiple measures.</p> <p>The purpose of the assessment is to provide evidence of how different areas perform against Green Belt purposes set out in national policy. Although the NPPF does not provide explicit guidance on how to carry out a Green Belt Assessment, PAS guidance, experience by ARUP and other examples have been used to produce a methodology most suited to the local context of Spelthorne. As such, it is considered that using the 5 purposes set out in the NPPF and the associated criteria is the most robust way to assess the fulfilment the Green Belt purposes. Openness is considered a broad topic and is assessed using the various measures set out in each purpose, providing a robust assessment of whether this has been achieved or not.</p> <p>13.3- The purpose of this assessment is to consider how Green Belt areas perform against the purposes set out in the NPPF, however due to the flexible methodology, non-Green Belt land will be considered as appropriate, as set out in section 4.2.3.</p> <p>13.4- The scoring system employed, along with the various criteria used, is considered the most robust and suitable way of assessing Green Belt performance against the NPPF purposes in the context of Spelthorne. This is based on past experience, the approach taken by surrounding authorities and the local context for Spelthorne.</p> <p>No changes to be made.</p>

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	Scoring system scale of 6 levels is considered to be challenging. The GB Assessment should be as objective as possible to remove subjectivity so that it is less open to interpretation and challenge.		
01696/5/001	Environment Agency We have no comments to make on the Green Belt Assessment Draft Methodology and Spelthorne Functional Economic Area Analysis Draft Report.	14. Environment Agency 14.1 We have no comments to make on the Green Belt Assessment Draft Methodology and Spelthorne Functional Economic Area Analysis Draft Report.	Noted.
01867/2/001	Mr Andrew McLuskey United Reformed Church It is deeply concerning that Heathrow appear to wish to take over the Stanwell Quarry area for a car park notwithstanding this is a) in the Green Belt and b) the site of a planned Nature Reserve	15. Mr Andrew McLuskey United Reformed Church 15.1 It is deeply concerning that Heathrow appear to wish to take over the Stanwell Quarry area for a car park notwithstanding this is a) in the Green Belt and b) the site of a planned Nature Reserve	15.1- Comment noted. Outside scope of Green Belt Assessment Methodology. No changes to be made
01848/1/001	<i>Nexus Planning on behalf of Croudace Homes Group</i> 1.0 Introduction 1.1 On behalf of our client, Croudace Homes, Nexus Planning is submitting representations to the Spelthorne Borough Council Green Belt Assessment (Stage 1) Draft Methodology. The Green Belt Assessment will in due course form part of the evidence base underpinning the emerging Local Plan. 1.2 Croudace Homes controls land at Fordbridge Road, Spelthorne. A supporting Vision Document outlining the constraints and opportunities for development of the Site was submitted to the Council in August 2016. The Vision Document includes a Site Location Plan at Page 3. The document is attached at Appendix 1. 2.0 The Development Plan 2.1 The Documents that make up the Council's Development Plan, including its key document the Core Strategy and Policies DPD, were adopted prior to publication of the National Planning Policy Framework ("NPPF") in 2012. As such, The Core Strategy and Policies DPD contains a housing target derived from the now revoked Regional Spatial Strategy, the South East Plan. This set a total of 3,020 dwellings over the plan period 2006-2026, equivalent to 151 dwellings per annum.	16. Nexus Planning on behalf of Croudace Homes Group 16.1 The housing target in the Spelthorne Core Strategy is out of date and does not represent full objectively assessed need (552-757 homes pa). A release of Green Belt will be required to meet the OAN 16.2 We welcome reference to PAS guidance. <u>Review of Boundaries</u> 16.3 NPPF Para 83 clearly allows Green Belt boundaries to be altered in "exceptional circumstances". Para 84 makes it clear that local planning authorities should take account of the need to promote sustainable patterns of development and further requires consideration of the consequences of channelling development towards non-Green Belt locations. Paragraph 85 seeks consistency with the strategy for meeting identified requirements for sustainable development. 16.4 PPG 045, Ref 3-045-20141006: Need alone is not the only factor to be considered when drawing up a local plan. Constraints need to be considered, including the Green Belt. Fundamentally however, the most appropriate land for development must be identified and	Parts of the representation go beyond the methodology and consider development need generally and the merits of their client's site in Sunbury. 16.1, 16.4, 16.5, 16.25- The purpose of the Green Belt Assessment is to consider how the Green Belt performs against the 5 purposes set out in the NPPF. This study will inform the preparation of the Local Plan where relevant, however further work which may come about as a result of this stage 1 assessment is beyond the document's scope. Point 1 of Paragraph 85 of the NPPF refers to meeting identified requirements for sustainable development. SBC is at an early stage of reviewing its local plan therefore has not identified its strategy for meeting sustainable development requirements. 16.2, 16.3- Comment noted. 16.6, 16.7- comment noted. The Green Belt Assessment will highlight the relative strength of parcels against the Green Belt purposes, however it will be for future work to determine if 'exceptional circumstances' exist to justify and potential alterations to the Green Belt boundary.

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	<p>2.2 The housing requirement embedded in the Core Strategy and Policies DPD does not represent full objectively assessed housing need for the Borough as required by the National Planning Policy framework ('the Framework') at Paragraph 47. As such, it is out of date and work on a replacement Local Plan which will contain a Framework compliant housing target has now commenced.</p> <p>2.3 Underpinning this document is a joint SHMA prepared by GL Hearn (covering Spelthorne and Runnymede) that was published in November 2015. The joint SHMA suggests that the overall need for housing over the 2013-2033 period is as follows:</p> <ul style="list-style-type: none"> o Runnymede: 466 - 535 homes per annum. o Spelthorne : 552 - 757 homes per annum. <p>2.4 It is therefore clear that the emerging document will need to plan for a substantially higher housing target than is contained within the adopted Core Strategy and Policies DPD. The Council accepts that the OAN for Spelthorne cannot be accommodated exclusively within the urban areas and on previously developed sites within the Green Belt. As such, the release of Green Belt land will be required in order to help meet a higher proportion of housing needs.</p> <p>3.0 Policy Context</p> <p>Purposes of the Green Belt</p> <p>3.1 As noted in the Green Belt Methodology at section 3.1.1, the Framework at Paragraph 80 outlines that the Green Belt serves five purposes:</p> <ol style="list-style-type: none"> 1. To check the unrestricted sprawl of large built up areas; 2. To prevent neighbouring towns from merging into one another; 3. To assist in safeguarding the countryside from encroachment; 4. To preserve the setting and special character of historic towns; and 5. To assist in urban regeneration by encouraging the recycling of derelict and other land. <p>3.2 We welcome the reference within the Green Belt Methodology at Chapter 3.3 to the Planning Advisory Service ('PAS') published guidance for Green Belt Assessment from</p>	<p>allocated through a local plan. In order to justify the use of Green Belt land for development through the local plan any assessment needs to take account of sustainability issues.</p> <p>16.5 Clearly the Council accepts that significant weight should be given to the protection of the Green Belt, but greater weight should be given to the need to significantly boost housing supply (NPPF at Paragraph 47) where it is sustainable to do so. The resultant Arup work is intended to identify any land that performs weakly against Green Belt purposes and could therefore be considered for release.</p> <p>16.6 We note and welcome the references to relevant case law. The Solihull/ Gallagher Homes case makes it clear that the test of exceptional circumstances is "a very stringent one" and that whilst each case is fact sensitive, the question of whether circumstances are exceptional requires an exercise of planning judgement.</p> <p>16.7 We would also add that the High Court Decision in the case of St Albans v Hunston Properties Ltd [2013] EWCA 1610 set out beyond any doubt the principle that housing can be an exceptional circumstance. "The Green Belt policy is not an outright prohibition on development in the Green Belt. Rather it is a prohibition on inappropriate development in the absence of very special circumstances". We therefore support the justification within the Green Belt Methodology for this exercise to be undertaken</p> <p><u>Methodology</u></p> <p>16.8 We support the acknowledgement of the broad principles underpinning a review of Green Belt boundaries contained within the Framework i.e. only review through local plan and are permanent.</p> <p>16.9 We accept that there is no standard methodology and local authorities must develop their own that is appropriate. We welcome the summary of PAS guidance included and summary of approaches taken by surrounding local authorities.</p> <p>16.10 We question the usefulness of the identification of Strategic Areas A and B.</p>	<p>16.8, 16.9- Comment noted.</p> <p>16.10- Para 179 of the NPPF notes that 'Local planning authorities should work collaboratively with other bodies to ensure strategic priorities across local boundaries are properly coordinated'. Green belt is a strategic issue, therefore local planning authorities must consider the role that Green Belt plays in the wider sub-regional context.</p> <p>16.11- Support noted.</p> <p>16.12, 16.13- Section 4.2.2 of the methodology notes that parcel boundary refinement will take account of the local context in Spelthorne and a flexible approach to parcel identification has been pursued to enable consideration of the varied urban and rural conditions across the Borough. This will enable parcels to be identified in the most appropriate manner to then be test against the criteria set out in the NPPF.</p> <p>16.14- Sunbury-on-Thames is listed in Figure 4.2 as part of a continuous 'Large built up area' along with Ashford and Stanwell. A map showing the Purpose 1 large built-up areas in relation to identified Local Areas will be included in the final assessment report.</p> <p>16.15-16.20- As set out on page 19 of the methodology, 'neighbouring town' has been interpreted differently by local authorities based on varying local contexts. The assessment will consider gaps between all non-Green Belt settlements.</p> <p>16.21- Purpose 3 seeks to safeguard the countryside from encroachment and largely considers 'openness'. Openness in the assessment refers to the extent to which Green Belt land could be considered open from an absence of built form rather than from a landscape character perspective. The assessment will first consider the percentage of built form (with the levels set based on the local context, as implied by the NPPF), and then consider the area in light of qualitative assessments of character. This will then inform whether a score should be revised. As such, both qualitative and quantitative assessments will be</p>

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	<p>2015 which offers much helpful clarification regarding the five purposes of the Green Belt within the context of identifying land to be used for development through the local plan.</p> <p>Review of Boundaries</p> <p>3.3 As referenced in the Green Belt Methodology, Paragraph 49 of the Framework stresses the importance attached by Government to the Green Belt as a means of preventing urban sprawl by keeping land permanently open. However, Paragraph 83 clearly allows Green Belt boundaries to be altered in "exceptional circumstances" when it states that:</p> <p>"Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period".</p> <p>3.4 Paragraph 84 goes on to make it clear that when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development and further requires consideration of the consequences of channelling development towards non-Green Belt locations. Paragraph 85 seeks (amongst other matters) consistency with the strategy for meeting identified requirements for sustainable development.</p> <p>3.5 Planning Practice Guidance ("PPG") (Paragraph: 045 Reference ID: 3-045-20141006) stresses the importance that Government attaches to protecting the Green Belt. It states that the Framework should be read as a whole: need alone is not the only factor to be considered when drawing up a local plan. It indicates that when considering how to meet the identified need, constraints such as Green Belt may restrain the ability of an authority to meet its housing need.</p> <p>3.6 Fundamentally however, the most appropriate land for development must be identified and allocated through a local plan. In order to justify the use of Green Belt land for development through the local plan any assessment needs to take account of sustainability issues.</p> <p>3.7 Clearly the Council accepts that significant weight should be given to the protection of the Green Belt, but that greater weight</p>	<p>16.11 We are pleased to note the reference to a "flexible approach to the identification of parcels" at Page 27 of the Methodology which includes consideration of additional durable boundary features</p> <p>16.12 Any subdivision of Green Belt for assessment purposes which disregards features such as class C road would be unjustified. Failure to have regard for these smaller features would give rise to concerns about the scale of land parcels and how they will ultimately be assessed. This is of concern where the Green Belt is fragmented. Using a set of criteria which is too inflexible would run the risk that land parcels are drawn too generously, encompassing smaller areas within them, which do not perform well against Green Belt purposes and could therefore be considered for release.</p> <p>16.13 It is imperative that the methodology recognises the fragmented nature of Green Belt in Spelthorne and goes beyond the generic and responds directly to this challenge. Given the nature of the area, defining tightly drawn land parcels for further consideration against Green Belt purposes.</p> <p>16.14 Purpose 1: It is clear that Ashford, Sunbury Cross and Stanwell form a single built up area. However how other settlements, most notably Sunbury-on-Thames is less clear. Further clarification is required regarding boundaries of 'large built up areas' so that it can be determined whether sites on the more peripheral edges of settlements are deemed to play any intrinsic role in terms of preventing the sprawl of large built up areas.</p> <p>16.15 Purpose 2: The methodology acknowledges at section 4.4.2 that there is no guidance in national policy over what might constitute 'towns' and whether this purpose should also go on to take into consideration the gaps between smaller settlements.</p> <p>16.16 We consider NPPF para 80 is clear that Green Belt serves to prevent the merging of towns. Whilst it does not go on to define 'town', the</p>	<p>undertaken and will reflect upon the area's character using multiple measures.</p> <p>16.22- Site visits and the qualitative assessments of character will determine whether a score needs revision from that initially determined by the level of built form present. This will enable a balanced approach so that the most appropriate score can be provided. This will include consideration of matters such as sense of enclosure by built form, urbanising influences, visual separation from the wider Green Belt etc.</p> <p>16.23- This is considered relevant to Spelthorne given the importance that the Green Belt had in contributing to the city's historic setting and character. Given that Purpose 4 relates to preserving the setting and special character of historic towns and the number of conservation areas in Spelthorne, the Oxford example illustrates how important the relationship between the fringes of settlements and the surrounding Green Belt is in the contribution of a Local Area to this purpose.</p> <p>16.24- Although somewhat dated, the Conservation Area Appraisals are still considered to illustrate the character of the conservation areas in Spelthorne and their value.</p> <p>No changes to be made.</p>

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	<p>should be given to the need to significantly boost housing supply (as required by the Framework at Paragraph 47) where it is sustainable to do so and having taken account of how the Green Belt in Spelthorne performs against its purposes as well as its overall function and capacity. The resultant Arup work is intended to identify any land that performs weakly against Green Belt purposes and could therefore be considered for release.</p> <p>3.8 We note and welcome the references to relevant case law and examples in this regard contained within the Green Belt Methodology at Section 3.1.4 including the Solihull Local Plan and the case of Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council.</p> <p>3.9 Whilst not explicitly clear from the text within the Green Belt Methodology, we assume that the Solihull Local Plan case referred to is the recent High Court judgement in the case of Gallagher Homes Limited v Solihull Metropolitan Borough Council [2014] EWHC 1283 (Admin). The Gallagher Homes case makes it clear that the test of exceptional circumstances is "a very stringent one" and that whilst each case is fact sensitive, the question of whether circumstances are exceptional requires an exercise of planning judgement.</p> <p>3.10 We would also add that the High Court Decision in the case of St Albans v Hunston Properties Ltd [2013] EWCA 1610 set out beyond any doubt the principle that housing (or employment need) can be an exceptional circumstance justifying a review of Green Belt boundaries when it states that:</p> <p>"Having identified the full objectively assessed needs figure the decision maker must then consider the impact of the other policies set out in the NPPF. The Green Belt policy is not an outright prohibition on development in the Green Belt. Rather it is a prohibition on inappropriate development in the absence of very special circumstances"</p> <p>3.11 We therefore support the justification within the Green Belt Methodology for this exercise to be undertaken.</p> <p>4.0 Methodology</p> <p>4.1 We support the acknowledgement of the broad principles underpinning a review of Green Belt boundaries contained within the Framework i.e. that they can only be reviewed through a</p>	<p>wording does not include reference to the merging of all 'settlements' as now proposed by the methodology.</p> <p>16.17 Whilst a land parcel may play a role in maintaining a gap between built up areas, it should not be deemed to perform strongly against the purposes of the Green Belt if it does not clearly play a role in preventing towns from merging.</p> <p>16.18 Figure 4.4 lists the various settlements contained in Purpose 2. The implication is that each settlement is being treated as a single entity with regard to the merging of settlements although the methodology should clarify whether this understanding is correct. We would support this approach on the basis that these existing built up areas are already virtually contiguous.</p> <p>16.19 Lower Halliford cannot be considered a 'town' as required by para 80 of the NPPF. Any development between Lower Sunbury and Lower Halliford cannot be seen to fall foul of para 80 point 2 in so far as it relates to merging.</p> <p>16.20 In terms of the different types of 'gaps' set out in Purpose 2, we do not object to the generic reference to 'settlements' within this context which, for the reasons outlined above, is clearly contrary to the requirements of NPPF para 80.</p> <p>16.21 Purpose 3: We consider it is important that the test is not limited simply to a two-dimensional assessment of built form as a percentage of land area with a qualitative assessment following. The openness of the Green Belt clearly cannot be assessed entirely in these simplistic terms. It is essential that a more holistic view of existing development is taken including, most notably, consideration of the height, mass, design and siting of existing buildings or structures.</p> <p>16.22 We consider that the four land use definitions from 'urban character' to 'strong unspoilt rural character' determined by percentage of built form, could artificially skew the results where substantial built form occupied a relatively modest area of land.</p>	

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	<p>Local Plan and that they should be defined using permanent and recognisable physical features which are consistent with the Framework at Paragraphs 80 and 83. We also accept the comments contained within the Methodology at Paragraph 3.6 where it discusses the lack of a standardised methodology for Green Belt reviews, suggesting that as a consequence, the onus is on each authority to develop a methodology which is appropriate to the local context.</p> <p>4.2 Under such circumstances, we would expect the review methodology to be informed by PAS guidance on Green Belts and to have regard to the methodology underpinning previous reviews of the Green Belt, particularly those previously undertaken within Surrey. With that in mind we welcome the acknowledgement and summary of the most up-to-date PAS guidance at section 3.6 which we consider to be accurate and the summary of Green Belt reviews undertaken at adjoining authorities at Table 3.1.</p> <p>4.3 The Methodology section at 4.1 goes on to outline that because the Green Belt in Spelthorne was largely imposed around existing built development it resulted in irregular and jagged edges. As a result, the Methodology suggests that it is relevant to consider the performance of the Green Belt at two different scales:</p> <ul style="list-style-type: none"> • Strategic Assessment - focussing on the primary purpose of wider functional areas of Green Belt in the Borough and their role within the wider sub-regional context of the Metropolitan Green Belt. • Local Assessment - which will consider whether smaller areas fulfil the Green Belt purposes, as set out in the NPPF. <p>4.4 Two strategic areas have been identified, Strategic Area A covering largely the eastern half of the borough and Area B, the western half. Whilst we question the usefulness of this exercise, we do not object to it.</p> <p>4.5 The smaller land parcels identified through the Local Assessment are yet to be identified. However, it is confirmed as section 4.2.2 that they will be based on permanent and defensible boundaries, both natural and man-made including:</p> <ul style="list-style-type: none"> o Motorways; o A and B Roads; o Railway Lines; and o Rivers, brooks and reservoirs. 	<p>16.23 Purpose 4: We question the appropriateness of the comparison with Oxford, which is wholly different to Spelthorne in terms of character, scale and geography.</p> <p>16.24 Great weight has been placed on Conservation Area Appraisals, however the most recent dates from 1992. We therefore question the validity of relying on this assessment given the amount of development that has taken place since and wider changes in policy.</p> <p><u>Conclusion</u></p> <p>16.25 It is clear that Spelthorne Borough Council will need to undertake a full Green Belt review and release Green Belt land through the emerging Local Plan in order to meet a higher proportion of its objectively assessed housing need as required by the Framework at Paragraphs 14 and 47.</p> <p>16.26 Croudace Homes largely supports the proposed Green Belt Methodology subject to a number of concerns regarding principally:</p> <ul style="list-style-type: none"> • the identification and definition of large urban areas, • the assessment of towns with regard to merging rather than a generic assessment of settlements, • the simplicity of the proposed assessment of existing built form, and the age of the evidence base underpinning an assessment of historic character 	

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	<p>4.6 Whilst we support the principle behind defining land parcels around strong defensible boundaries we are pleased to note the reference to a "flexible approach to the identification of parcels" at Page 27 of the Methodology which includes consideration of additional durable boundary features including unclassified roads and private roads as well as other features such as canals, embankments and protected woodland or hedgerows.</p> <p>4.7 The accompanying Vision Document highlights the importance of this approach. The site controlled by Croudace Homes at Fordbridge Road is bound to the north by Halliford Road and by Fordbridge Road to the south. The Framework at Paragraph 83 is clear that "authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period".</p> <p>4.8 Furthermore, Paragraph 85 states that when defining Green Belt boundaries, local planning authorities should:</p> <ul style="list-style-type: none"> • Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and • Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. <p>4.9 Both Halliford Road and Fordbridge Road are classified C roads. However, it is clear that they meet all relevant tests as set out in the Framework with regard to permanence. As such, any sub-division of the Green Belt for assessment purposes which disregards such features would be unjustified.</p> <p>4.10 Failure to have regard to these smaller features would also give rise to concerns about the scale of the land parcels that will ultimately be assessed. This is of particular concern where, as acknowledged elsewhere in the methodology, the Green Belt is particularly fragmented forming as it does something of a transition between London and the more open Surrey countryside beyond. To designate land parcels using a set of criteria which is too inflexible would run the risk that land parcels are drawn too generously, encompassing smaller areas within them which, in isolation, do not perform well against Green Belt purposes and could therefore be considered for release.</p> <p>4.11 We therefore consider it to be imperative that the Green Belt Methodology not only recognises the fragmented nature of</p>		

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	<p>Green Belt in Spelthorne but produces a methodology which is beyond the generic and responds directly to this challenge. Given the nature of the area, this surely can only be done by defining tightly drawn land parcels for further consideration against Green Belt purposes.</p> <p>4.12 The proposed methodology goes on to outline that the identified land parcels will be assessed against each of the Green Belt purposes in turn, with each purpose carrying an identical amount of weight, an approach we consider to be justified.</p> <p>Purpose 1 - To Check Unrestricted Sprawl of Large Built up Areas</p> <p>4.13 The text at 4.4.1 outlines that whilst the Green Belt in Spelthorne was originally intended to restrict the sprawl of London, it now functions as a way of preventing the merging of large built up areas across the borough. It goes on to list the urban areas of Spelthorne and includes Sunbury-on-Thames.</p> <p>4.14 The supporting text confirms that Ashford and Sunbury Cross along with Stanwell form one continuous built up area and as such will be treated as a single urban area for the purposes of the Assessment. However, how the boundaries of other settlements, most notably Sunbury-on-Thames, are to be defined for the purposes if this assessment is less clear. As such, further clarification regarding the defined boundaries of 'large built up areas' would be helpful so that it can be determined whether sites on the more peripheral edges of settlements are deemed to play any intrinsic role in terms of preventing the sprawl of large built up areas.</p> <p>Purpose 2 - To Prevent Neighbouring Towns from Merging</p> <p>4.15 Bullet point 2 of the Green Belt purposes outlined at Paragraph 80 of the NPPF outlines that the Green Belt function includes the prevention of towns from merging. The Green Belt Methodology acknowledges at Section 4.4.2 that there is no guidance within National Policy over what might constitute 'towns' and whether this purpose should also go on to take into consideration the gaps between smaller settlements. The Methodology therefore suggest that "Given the non-constrained nature of development in Spelthorne, the Assessment of Local Areas considers gaps between all non-Green Belt settlements".</p>		

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	<p>4.16 However, we consider that the wording of the Framework at Paragraph 80 is clear in as much as that the Green Belt serves to prevent the merging specifically of towns. Whilst it does not go on to define the meaning of the word town, the wording specifically, and we can only assume deliberately, does not include a reference to the merging of all "settlements" as now proposed by the methodology.</p> <p>4.17 Whilst a land parcel may play a role in maintaining a gap between built up-areas, it should not be deemed to perform strongly against the purposes of the Green Belt if it does not clearly and explicitly play a role in preventing towns from merging. To assess the role a land parcel plays in preventing the merging of even the smallest of settlements is contrary to both the wording and the spirit of the Framework at Paragraph 80.</p> <p>4.18 The Green Belt Methodology at Table 4.4 lists the settlements considered in the purpose 2 Assessment including Staines-upon-Thames, Upper Halliford, Laleham and Littleton. It also lists Ashford / Sunbury-on-Thames / Stanwell / Shepperton and Lower Halliford as a separate entry. The implication therefore is that this area is being treated as a single entity with regard to the merging of settlements although the Methodology should clarify whether this understanding is correct.</p> <p>4.19 We would support this approach (and indeed would insist that it is taken) on the basis that these existing built up areas are already virtually contiguous. Whilst it may be desirable to retain any existing open spaces between them for other reasons, the merging of these settlements has in effect already taken place.</p> <p>4.20 Furthermore, we certainly do not consider that Lower Halliford would meet the definition of a 'town' as required by the Framework at Paragraph 80 when considering the purpose of the Green Belt. As a consequence any development between Lower Sunbury and Lower Halliford cannot be seen to fall foul of Paragraph 80 bullet point 2 in so far as it relates to merging.</p> <p>4.21 The Methodology also suggests that the three types of gaps between "settlements" have been identified:</p> <ul style="list-style-type: none"> • Essential Gaps - where development would significantly reduce the perceived or actual distance between settlements; • Wider Gaps - which may be less important for preventing coalescence; • Less Essential Gaps - where development is likely to be possible without any risk of coalescence between settlements. 		

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	<p>4.22 Whilst we do not have any fundamental objection to classifying the importance of gaps in this way, we do object to the generic reference to 'settlements' within this context which, for the reasons outlined above, is clearly contrary to the requirements of the Framework at Paragraph 80.</p> <p>Purpose 3 - To Assist in Safeguarding Countryside from Encroachment</p> <p>4.23 The Methodology proposes that in order to assess the performance of a land parcel against purpose 3, the percentage of built form within the Green Belt Local Area will be calculated using GIS tools. The calculation will be based on the amount of manmade features including inter alia buildings, surfaced areas, infrastructure and miscellaneous structures. It suggests that the score attributed will be initially determined on the basis of built form but scores will then be considered further in light of qualitative assessments of character.</p> <p>4.24 We consider it is important that the test is not limited simply to a two-dimensional assessment of built form as a percentage of land area. The openness of the Green Belt clearly cannot be assessed entirely in these simplistic terms. It is essential that a more holistic view of existing development is taken including, most notably, consideration of the height, mass, design and siting of existing buildings or structures. Clearly substantial buildings or structures may have a minimal footprint but due to their height or mass, or indeed their design or siting could have a significant impact on Green Belt openness. Conversely low level, squat structures could occupy a large area of land could have an impact on openness which is minimal for precisely the same reasons.</p> <p>4.25 The Methodology goes on to identify four land use definitions ranging from "Urban Character" to "Strong Unspoilt Rural Character". Classification of a land parcel within these categories is heavily determined by the percentage of built form (ranging of 3-20%) which for the reasons outlined above we consider could artificially skew the results where substantial built form occupies a relatively modest area of land.</p> <p>Purpose 4 - To Preserve the Setting and Special Character of Historic Towns</p>		

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	<p>4.26 The Green Belt Methodology quite rightly points to PAS guidance "Planning on the doorstep the Big Issues - Green Belt (2015) which suggests that assessment of this purpose relates to very few settlements in practice because of the way that modern development often envelops historic towns.</p> <p>4.27 However, the Green Belt Methodology makes a particular reference to the relationship between the fringes of settlements and the surrounding Green Belt in terms of preserving the setting of historic areas. It points specifically to the example of a Green Belt Review prepared by Oxford City Council in 2014 which identified traits of the surrounding countryside that contributed to the City's special character and historic setting.</p> <p>4.28 Clearly, the City of Oxford is wholly different to Spelthorne in terms of character, scale and geography. Oxford being a substantial city with a large historic centre containing numerous Listed Buildings of National Significance as well as a substantial Conservation Area. Spelthorne contains relatively modest and well dispersed Conservation Areas which are wholly different in terms of scale and significance. We therefore question the appropriateness of the comparison.</p> <p>4.29 The Methodology goes on to list the geographical areas which are relevant for assessment against reason 4 including Lower Sunbury and Lower Halliford. We raise no objection to the list. However, the text goes on to suggest that</p> <p>"In the cases of Laleham and Lower Sunbury, it is considered that there is potential for a significant relationship between the historic core of these settlements (as defined by the Conservation Area Appraisals) and the adjoining Green Belt (the relationship between the Green Belt and the built-up area is specifically referred to in the Conservation Area Appraisals)".</p> <p>4.30 It is clear that great weight is placed on Conservation Area Appraisals in coming to this conclusion. However, the most recent Conservation Area Appraisal for Lower Sunbury dates from 1992. Some 24 years ago. We therefore question the validity of relying on this assessment given the amount of development that has taken place in the intervening period and wider changes in policy.</p> <p>4.31 The Methodology goes on to suggest that assessment against this purpose will be based on the role the parcel plays in "providing immediate context for development" and the</p>		

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	<p>"contribution to views or vistas between the historic settlement and the surrounding countryside". It also suggests that the relative importance of particular landforms or features in terms of setting will be judged using the relevant Conservation Area Appraisals. This reinforces our concerns regarding the age of the Appraisals that underpin this approach.</p> <p>Purpose 5 - To Assist in Urban Regeneration by Encouraging the Recycling of Derelict and Other Urban Land</p> <p>4.32 Given that the proposed assessment is only of relevance in the context of planned urban regeneration schemes we have no objection.</p> <p>5.0 Conclusion</p> <p>5.1 In conclusion, it is clear that Spelthorne Borough Council will need to undertake a full Green Belt review and release Green Belt land through the emerging Local Plan in order to meet a higher proportion of its objectively assessed housing need as required by the Framework at Paragraphs 14 and 47. We consider that adequate justification has been referenced for this approach, including relevant case law, and that this approach would meet the test of exceptional circumstances.</p> <p>5.2 However, it is important to have a robust methodology that will assess effectively all Green Belt land across the borough.</p> <p>5.3 Croudace Homes largely supports the proposed Green Belt Methodology subject to a number of concerns regarding principally:</p> <ul style="list-style-type: none"> • The identification and definition of large urban areas, • The assessment of towns with regard to merging rather than a generic assessment of settlements, • The simplicity of the proposed assessment of existing built form, and the age of the evidence base underpinning an assessment of historic character. <p>5.4 Subject to addressing these issues Croudace would lend full support to the proposed Methodology.</p>		
00029/2/001	<p>Mole Valley District Council No Comments to Make</p>	<p>17. Mole Valley District Council No comments to make.</p>	<p>Noted.</p> <p>No changes required.</p>
00030/2/001	<p>Reigate & Banstead Borough Council</p>	<p>18. Reigate & Banstead Borough Council</p>	<p>Noted.</p>

Comment Ref No	Verbatim Comment	Summarised Comment	SBC Response
	Having reviewed, we have no comments on the proposed approach and note that it is broadly consistent with the methodology adopted in our own recent Green Belt Review.	We have no comments to make and note that it is broadly consistent with the methodology adopted in our own recent Green Belt Review.	No changes required.
00043/8/001	<p>Historic England I refer to your email of 10 October requesting comments on three documents:</p> <ul style="list-style-type: none"> · Green Belt Assessment Draft Methodology · Sustainability Appraisal/ Strategic Environmental Assessment Draft Scoping Report · Spelthorne Functional Economic Area Analysis Draft Report <p>I am writing to confirm that at this stage Historic England has no comments to make on the above documents.</p>	<p>19. Historic England No comments to make.</p>	<p>Noted.</p> <p>No changes required.</p>