

**Spelthorne Borough Council**

**Site Selection Methodology**

**Table of Comments and Council Response**

**February 2019**



## **Introduction**

Spelthorne Borough Council consulted on the Draft Site Selection Methodology from 17 December 2018 to 28 January 2019. A summary of each representation and the Council's response are set out in the following table.

Rep No	Representor	Summary of comments made	Officer response
001	Geoff Sheehy	<p>Regarding Kempton Park, part of the plot is an area of Special Scientific Interest and should warrant a mention and an upgrading of its importance. It should therefore count under ““Protects land which provides immediate and wider context for historic settlement, including views and vistas between the settlement and the surrounding countryside”. [purpose 4 Green Belt Assessment]</p> <p>Whilst not specifically covered in the above I would assume that it is as important as and more difficult to safeguard than bricks and mortar.</p>	<p>This comment relates to the Green Belt Assessment Stage 2 methodology. This is therefore considered beyond the scope of the consultation.</p> <p>Green Belt performance will be assessed through the site selection process and due regard will be given to the Green Belt Assessment findings. Due consideration will also be given to nature conservation designations.</p>
002	Ashford Sports Club	<p>The plot of land promoted by Ashford Sports club is still available for development and nothing has changed.</p>	<p>Noted.</p>
003	Natural England	<p>Natural England does not consider that this site selection methodology document poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.</p> <p>The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. The Local Planning Authority should fully take account of any environmental risks and opportunities relating to this document.</p>	<p>Noted.</p>

Rep No	Representor	Summary of comments made	Officer response
004	Lower Sunbury Residents Association (LoSRA)	We have considered the proposed SSM in detail and are generally supportive of it. It would be helpful to have more detail on how the methodology will be applied to, and implemented on individual sites.	The SSM will be applied to individual sites in due course. A detailed commentary will be provided as to the reasoning behind the assessment of each site.
005	Wood, on behalf of National Grid	The consultation document has been reviewed and no comments made.	Noted.
006	Nicola Rogers	I would like to see a clear list of proposed development sites.	The Strategic Land Availability Assessment (SLAA) identifies the proposed development sites in the Borough. This included sites located in the Green Belt which can be viewed in Appendix 3. The 2018 SLAA is available on the website and the 2019 SLAA will be published in due course setting out any newly identified sites. The Site Selection Methodology (SSM) details how sites will be identified for assessment.
007	Transport for London	TfL is working closely with Network Rail in developing plans for Crossrail 2. TfL is therefore interested in ensuring the wider economic benefits can be maximised by focusing new development, and increasing development densities, in locations that are highly accessible to rail stations. We therefore support part 2d of the method which seeks to score sites in accessible locations higher than others.	Noted.

Rep No	Representor	Summary of comments made	Officer response
		<p>We request that in stage 2d sufficient consideration is given to potential increased frequency of train services as a result of Crossrail 2.</p> <p>We also recommend that during stage 4c you identify higher capacities on well located sites as a result of improved transport services including Crossrail 2. This will be in line with the NPPF which seeks to locate development where the use of sustainable transport can be maximised and also reflects your Local Plan objective to 'increase densities in town centres and near transport facilities'.</p>	<p>Noted. Stage 2a of the SSM sets out that consideration will be given to the opportunities for higher density development, where appropriate, which includes transport hubs. Regard will be given to the presence and potential of supporting infrastructure through stage 2d, in line with NPPF para 122. The development of the Crossrail 2 scheme is still in the early stages therefore the impacts are still largely unknown. The Council will continue to engage on proposals and will take account of progress as it occurs. The Council will also continue to engage with Transport for London and National Rail to keep them informed of developments that progress through the site assessment work that could impact on the route.</p> <p><b>Text to be added to stage 2d to clarify how existing and proposed transport infrastructure will be considered.</b></p> <p><b>Para 7.7 of Stage 4c to be updated to refer to the location and character of an area in determining capacity.</b></p>
008	Iceni, on behalf of Diocese of London	<p>1. The Diocese of London are promoting a 3.6ha site, Grange Farm located east of Upper Halliford Road.</p>	<p>1. Noted.</p> <p>2. Noted. The Council will undertake its own objective assessment of each proposed site.</p>

Rep No	Representor	Summary of comments made	Officer response
		<p>2. Included alongside our review of the methodology is an assessment of Grange Farm using the draft methodology.</p> <p>3. The current methodology is fairly opaque in that it does not necessarily respond clearly to the NPPF. We propose the Council adopt the Sustainable Development Scorecard (<a href="https://thescorecard.org.uk/">https://thescorecard.org.uk/</a>). Sites are analysed so that results are tuned to a site's location and specific development proposals so users can be sure that the assessment is bespoke to each development. This allows for a more objective and consistent assessment approach.</p> <p>4. Stage 1a – it is unclear what role the SLAA plays in the assessment process. We suggest the conclusions on the SLAA are put to one side and the assessment begins with assessing absolute constraints.</p> <p>5. Stage 1b – although we consider this stage broadly acceptable, we suggest that a site's proximity to a settlement should be a site which adjoins an identified built up settlement rather than sites which fall within or adjoin a 250m buffer around a settlement.</p>	<p>3. Noted. The proposed approach is considered to sufficiently consider the sustainability of each site. This is largely through stage 2d and the Sustainability Appraisal stage. In addition, in some cases it is not yet known what is specifically being proposed on particular sites, therefore not all information is available at this stage. The proposed approach is considered to take account of local circumstances, ensuring a consistent approach to provide a robust, logical and objective assessment of each site, in line with the NPPF.</p> <p>4. The SLAA will be used as a starting point for the identification of sites. The SLAA is a technical document and is not the evidence which considers which sites perform more strongly or sustainably for allocation. It is acknowledged that this is a separate process and has regard for a number of different factors. <b>Text to be added to clarify how the SLAA will be used.</b></p> <p>5. The use of a 250m buffer around a settlement is considered to sufficiently allow for the consideration of sustainable development. This also aligns with the approach taken in the Green Belt Assessment Stage 2.</p>

Rep No	Representor	Summary of comments made	Officer response
		<p>6. Although it is appropriate to filter sites by size within the settlement boundary, we consider it inappropriate to filter those outside as this could exclude potentially sustainable sites at an early stage of the process due to their size alone. This should be clarified in the final version of the text. Clarification required on filtering sites by size.</p> <p>7. Sustainability Appraisal – the SA fails to generate an objective and qualitative result. Clarification on the role of the SA required in the assessment process. Some of the SA objectives will not apply to every site, but more appropriately to wider strategic site options. Some of the SA objectives are difficult to assess at this early stage of the planning process such as improving water quality. The SA fails to set out clear parameters to assess sites effectively and does not provide a robust analysis to fairly discard sites at this stage. We recommend that this stage is scrapped.</p> <p>8. Stage 2a – we consider it inappropriate to use specific identified needs and opportunities for mixed use development as factors which determine if a site is suitable. Clarification required on 'other benefits'.</p>	<p>6. All sites within or adjacent to the 250m buffer, located within the Green Belt, will be considered through the site selection process regardless of their size.</p> <p>7. Point noted however it is considered that the methodology will allow for a robust and objective assessment. The Strategic Planning team will engage with relevant departments within the Council to gain specialist input to ensure that a robust and objective assessment is undertaken. It is agreed that detail is not yet known on some sites at this stage, however the SA framework is considered sufficiently robust enable an appropriate level of assessment of sustainability at this stage. SA is considered an important stage of the plan making process as it is iterative and aims to improve the sustainability of the plan. <b>Clarifying text to be added to para 4.4.</b></p> <p>8. As stated in para 5.3, the list included is indicative of the type of factors to be used. It is acknowledged that each of the factors mentioned will not be applicable to every site therefore consideration will be given to the extent to which they apply. <b>Additional clarifying text to be added.</b></p>

Rep No	Representor	Summary of comments made	Officer response
		<p>9. Stage 2b &amp; 2c – factors are considered appropriate.</p> <p>10. Stage 2d – it is unclear how nationwide sustainability criteria will be made appropriate for local circumstances. The strategy fails to consider whether a site will provide any of these facilities.</p> <p>11. Stage 3a – the Green Belt Assessment stage 1 is inappropriate as part of the site selection process as the methodology needs to assess smaller parcels. The use of the Green Belt Assessment stage 2 at this stage is also inappropriate as it is yet to be published and will need to be critiqued. This is a key element of the methodology and raises questions about the credibility of the methodology as a whole.</p> <p>12. Stage 3b – we support allocating brownfield sites in principle but this needs to be considered against a site's location. A second scoring system is needed to determine whether a site is sustainably located based on what was drawn upon in the Location Character Assessment Criteria in stage 2.</p> <p>13. Stage 3c – there appears to be a doubling up with Green Belt Assessment Stage 2. This stage of the assessment seems broadly</p>	<p>9. Noted.</p> <p>10. The included criteria are considered appropriate for assessing sustainability of a location. As stated in para 5.17, the assessment will give consideration to the opportunity each site provides to improve connectivity. <b>Text to be updated to cover wider infrastructure provision.</b></p> <p>11. The assessment of Green Belt will be informed by the Stage 1 assessment at the wider level as well as the Stage 2 assessment to consider the detail of each site. Although the Council has not yet published the Green Belt Assessment stage 2 this is considered a key evidence document and has been robustly and objectively developed by consultants, using a methodology in line with that of other local authorities. It is therefore considered appropriate to include it.</p> <p>12. The whole assessment process is considered to sufficiently consider a site's location and overall sustainability. The results of each assessment stage will be combined and considered jointly to consider the overall performance of a site through stage 4a.</p>



Rep No	Representor	Summary of comments made	Officer response
		<p>acceptable in principle but there needs to be a clearer set of parameters of how the importance of viewpoints will be assessed.</p>	<p>13. Whilst the Green Belt Assessment will help to inform this stage, the visual dimension of openness in the study does not exhaust all relevant planning considerations relating to visual impact. It is therefore considered appropriate to assess this in more detail. The assessment process set out is considered to be appropriately detailed, particularly using the parameters set out in para 6.24 and 6.25. Assessment of visual amenity is considered a largely qualitative topic therefore commentary will be provided to support conclusions.</p>
009	<p>Montagu Evans, on behalf of Aberdeen Standard Investments</p>	<p>We are keen to bring our client's interests to the Council's attention as part of the process of preparing the new Local Plan. Annandale House, Sunbury, is owned promoted by the landowner.</p> <p>We trust that the site will be given due consideration in the Council's assessment process.</p> <p>Opportunities exist to consider alternative forms of development on site.</p>	<p>Noted. No comments received specifically on the methodology. All sites will be considered appropriately through the site selection process.</p>
010	<p>Montagu Evans, on behalf of Brett Aggregates</p>	<p>1. Overall we support the approach outlined in the methodology.</p>	<p>1. Noted.</p>

Rep No	Representor	Summary of comments made	Officer response
		<p>2. We note that some criteria, e.g. Table 5 – Location Assessment Criteria, appear to be more appropriate to the consideration for residential use than employment use. Applying the same criteria across all land uses could disadvantage locations that might be eminently suitable for employment use but not for residential use.</p> <p>3. It must also be borne in mind that large developments can be required to provide sustainable transport measures through the planning system and employees can be incentivised to use them. Opportunities should be taken into account.</p> <p>4. The use of the Green Belt Assessment should be a starting point and the methodology ought to consider a more specific approach to the consideration of sites. The conclusions/ recommendations in the GBA ought to be reviewed in the light of more recently published information.</p> <p>5. Flood mapping has now changed, particularly regarding parcel 27 and AC-12 and the 2009 Proposals map. Supplementary information should be used to inform assessments to ensure that they are accurate.</p>	<p>2. As stated in para 5.16 the scoring of each site will be accompanied by a qualitative assessment to provide additional commentary and where there may be exceptions to the broad principles of the assessment process. <b>Additional text to be added to clarify the potential impacts of different uses.</b></p> <p>3. Para 5.17 notes that consideration will be given to the opportunity each site provides to improve connectivity.</p> <p>4. Stage 3 of the Assessment will consider the findings of the Green Belt Assessment and will help the Council to reach conclusions. As stated in para 6.10, a professional judgment will be made, based on the evidence, on the merits of each site in selecting which sites to take forward. Stage 3 of the assessment is not just limited to the GBA results but considers other factors. Conclusions from each stage of the assessment will be brought together to inform a site's overall performance.</p> <p>5. The most available up to date evidence will be used to inform the site assessments, including flood mapping.</p>

Rep No	Representor	Summary of comments made	Officer response
		<p>6. The Green Belt Assessment resulted in the assessment of a wide variety of parcel sizes. There may be smaller areas that are suitable for further consideration. A further layer of consideration is required.</p>	<p>6. Stage 3 of the assessment will refer to both stage 1 and stage 2 of the GBA, therefore considering smaller parcels.</p>
011	Heatons, on Behalf of Tarmac	<ol style="list-style-type: none"> <li>1. Landowner of Home Farm, Laleham. Initial strategic options developed for the site, incorporating recreation uses, blue and green infrastructure and open space.</li> <li>2. The SSM does not constitute a sound basis for the appropriate identification and allocation of sites.</li> <li>3. Stage 2a – para 5.1, bullet 2 should be extended to cover the ‘quality and value’ of a site, rather than simply whether it is sustainably located or PDL. The factors considered are too reductive and discourage mixed use as they focus on solely meeting needs for employment and housing. Need to consider the wider benefits of releasing and enhancing Green Belt land through open space provision; increased recreational value; flood risk mitigation; long term environmental enhancements.</li> <li>4. Stage 2c – need more clarity in the scoring of sites regarding Table 4.</li> </ol>	<ol style="list-style-type: none"> <li>1. Noted.</li> <li>2. Noted. The SSM is considered a robust and logical approach to assessment.</li> <li>3. Para 5.2 sets out the summary of the option agreed with members. It is through this site selection process that further consideration will be given to a range of factors, including the quality and value of each site, particularly through Stage 2 of the assessment.</li> </ol> <p>Para 5.3 provides an indicative list of considerations relating to the spatial strategy. <b>“Other benefits provided by the site” to be amended to refer to the potential environmental gains.</b> “Opportunities for infrastructure provision” refers to a range of infrastructure, including but not limited to transport, health and community. Opportunities for the provision of open space is included in Stage 2c.</p>

Rep No	Representor	Summary of comments made	Officer response
		<p>5. Stage 2d – we suggest scoring sites is based on guidance rather than desirable distances.</p> <p>6. Stage 3a – it is stated that the Green Belt Assessment Stage 2 has resulted in sites being sifted out. The report is at a draft stage and has not been published, nor is it available to review on request. It has influenced the SSM, so much that para 6.4 of the methodology directly references paragraphs of the Stage 2 assessment for further clarity of constraints considered (para 3.25). It would be beneficial for stakeholders to have sight of this document as it has clearly informed the SSM and would maximise the benefit of consultation.</p> <p>7. Para 6.11 states that a qualitative assessment will be provided “to take account of any other considerations” but this requires more clarity. There is no direct recognition of the opportunities for enhancing the value of Green Belt land, for instance, through public access and recreational use. Stage 3a encompasses a reductive view based solely around built development.</p> <p>8. Stage 3c – there is no regard given to existing baseline conditions published at a strategic</p>	<p>4. The table included is considered to sufficiently set out how sites will be assessed. <b>Additional supporting text be provided.</b></p> <p>5. The distances used are considered appropriate. The available guidance, particularly IHT, 2000, has been used to inform the approach used. This acknowledges the difference between desirable and preferred maximum distances and this has been reflected in the scoring system employed. Para 5.16 states that commentary will be provided to expand on the scoring used and identify where there may be exceptions.</p> <p>6. Para 6.4 does not quote the GBA2, although the section referred to is set out in the GBA stage 2 methodology, available online. Para 3.25 referred to is a reference to an earlier paragraph in the SSM however this was a typing error. <b>Correct para 3.25 to para 3.24.</b></p> <p>The Council will publish the Green Belt Assessment Stage 2 when it consults on its Preferred Options Local Plan. This is to ensure that it can be viewed in the wider context of the emerging Plan. The</p>

Rep No	Representor	Summary of comments made	Officer response
		<p>level, for example the Surrey Landscape Character Assessment (2015).</p>	<p>consultation period will be extended accordingly.</p> <p>7. Noted. Stage 2c of the assessment is considered to adequately consider the potential to enhance open space and recreation value. Stage 3a is only one stage of the assessment. When considered alongside other stages, particularly in stage 4a, including 2a on the spatial strategy and 2c on open space, these factors are duly considered. <b>Supporting text to be added to clarify para 6.11, with reference to para 138 of the NPPF.</b></p> <p>8. Noted. <b>Reference to be made to strategic level evidence where available, particularly in Stage 2b on non-absolute constraints, such as Landscape Character Assessments (2015) and Biodiversity Opportunity Areas.</b></p>
012	Surrey County Council	<p><b>Flooding</b> In addition to para 3.23, Surrey County Council recommend that the risk from surface water and ground water be considered when scoring sites under the stage 1 assessment to flood risk.</p> <p><b>Heritage</b></p>	<p>Noted. Stage 2b and Table 3 set out how flood risk will be considered. <b>Consideration to be given to surface water and ground water flooding.</b></p> <p>Noted. The NPPF (para 194) states that harm or loss of assets of the highest significance,</p>

Rep No	Representor	Summary of comments made	Officer response
		<p>Surrey County Council recommend that Scheduled Monuments and Grade 1 listed buildings be added to the list of absolute constraints within stage 1 of the assessment. This would avoid sites reaching a later stage where such sites or structures are situated. We acknowledge that Table 2b recognises heritage as a non-absolute constraint.</p>	<p>including scheduled monuments, and grade I and II* listed buildings, should be wholly exceptional. As such consideration will be given to whether the potential impacts and any harm can be overcome. The impact of development on the setting of all other designated and non-designated heritage assets will be considered at stage 2b. Para 5.6 notes that a qualitative assessment will take place to assess the significance of impacts. <b>Specific reference to be made to para 194 of NPPF in Table 3.</b></p>
013	CBRE, on behalf of CBRE Global Investors	<ol style="list-style-type: none"> <li>1. Reference to land at Jewsons, Moor Lane. Planning permission held for 36 residential units.</li> <li>2. Supportive of the decision to pursue Option 4.</li> <li>3. CBRE agree with the approach of releasing weakly performing Green Belt, however would seek to reiterate the need to ensure sustainable brownfield land in sustainable locations are identified in the first instance in line with NPPF para 137.</li> <li>4. Stage 1b – the sift of sites undermines the significant role of small and medium site allocations in housing delivery. The approach set out is contrary to NPPF para 119 which</li> </ol>	<ol style="list-style-type: none"> <li>1. Noted.</li> <li>2. Noted.</li> <li>3. Noted. Para 5.2 of the SSM notes that consideration will be given to the use of brownfield land.</li> <li>4. Noted. On reflection the site threshold has been reduced to the definition of major development. More information is provided in para 3.25 – 3.28.</li> <li>5. Noted. This refers to absolute constraints only whereby development would be restricted. See point 4 response regarding site threshold.</li> </ol>

Rep No	Representor	Summary of comments made	Officer response
		<p>requires LPAs to take a proactive approach to identifying land.</p> <p>5. The methodology states that sites removed at this stage can only be reconsidered where alterations to the site boundary could be made to remove constraints or where it could be used for other uses. In the case of most brownfield sites, it is not always possible for the size of the site to be altered. Therefore, sites with an indicative threshold capacity of under 100 units would be removed from the site allocation process at this very early stage.</p> <p>6. Stage 2a – sets out that the spatial strategy focuses on the sequential use of land, which prioritises using brownfield land then considers Green Belt. The approach of the methodology prior to this is contradictory and is likely to ignore the contribution of a number of suitable brownfield sites before then.</p> <p>7. The approach does not accurately reflect the need to assess and understand the capacity of small and medium sites nor does it assess their potential for increased capacity, in line with NPPF para 123.</p> <p>8. The lack of assessment and subsequent allocation of sites below 100 units will not</p>	<p>6. Prior to stage 2a the assessment looks at absolute constraints and Sustainability Appraisal. This is not considered to ignore the supply of brownfield sites. Smaller brownfield sites will be assessed through the SLAA 2019. Where assessed as suitable, available and achievable, they are considered to be developed through the planning system.</p> <p>7. See response to point 4.</p> <p>8. See response to point 4.</p> <p>9. The assessment is considered to adequately consider the capacity of sites. The SSM recognises where sites will play an important role in the delivery of infrastructure and therefore sets out that these will be assessed.</p> <p>10. The site selection process will assess all potential development sites from a range of sources and is therefore considered to adequately consider reasonable alternatives. See response to point 6.</p> <p>11. See response to point 4.</p>

Rep No	Representor	Summary of comments made	Officer response
		<p>provide certainty for applicants and SBC's housing trajectory.</p> <p>9. Infrastructure - If site capacity is not assessed and understood then necessary infrastructure will not be known and planned for.</p> <p>10.Green belt – the site selection methodology as currently could remove a number of sustainable brownfield sites capable of contributing to meeting needs prior to them being sufficiently examined. The SSM does not fully examine all reasonable alternatives and is therefore contrary to para 137 of the NPPF.</p> <p>11.The methodology does not make provision for the allocation of small and medium sized sites. In addition to the requirements of NPPF para 68, site allocations can provide certainty and incentives for developers to bring forward sites therefore play an important role in contributing to housing supply.</p>	
014	Neame Sutton, on behalf of A2Dominion	<p>1. A2Dominion is reasonably content with the approach the Council proposes to take.</p> <p>2. Para 1.2 – the new Local Plan should allocate sufficient land to meet housing need. Any Green Belt boundary review should assess all land</p>	<p>1. Noted.</p> <p>2. Noted. It is the purpose of the site selection process to identify which sites are most appropriate for allocation.</p>



Rep No	Representor	Summary of comments made	Officer response
		<p>parcels and ensure that all appropriate land is released to meet needs.</p> <p>3. Para 1.4 – in pursuing Option 4 the Council is restricting the approach to site selection. All suitable, available and achievable land should be assessed on an equal basis. The Council needs to remain open to the prospect of a change in spatial strategy guided by sites rather than a pre-determined strategy. This may not be sustainable and raise issues of soundness.</p> <p>4. The Council needs to robustly consider the viability of increased densities in town centres and near transport hubs.</p> <p>5. The release of Green Belt adjacent to urban areas is supported by A2Dominion and is considered necessary to meet needs.</p> <p>6. Paras 1.6-1.8 – the Council’s approach to the standard method for calculating housing requirement is supported.</p> <p>7. Para 1.12 – A2Dominion support the 250m buffer as being the most sustainably located land. All parcels of land assessed as being suitable for release should be released to meet needs.</p>	<p>3. It was the purpose of the Issues and Options consultation to determine which approach would be most appropriate for the Borough. All evidence base studies were used to inform the Issues and Options consultation. The results of this, also informed by Sustainability Appraisal, have helped to inform which spatial strategy to pursue. The site assessment process is judged to robustly consider the sustainability of sites and highlight which are most appropriate for development. The SA and site selection process will help to guide the strategy pursued.</p> <p>4. Noted. The Council will carry out appropriate viability assessment to guide the Local Plan.</p> <p>5. Noted.</p> <p>6. Noted.</p> <p>7. Noted. The site selection process will consider Green Belt performance as well as a range of other factors such as sustainability to determine if sites should be released.</p> <p>8. Noted. <b>Stage 2a updated to regarding contribution to meeting the housing requirement.</b></p>

Rep No	Representor	Summary of comments made	Officer response
		<p>8. Para 3.9 – the Council appears to ignore that meeting the minimum housing requirement is a strategic priority.</p> <p>9. The Council appears to be suggesting that a site needs to perform a further strategic function which is not the intention of para 23 of NPPF. The Council is at risk of discounting sites that can deliver housing simply because they don't perform another 'strategic function' as well.</p> <p>10. Para 3.12 – Agree that the Council should explore publicly owned sites.</p>	<p>9. <b>Text added to stage 2a to clarify.</b> Stage 2a is considered to assess the role that each site plays in meeting the Local Plan strategy and objectives. This is an important consideration when determining which sites to allocate.</p> <p>10. Noted.</p>
015	Terence O'Rourke, on behalf of Redrow Homes	<p>1. There are significant shortcomings in progressing with Option 4.</p> <p>2. Our response to the Issues and Options consultation set out a robust case for Option 5, with a new community at Kempton Park. This would contribute to a more sustainable and deliverable strategy.</p> <p>3. Housing supply from Green Belt release should form part of the spatial strategy. Kempton Park should be considered.</p>	<p>1. Noted. Option 4 as set out in para 1.4 and 5.1 was deemed to be the most appropriate strategy.</p> <p>2. Noted. The Council gave due regard to all representation received. The Issues and Options consultation was non-site specific and related to four broad strategic options. This explored the option of releasing any Green Belt, within the Borough. Consideration will be given to specific sites through this site selection process and the</p>

Rep No	Representor	Summary of comments made	Officer response
		<p>4. The Council's Duty to Cooperate (DtC) partners are likely to challenge the Council's failure to positively plan for strategic Green Belt release in sustainable locations around public transport hubs and on brownfield land.</p> <p>5. The Local Plan will need to maximise development around rail stations.</p> <p>6. The announcement to progress to Option 4 lacks transparency. It is unclear whether any Council decision-making body has agreed Option 4. It is inappropriate for the announcement of the preferred Strategic Option to be made in this consultation document. There is limited information as to why Option 4 was chosen in para 1.4. There is no evidence that a rigorous assessment of the options following consultation has taken place or whether new strategic options need consideration. The Council risks progressing a Strategic Option without any political legitimacy.</p> <p>7. The 590 need figure is a starting point and needs to reflect uplifts responding to aspirations for employment growth and meeting unmet need.</p> <p>8. There is an annual requirement of 1,011 new homes taking account of shortfall since 2016.</p>	<p>Preferred Options plan. Each site will be subject to public consultation.</p> <p>3. Noted. All sites will be considered through the site selection process.</p> <p>4. This claim is not evidenced. The Council continues to engage DtC partners throughout the plan process and will continue to engage on strategic matters moving forward. As stated in Stage 2a consideration will be given to brownfield sites, whilst through Stage 2d, consideration will be given to the sustainability of locations, including transport.</p> <p>5. Noted. Higher density development will be sought where appropriate, as noted in para 5.3 and Stage 4c.</p> <p>6. The decision to pursue Option 4 was recommended by officers and discussed with Members at Local Plan Working Party. This was informed by the Issues and Options consultation and the Sustainability Appraisal.</p> <p>7. Noted. The Local Housing Need figure is considered to be a minimum and the Council will consider this in updates to its housing evidence.</p>

Rep No	Representor	Summary of comments made	Officer response
		<p>9. The Council should be planning to meet all of Runnymede's 826 unmet need and unmet London need.</p> <p>10. The site selection should be updated throughout the plan making process to reflect the latest technical information, including reports that are submitted in the summer 2019 during the draft local plan regulation 18 consultation, and any amendments to the emerging spatial strategy.</p> <p>11. Stage 1a – we consider all SLAA sites in years 1-5 be considered further through the site selection process or at the very least an update to the SLAA.</p> <p>12. Strategic threshold – setting a threshold is a useful way of ensuring a focused site selection however further details are required as to why 100 units in the urban area is 'strategic' but a unit threshold in the non-urban area is not provided. Urban needs to be defined in relation to settlement boundaries. Densities should be included.</p> <p>13. Recognition of the role that smaller sites can play (NPPF para 68).</p>	<p>8. The standard methodology takes account of previous under delivery up to its introduction. Outside the scope of the methodology.</p> <p>9. Outside the scope of the methodology and considered incorrect.</p> <p>10. Noted and agreed. Site selection to be updated when relevant new information comes to light.</p> <p>11. The SLAA will be updated annually with the next iteration due in 2019.</p> <p>12. On reflection the site threshold has been reduced to the definition of major development. More information is provided in para 3.25 – 3.28 of the SSM. It was not considered necessary to include a threshold for Green Belt sites as it is only through the Local Plan process that amendments can be assessed so all sites must be considered. <b>Text to be included on the definition of 'urban' in relation to settlement boundaries.</b></p> <p>13. On reflection the site threshold has been reduced to the definition of major development. More information is provided in para 3.25 – 3.28 of the SSM.</p>

Rep No	Representor	Summary of comments made	Officer response
		<p>14. SA Stage – it is queried how potential mitigation will be considered given the relatively early stages of the planning process. We would request that promoters are able to identify potential adverse effects and suitable types of mitigation measures rather than specific details or commitments.</p> <p>15. Stage 2 – broadly support areas covered. We note the order differs between stages 2c and 2d in the summary diagram and main text.</p> <p>16. A new Stage 2e is required to cover landscape and townscape visual impact, extending to both non-Green Belt and Green Belt.</p> <p>17. Stage 2a – Option 5 devised should be pursued. This stage should explicitly recognise the ability of sites to contribute to wider sustainability gains.</p> <p>18. Stage 2c – open space and recreation value – the Council should define what it meant by a ‘recreational role’.</p> <p>19. Stage 2d – the focus on distances to existing facilities is correct. Building on para 5.17 we request that consideration given to opportunities to enhance a range of facilities and services.</p>	<p>14. Noted and agreed that given the relatively early stages of the Local Plan, detailed site specific information may not be available. Para 4.4 states that the assessment will cover likely effects and where possible, seek to identify how harmful effects could potentially be mitigated. <b>Clarifying text to be added to reflect the potentially limited information available at present.</b></p> <p>15. Noted. <b>Correct diagram.</b></p> <p>16. Noted. It is agreed that visual impact could result from both Green Belt and non-Green Belt sites. It should however be noted that Green Belt plays an important role in the prevention of sprawl by keeping sites permanently open. This by its very nature means that Green Belt has a significant role on visual impact. In addition, in response to the Issues and Options consultation, a notable number of responses recorded the need to preserve the Green Belt for the well-being of the Borough. It is therefore considered appropriate to take into account the role of Green Belt in the Spelthorne context and consider an additional layer of assessment, looking at the role of visual amenity within the Green Belt, and</p>

Rep No	Representor	Summary of comments made	Officer response
		<p>20. Stage 3a – Stage 1 GBA and Stage 2 methodology is flawed. The reliance on the scoring is not robust.</p> <p>21. Para 6.8 is misleading. Maintaining the pattern of settlements is not a purpose of the Green Belt in the NPPF. It also overlooks the ability of strategic sites in the Green Belt to create new communities whilst responding to the settlement pattern.</p> <p>22. Stage 3b – welcome reference to PDL. Could also include a dedicated assessment of public transport accessibility in line with NPPF para 138.</p> <p>23. Stage 3c – if visual amenity is to be considered it must be in a fair and rational manner. The current approach is not.</p> <p>24. Opportunities for enhanced visual amenity should only be explored once the extent of the Green Belt is set through the new Plan.</p> <p>25. It could be contended that the Council is selectively choosing visual amenity at Para 141 of NPPF. Why not consider others?</p>	<p>subsequently keep this step within stage 3. <b>Additional consideration of landscape and townscape given to stage 2b, Table 3.</b></p> <p>17. Sustainability will be assessed in stage 2c and through the Sustainability Appraisal. Other benefits are also listed as a consideration, however it should be noted that this list is not exhaustive.</p> <p><b>18. Additional text to be added on ‘recreational role’.</b></p> <p>19. Noted. <b>Para 5.19 to be updated to cover other types of supporting infrastructure.</b></p> <p>20. The Green Belt Assessment has been developed using a robust methodology in line with that utilised by a number of local authorities. The approach is considered objective and transparent.</p> <p>21. Paragraph 133 states that the fundamental aim of Green Belt policy is to prevent sprawl. By preventing sprawl development is limited to settlements, which therefore means that it is directed to the most sustainable locations, within the settlement boundaries. By its very nature Green Belt</p>

Rep No	Representor	Summary of comments made	Officer response
		<p>26. Stage 3c should be removed and incorporated within a broader assessment of visual impact for all sites.</p> <p>27. Guidance in Landscape Institute and Institute of Environmental Management and Assessment, 2013, Guidelines for Landscape and Visual Assessment (3rd edition) (GLVIA) should be followed. A qualified landscape architect with expertise in landscape and visual assessments should be used.</p> <p>28. Either landscape and visual effects or just visual effects in line with the GLVIA should be assessed. When assessing visual sensitivity, it is the sensitivity of the visual receptors that should be assessed not whether it can accept change of use which is landscape character not visual.</p> <p>29. Aerial mapping is not an acceptable way of assessing current viewpoints into sites.</p> <p>30. Para 6.34 is unclear.</p> <p>31. Stage 3 should also incorporate stages 3d on improvements to environmental quality and stage 3e on accessibility to remaining Green Belt. Green Belt sites should be ranked based on the criteria and proposed criteria in stage 3.</p>	<p>focuses development towards sustainable locations. It is recognised that there may be circumstances where Green Belt sites may provide sustainable locations and that is for the site selection process to determine.</p> <p>22. Transport will be assessed through stage 2d as set out in Table 5. Findings will be brought together in Stage 4a.</p> <p>23. See point 16 response.</p> <p>24. It is considered appropriate to take a pragmatic and joined up approach to the site assessment process so that mitigation measures can be identified at an early stage and effectively incorporated into potential allocations. This is reflected in SA which is an iterative process. This is considered a proactive and positive approach.</p> <p>25. Other parts of the methodology consider various elements of para 141 of the NPPF. Stage 2c of the assessment considers access and recreation and Stage 2b considers mitigating biodiversity impacts. <b>Additional text to be added to clarify. See para 6.11.</b></p>

Rep No	Representor	Summary of comments made	Officer response
			<p>26. See response to point 16.</p> <p>27. The GLVIA sets out guidance it is not a statutory requirement. The proposed approach to assessing visual amenity is considered logical and robust.</p> <p>28. Visual amenity is considered to cover landscape impact to a degree with the two connected. <b>Additional clarifying text to be added.</b></p> <p>29. Whilst aerial maps will be used to initially determine the key viewpoints additional research, including site visits, will be undertaken to confirm findings. <b>Additional clarifying text to be added to para 6.24.</b></p> <p>30. Para 6.34 is considered to adequately explain how sensitivity of visual receptor and magnitude of visual impact will be assessed.</p> <p>31. Accessibility is already a consideration in the SSM through stage 2d and enhancement opportunities will be explored through the process, particularly through mitigation opportunities.</p>



Rep No	Representor	Summary of comments made	Officer response
016	Nexus Planning, on behalf of Croudace Homes	<ol style="list-style-type: none"> <li>1. Comments made in relation to promoted site, Land at Fordbridge Road, Sunbury.</li> <li>2. Croudace Homes is pleased to see confirmation that Option 4 will be pursued.</li> <li>3. The standard methodology Local Housing Need figure should be seen as a minimum.</li> <li>4. It is unclear whether the Council has had regard to methodology used in the preparation of other adopted plans. This would be a worthwhile exercise.</li> <li>5. The site selection is limited to those sites deemed 'strategic' in scale.</li> <li>6. Stage 1 – will assess sites above a 100-unit threshold, commercial sites, existing allocations, publically owned sites. Sites in the Green Belt will not be subject to a size threshold.</li> <li>7. Croudace Homes does not object to the suggested scoring mechanism on a range of criteria including sustainability, flood risk, biodiversity etc. Assessment of promoted site provided at Appendix.</li> </ol>	<ol style="list-style-type: none"> <li>1. Noted.</li> <li>2. Noted.</li> <li>3. Noted. The Local Housing Need figure is considered to be a minimum and the Council will plan for this until any updates become available.</li> <li>4. The Council has undertaken a research and review exercise prior to developing the SSM to consider how other local planning authorities have undertaken similar work. <b>Reference to be made to LPA research exercise in the methodology.</b></li> <li>5. Noted.</li> <li>6. Noted. All sites located in the Green Belt will be assessed through the site selection process as it is only through the Local Plan process that Green Belt boundaries can be amended.</li> <li>7. Noted. Assessment of promoted site not relevant to the methodology consultation. All sites will be assessed objectively using the SSM.</li> </ol>

Rep No	Representor	Summary of comments made	Officer response
017	Carter Jonas, on behalf of Cemex UK Properties Ltd	<ol style="list-style-type: none"> <li>1. Representations relate to landholdings at the southern edge of Upper Halliford in Shepperton and land adjacent to the southern boundary of Heathrow Airport in Stanwell.</li> <li>2. We support in principle the utilisation of the standard methodology for calculating housing need however this should be seen as a minimum.</li> <li>3. We support in principle the undertaking of a Green Belt review.</li> <li>4. We support the site selection criteria at para 2.2.</li> <li>5. Stage 1 – regarding the threshold, it is suggested that SBC appreciate the role smaller sites will have to play in meeting its strategic objectives, as recognised in para 68 of the NPPF.</li> <li>6. We support the SSM in not considering the Green Belt as an absolute constraint.</li> <li>7. Stage 2a – detail provided regarding both promoted sites in relation to strengthening Green Belt boundaries with release.</li> </ol>	<ol style="list-style-type: none"> <li>1. Noted.</li> <li>2. Noted. The Local Housing Need figure is considered to be a minimum and the Council will plan for this until any updates become available.</li> <li>3. Noted.</li> <li>4. Noted.</li> <li>5. Noted. On reflection the site threshold has been reduced to the definition of major development. More information is provided in para 3.25 – 3.28 of the SSM.</li> <li>6. Noted.</li> <li>7. Noted. Each site will be assessed using the SSM to ensure each is analysed in a robust and logical manner.</li> </ol>

Rep No	Representor	Summary of comments made	Officer response
018	Turley, on behalf of Panattoni	<ol style="list-style-type: none"> <li>1. Representations made relate to landholdings to the west of Long Lane, Stanwell. Information provided on the merits of the site.</li> <li>2. The approach follows the Planning Practice Guidance and is considered broadly appropriate.</li> <li>3. It is important to adopt a policy off approach.</li> <li>4. If there are designations from a previous Plan or pre-NPPF, it is important to make a re-assessment of these opportunities and to consider each site on its own planning merits.</li> <li>5. The suitability of land involves an assessment of the extent to which extant current Development Plan policies remain relevant.</li> <li>6. The designation of land as Green Belt is of limited relevance in determining suitability and thereby ensuring it does not fail at the first hurdle of site assessment. In this regard Panattoni welcome that the Council will consider the suitability of land for Green Belt release through a Green Belt review as noted by the consultation document.</li> <li>7. Stage 1b - It is noted that there will be an initial sift of sites, including absolute constraints. In</li> </ol>	<ol style="list-style-type: none"> <li>1. Noted. The site selection process will consider each site objectively using the SSM.</li> <li>2. Noted.</li> <li>3. Noted. The steps included in the SSM are considered to assess each site robustly and logically. Whilst the SLAA is a technical policy off document, the site selection process has regard to the strategic priorities and objectives of the Plan.</li> <li>4. All existing allocations will be assessed through the site selection process to consider the extent to which they are still suitable, available and achievable.</li> <li>5. As part of the Local Plan review process consideration has been given to the extent to which adopted policies remain compliant with the NPPF. This will inform the assessment process. Where policies are not considered to be up to date, regard will be given to national policy and guidance. <b>Reference to current Core Strategy to be removed where out of date.</b></li> <li>6. Sites will not be discounted automatically if they are located within the Green Belt. The Green Belt Assessment itself does not make</li> </ol>

Rep No	Representor	Summary of comments made	Officer response
		<p>line with planning practice guidance, Panattoni believe that no development site should be automatically discounted without undertaking a review of how constraints could be overcome.</p>	<p>decisions on which land to release but will inform the Local Plan process on allocating sites, particularly through the site selection process. This council will use all available evidence in determining which sites will be released from the Green Belt.</p> <p>7. Stage 1b will sift out sites that are subject to absolute constraints. These are constraints that would prevent development from taking place and where it would not be possible to mitigate impacts. As such it is considered appropriate to filter sites early in the process. Consideration has also been given to the constraints used in the Green Belt Stage 2 methodology which is available on the Council's website, deemed to allow for consistency. In order to assess the most sustainable sites a 250m buffer around settlements has also been applied.</p>
019	London Irish Holdings Ltd	<ol style="list-style-type: none"> <li>1. London Irish supports the approach to pursue Option 4.</li> <li>2. Stage 1a – We note the SLAA identified Green Belt as a policy constraint and Green Belt sites were generally not considered suitable using the GBA stage 1. Assessing any site as part of a larger parcel would have a negative assessment against Green Belt purposes. We understand</li> </ol>	<ol style="list-style-type: none"> <li>1. Noted.</li> <li>2. The Site Selection process will consider smaller parcels of land informed by the findings of the Green Belt Assessment Stage 2. The Green Belt Assessment Stage 1 will be used to help consider the wider context.</li> </ol>

Rep No	Representor	Summary of comments made	Officer response
		<p>the SSM will include site assessments on a more individual basis using the Green Belt Assessment Stage 2.</p> <p>3. Stage 1b: We note an initial sift on absolute constraints not considered to be reasonable alternatives. Assessment provided of proposed site against criteria.</p> <p>4. Stage 2a – considered the proposed site will help to meet the spatial strategy. Considered the development of the site would support the club’s long term future and service to the community.</p> <p>5. Stage 2b-2d – we agree with the methodology proposed. Assessment of the promoted site provided.</p> <p>6. Stage 3 – no comments at this stage.</p> <p>7. Stage 4 – no specific comments at this stage.</p>	<p>3. Noted. All sites will be assessed objectively using the proposed methodology.</p> <p>4. Noted. All sites will be assessed objectively to determine their contribution to the delivery of the spatial strategy.</p> <p>5. Noted. All sites will be assessed objectively using the proposed methodology.</p> <p>6. Noted.</p> <p>7. Noted.</p>
020	Carter Jonas, on behalf of The Stunt Company Ltd	<p>1. Representations relate to land either side of Charlton Road, Shepperton.</p> <p>2. The standard methodology for calculating housing need is an absolute minimum Local Housing Need figure.</p>	<p>1. Noted. The Council will robustly assess all sites.</p> <p>2. Noted and agreed.</p> <p>3. The Council will be updating the SLAA in 2019 to ensure that the list of assessed sites</p>

Rep No	Representor	Summary of comments made	Officer response
		<p>3. SLAA – we would caution the robustness of the suggested supply.</p> <p>4. We contest the point made at para 3.7 that it is not necessary to consider again sites located within urban areas. There are a wealth of considerations that could impact the principle of development. The Council needs to recognise the role that smaller sites will have to play in meeting strategic objectives, as recognised in para 68 of the NPPF.</p> <p>5. Green Belt - We support the methodology in not considering Green Belt as an absolute constraint. In making Green Belt releases, the Council should look to maximise the development of brownfield sites within the Green Belt.</p> <p>6. Sustainability Framework – the Council will need to ensure that this complies with the necessary legal framework. The SA should remain an iterative process up to adoption of the Plan.</p> <p>7. Stage 2a – the Council will need to look at additional sites to those shortlisted in the GBA stage 1.</p>	<p>is up to date and robust. This will be used to inform the site assessment process.</p> <p>4. Noted. On reflection the site threshold has been reduced to the definition of major development. More information is provided in para 3.25 – 3.28 of the SSM. Consideration will be given to the role that each site plays in meeting strategic objectives.</p> <p>5. Noted. In line with NPPF para 138 PDL or sites well-served by public transport will be considered first. This is reflected in stage 2a.</p> <p>6. Noted. The SA will be updated throughout the plan process.</p> <p>7. The Green Belt Assessment Stage 2 is looking at the performance of smaller, more refined parcels of land within the Green Belt. These will be assessed through the site selection process.</p> <p>8. Noted. Previously Developed Land will be considered in the process. Each site will be assessed using the SSM.</p> <p>9. Para 5.3 states that brownfield land will be considered in the delivery of the spatial strategy. Brownfield land will also be</p>

Rep No	Representor	Summary of comments made	Officer response
		<p>8. The site at Charlton Road accords with bullet two of the spatial strategy as detailed in para 5.1. The site assessment should reflect this contribution to the spatial strategy and is PDL.</p> <p>9. The methodology is not clear how the spatial strategy categorises brownfield sites within the Green Belt compared to both brownfield outside the Green Belt and Green Belt land.</p> <p>10. Para 137 of the NPPF is clear that all brownfield sites should be considered priority to making subsequent releases of greenfield land.</p> <p>11. Stage 2b – assessment of promoted site against non-absolute constraints.</p> <p>12. Stage 2c – we object to the principle of developing upon publically accessible open and recreational spaces within urban areas, even where these incorporate re-provision in the Green Belt. The Council should seek to retain and enhance the quality and accessibility of these areas. We support the exclusion of any site that performs an important recreation role and this should be considered an absolute constraint.</p> <p>13. Stage 2d – whilst we support the assessment criteria in Table 5, it should be appreciated that</p>	<p>assessed in the Green Belt through stage 3b. Findings will be brought together in stage 4a.</p> <p>10. Noted. See response to point 9.</p> <p>11. Noted. Each site to be assessed objectively through the site selection process.</p> <p>12. Stage 2c considers the role that each site plays in terms of its recreation value and open space provision. Regard will be given to para 97 of the NPPF.</p> <p>13. Para 5.17 refers to the consideration of opportunities to improve connectivity. <b>Text to be added to consider the opportunity for service/facility provision.</b></p> <p>14. Noted. Each site will be robustly assessed through the process.</p> <p>15. Noted.</p> <p>16. The proposed sequence is considered appropriate. Stage 4a is considered to bring together the findings of the previous stages.</p> <p>17. The assessment process as a whole is considered to assess the performance of</p>

Rep No	Representor	Summary of comments made	Officer response
		<p>the allocation of new development sites is capable of contributing to or providing facilities and transport connections.</p> <p>14. Stage 3 – assessment of land either side of Charlton Road confirms its release would enhance permanence of boundaries.</p> <p>15. We support the undertaking of a Landscape and Visual Impact Assessment in stage 3c.</p> <p>16. Stage 4a – We would recommend to undertake the Stage 2a assessment at this point once the technical assessment of sites has been undertaken and ranked. This will allow the Council to more readily assess a combination of sites they know to be highly sustainable and deliverable, against the spatial strategy.</p> <p>17. There needs to be an assessment to discover which combination of sites best meet the spatial strategy that in turn delivers the spatial objectives.</p> <p>18. Stage 4b – concerns over the SLAA assessment of sites and so should be undertaken robustly.</p> <p>19. SBC should ensure the delivery of sites, in line with the Housing Delivery Test.</p>	<p>each site. Stage 2a will be fed into the final analysis.</p> <p>18. The SLAA will be updated in 2019 to ensure its robustness.</p> <p>19. Noted and agreed. Deliverability will be a key consideration.</p> <p>20. The assessment of site capacity will aim to maximise densities where appropriate, however due regard will be given to local character and context.</p>



Rep No	Representor	Summary of comments made	Officer response
		<p>20. Stage 4c – the principle of increasing densities in urban areas should be reflected in Green Belt sites.</p>	
021	GL Hearn, on behalf of the landowner of Unit 1, Longwood Business Park	<ol style="list-style-type: none"> <li>1. It is important that the methodology is in line with the revised NPPF, 2018.</li> <li>2. We support Option 4.</li> <li>3. In general we consider that the draft SSM contains all of the key ingredients for the assessment however it could be simplified and more streamlined.</li> <li>4. We suggest that the main amendment to the approach should be to consider PDL/brownfield first, regardless of its location.</li> <li>5. Constraints analysis and other considerations, e.g. accessibility and the Green Belt should be assessed for PDL/brownfield before the method considers other sites.</li> <li>6. The Green Belt Assessment is flawed in light of para 138 which notes that “should first give consideration to land which has been previously developed”.</li> </ol>	<ol style="list-style-type: none"> <li>1. Noted and agreed.</li> <li>2. Noted.</li> <li>3. Noted. The SSM has been developed to robustly assess sites and to cover all necessary considerations.</li> <li>4. Stage 2a of the assessment notes that previously developed land/brownfield land will be considered in the assessment process. Stage 3b will also consider PDL within the Green Belt.</li> <li>5. The proposed approach is considered to adequately consider the role of PDL. Stage 4a will bring together each previous stage of the assessment.</li> <li>6. Noted. As set out in Stage 2a, a sequential approach to brownfield land will be undertaken. <b>Additional text to be added to explain that this applies to all brownfield land.</b></li> </ol>

Rep No	Representor	Summary of comments made	Officer response
		<p>7. The approach to considering land for release from the GB must be made as objective as possible, and introducing a separate assessment for PDL only would be beneficial to the assessment.</p> <p>8. In terms of threshold, the SMM states that a 100 unit limit applies to urban sites, however no thresholds for Green Belt sites. We suggest it is challenging to suggest site thresholds at this stage especially as site capacities will not be reviewed until sites are selected.</p>	<p>7. Noted and agreed. The Green Belt Assessment undertaken by consultants Arup is considered objective. In applying a standard and logical methodology to all sites the assessment will be undertaken objectively. PDL is considered through stage 3b.</p> <p>8. Noted. On reflection the site threshold has been reduced to the definition of major development. More information is provided in para 3.25 – 3.28 of the SSM. Consideration will be given to the role that each site plays in meeting strategic objectives.</p>
022	Carter Jonas, on behalf of Landchain	<p>1. Representation relate to land at Bedford Road/Long Lane, promoted for employment use.</p> <p>2. Green Belt Assessment – we support in principle the undertaking of a Green Belt review.</p> <p>3. Stage 1 – SLAA – we support this but want to ensure that this does include sites that are contained within the latest SLAA, in line with para 3.16 of the draft SSM.</p>	<p>1. Noted.</p> <p>2. Noted.</p> <p>3. The SLAA will be updated in 2019 and will inform the assessment of sites through the site selection process.</p> <p>4. Noted.</p> <p>5. Noted.</p> <p>6. Noted.</p>

Rep No	Representor	Summary of comments made	Officer response
		<p>4. Green Belt – we support the approach in not considering the Green Belt as an absolute constraint.</p> <p>5. Stage 2a – we support the Council’s move to release weakly performing Green Belt where it would not adversely affect the integrity of the strategic Green Belt.</p> <p>6. Stage 3 – we support undertaking of a Landscape and Visual Impact Assessment.</p> <p>7. Stage 4a – We would recommend to undertake Stage 2a at this point, once the technical assessment of sites has been undertaken and ranked. This will allow the Council to more readily assess a combination of sites they know to be highly sustainable and deliverable, against the spatial strategy.</p> <p>8. There needs to be an assessment to discover which combination of sites best meet the spatial strategy that in turn delivers the spatial objectives.</p> <p>9. Stage 4c - Stage 4c – the principle of increasing densities in urban areas should be reflected in Green Belt sites.</p>	<p>7. The proposed sequence is considered appropriate. Stage 4a is considered to bring together the findings of the previous stages.</p> <p>8. The assessment process as a whole is considered to assess the performance of each site. Stage 2a will be fed into the final analysis.</p> <p>9. The assessment of site capacity will aim to maximise densities where appropriate, however due regard will be given to local character and context.</p>
023	GL Hearn, on behalf of Wates Development Ltd	1. Representations relate to promoted site at Vicarage Road.	1. Noted.

Rep No	Representor	Summary of comments made	Officer response
		<ol style="list-style-type: none"> <li>2. We support Option 4.</li> <li>3. The SSM could be streamlined and simplified.</li> <li>4. The assessment should follow a sequential approach to Green Belt sites, considering public transport service as a key measure of sustainability first.</li> <li>5. The Green Belt assessment is not NPPF 2018 compliant as it looked at an assessment against the five purposes of including land in the Green Belt and visual effects of development. The 2018 NPPF is clear that this is not the correct approach.</li> <li>6. The application of a 250m buffer in the GBA is rudimentary and does not follow NPPF policy. Public transport service should be assessed.</li> <li>7. No justification for not applying a threshold in the Green Belt.</li> <li>8. The 250m buffer is an arbitrary figure.</li> <li>9. Stage 2d – many of the criteria are undefined and unclear at this stage. Too many ambiguities such as ‘good service’.</li> </ol>	<ol style="list-style-type: none"> <li>2. Noted</li> <li>3. Noted. The SSM has been developed to robustly assess sites and to cover all necessary considerations.</li> <li>4. The SSM considers the extent to which public transport serves each site. Findings will be considered in the round in stage 4 which brings together each stage of the assessment.</li> <li>5. It is considered that the Green Belt Assessment is compliant and is based on a robust methodology, informed by similar approaches undertaken by other local authorities. In line with the NPPF 2018 the assessment considers the five purposes of Green Belt. Visual effects have been considered through the assessment of openness which, at para 133, is deemed an essential characteristic of Green Belt.</li> <li>6. Public transport is assessed in stage 2d. The 250m buffer used is considered to follow the approach included in the GBA stage 2 for consistency and identifies land closest to the settlement boundary.</li> </ol>

Rep No	Representor	Summary of comments made	Officer response
		<p>10. Stage 3c – with reference to para 141, we are looking at amending Green Belt boundaries, not what happens once they have been defined.</p> <p>11. Need to consider public access to Green Belt as in NPPF para 138.</p> <p>12. Stage 3c – assessment of visual amenity is difficult without a specific scheme so should not be carried out at the plan making stage but at application stage.</p>	<p>7. It is not considered necessary to set a threshold in the Green Belt as it is only through the Local Plan that any amendments to the Green Belt boundary can be made. All Green Belt sites will therefore be assessed.</p> <p>8. The 250m buffer is considered a reasonable buffer for the local service centres and their surrounding urban areas. These buffers indicated the likely maximum extent of sustainable development. A wider buffer would have likely seen duplication due to the reasonably small nature of the Borough.</p> <p>9. 'Good' level of service is considered to offer the most benefits for maximising sustainable transport options. This element of the assessment will require officer judgment.</p> <p>10. It is considered appropriate to take a pragmatic and joined up approach to the site assessment process so that mitigation measures can be identified at an early stage and effectively incorporated into potential allocations. This is reflected in SA which is an iterative process. This is considered a proactive and positive approach.</p> <p>11. Stage 2c assesses the recreation value of each site, including the extent to which it is</p>

Rep No	Representor	Summary of comments made	Officer response
			<p>publically accessible. <b>Para 6.11 of Stage 3a updated to make reference to para 138 of the NPPF.</b></p> <p>12. It is acknowledged that due to the reasonably early stage of plan making detailed information may not yet be available. Consideration will therefore be given to the likely impacts resulting from the proposed scheme, based on typologies where appropriate. <b>Reference to be added to consideration of typologies where appropriate in para 6.29.</b></p>
024	Brian Madge Ltd, on behalf of Mr Glen Nash (and other residents of Highfield Road)	<p>1. We support the methodology in general terms but believe the weight given to previously developed sites should be expanded. The scoring in Table 2 only seems to reflect areas rather than impact.</p> <p>2. It is conceivable, and indeed often the case, that a site with less than 10% PDL could still be damaging to the Green Belt through scale, intensity of activity, height and uses. These factors are partially raised in para 6.18 but conclude it not possible to assess these other factors.</p>	<p>1. The proposed SSM is considered to give appropriate weight to PDL, particularly through stage 2a and 3b. Stage 4 will bring all of the stages together where further consideration will be given to the presence of PDL and its impact.</p> <p>2. Noted. The whole of stage 3 of the SSM will consider the impact on Green Belt, including stage 3c which has regard to the likely proposed development as set out in para 6.28 and 6.29. As set out in para 6.15, a qualitative assessment will be carried out to assist with the assessment process.</p>

Rep No	Representor	Summary of comments made	Officer response
		<p>3. We suggest a weighted score. Weight would be subjective but this is not necessarily a constraint as many aspects of the methodology are subjective.</p> <p>4. We propose also assessing building heights, use and land use.</p>	<p>3. Agreed that the nature of the assessment process is somewhat subjective, however the proposed methodology is considered to set out a logical and reasoned approach to minimise subjectivity. It is not considered necessary to weight the score. A qualitative assessment form part of the process to consider the level of impact.</p> <p>4. Para 6.28 and 6.29 sets out that the likely size and nature of the proposal will be assessed.</p>
025	Turley, on behalf of Shepperton Studios Ltd	<p>1. Summary of promoted site provided, including details of the proposed scheme 18/01212/OUT.</p> <p>2. The SSM follows the approach set out in the Planning Practice Guidance and is therefore considered broadly appropriate.</p> <p>3. SLAA – SSL reaffirm that suitability assessment should be policy off.</p> <p>4. If there are designations from a previous Plan or pre-NPPF, it is important to make a re-assessment of these opportunities and to consider each site on its own planning merits.</p>	<p>1. Noted. Not relevant to the site selection methodology consultation.</p> <p>2. Noted.</p> <p>3. Noted. The steps included in the SSM are considered to assess each site robustly and logically. Whilst it is considered appropriate to have regard to national policy, consideration will be given to the extent to which current adopted policies are in line with national policy. <b>Reference to current Core Strategy to be amended.</b></p> <p>4. The site selection process will assess existing allocations where they have not been developed.</p>

Rep No	Representor	Summary of comments made	Officer response
		<p>5. The suitability of land involves an assessment of the extent to which extant current Development Plan policies remain relevant.</p> <p>6. The designation of land as Green Belt is of limited relevance in determining suitability and thereby ensuring it does not fail at the first hurdle of site assessment. In this regard SSL welcome that the Council will consider the suitability of land for Green Belt release through a Green Belt review as noted by the consultation document.</p> <p>7. Stage 1b - It is noted that there will be an initial sift of sites. In line with planning practice guidance, SSL believe that no development site should be automatically discounted without undertaking a review of how constraints could be overcome.</p>	<p>5. See response to point 3. Consideration will be given to the extent to which adopted policies conform to the NPPF.</p> <p>6. Sites will not be discounted automatically if they are located within the Green Belt. The Green Belt Assessment itself does not make decisions on which land to release but will inform the Local Plan process, including the site selection assessment. This council will use all available evidence in determining which sites will be released from the Green Belt.</p> <p>7. Stage 1b will sift out sites that are subject to absolute constraints. These are constraints that would prevent development from taking place and where it would not be possible to mitigate impacts. As such it is considered appropriate to filter sites. Consideration has also been given to the constraints used in the Green Belt Stage 2 methodology which is available on the Council's website, deemed to allow for consistency. In order to assess the most sustainable sites, those outside of or not adjoining the 250m buffer around settlements will be discounted.</p>



