

# Site Selection Methodology

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**SPELTHORNE BOROUGH COUNCIL**

**FINAL REPORT**



## Spelthorne Takes Shape

February 2019



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## **1. Introduction & Background Evidence**

- 1.1 Spelthorne Borough Council is preparing a new Local Plan which will set out policies and proposals that will guide development in the area throughout the plan period.
- 1.2 The new Local Plan must allocate sufficient land in appropriate locations to meet housing, traveller and employment needs over the Plan period. As part of the evidence base for the emerging Local Plan, potential development sites will be assessed using the site selection methodology which provides a framework for the identification of appropriate sites for allocation. Each stage of the methodology is detailed in the following sections.
- 1.3 The Council undertook its Issues and Options consultation in May/June 2018. This set out the main issues for Spelthorne and identified four potential strategic options that could address the main challenges faced. The responses received to the consultation will assist in preparing the Preferred Options and overall strategy for the new Plan.
- 1.4 Using the Sustainability Appraisal, consultation responses and available evidence, the Council has decided to pursue Option 4, which includes:
  - Increasing densities in town centres and near transport facilities and other areas where the character can accommodate it and allowing high rise development in areas where there are existing tall buildings and they are of a high quality design
  - Releasing some weakly performing Green Belt land for development where its release would not adversely affect the integrity of the strategic Green Belt. Any consideration of the potential release of Green Belt will have due regard for the sustainability of location and the quantity of previously developed land.
  - Making use of a Master Plan approach for Staines but with housing as one of a range of uses that can be accommodated within the town and not favouring residential development over employment, retail and tourism uses.
- 1.5 It was clear from the representations received that the public had concerns about the loss of Green Belt and other open space, however many comments suggested that the overall housing need should warrant losing some Green Belt. The preferred approach will therefore reflect these considerations and each Green Belt site will be subject to thorough assessment. Through the site selection methodology the Council will also have regard to the role of open space and will discount any sites that hold recreational value. This is further detailed in Stage 2c.

### **Housing Need in Spelthorne**

- 1.6 In 2015 Spelthorne and Runnymede produced a joint Strategic Housing Market Assessment (SHMA) which set out the level of objectively assessed housing need (OAN) across the two Boroughs which form the Housing Market Area (HMA). The SHMA indicated that Spelthorne has a need for 552-757 dwellings per annum.
- 1.7 In 2017 the Government consulted on 'Planning for the Right Homes in the Right Places', setting out a number of proposals to reform the planning system

to increase the supply of new homes and increase local authority capacity to manage growth. Included was a standardised methodology for calculating housing need, with a target of 590 new dwellings per annum for Spelthorne.

- 1.8 The NPPF was revised in February 2019, confirming the need for authorities to use the standardised methodology. Planning Practice Guidance was also updated in February 2019 setting out that authorities should use the 2014-based household projections in the calculation. This means that Spelthorne will need to plan for in the range of 603 new dwellings per annum<sup>1</sup>.

### **Strategic Land Availability Assessment (SLAA)**

- 1.9 Spelthorne has prepared a Strategic Land Availability Assessment (SLAA) to inform the preparation of the Local Plan. The SLAA sets out the evidence for potential land supply in the Borough for housing and employment sites after having undertaken a Call for Sites (October 2016 – January 2017). The SLAA informed the Issues and Options stage of the Plan and will be updated in 2019 to inform the Preferred Options stage of the Plan. The SLAA is a live document and is subject to change to ensure that the most up to date information on land supply is considered through the development of the Local Plan. As such, SLAA sites, as well as additional sites identified since the publication of the 2018 SLAA, will be appraised in this assessment, provided they meet the initial sifting process as set out in this methodology.

### **Employment Land Needs Assessment (ELNA)**

- 1.10 The Spelthorne ELNA considers the need for additional employment floorspace across the Borough to 2035. The report sets out the quantity of B1, B2 and B8 floorspace required over the Plan period<sup>2</sup>. It will be for the Council to determine which sites to allocate for employment uses over the plan period.

### **Green Belt Assessment**

- 1.11 Spelthorne has undertaken a Green Belt Assessment to assess the performance of the Green Belt in the Borough. Consultants Arup produced a stage 1 assessment to consider the performance of local areas against the Green Belt purposes as set out in the NPPF and considered its strategic function. The stage 1 assessment identified a number of local areas which were deemed weakly performing or identified for further consideration.
- 1.12 A stage 2 assessment was then carried out which encompassed a finer grained assessment of sub areas. This applied a 250m buffer around the Borough's urban areas to consider the most sustainably located land.
- 1.13 In considering which sites to take forward, Spelthorne will need to consider the performance of each site and how they compare against one another.

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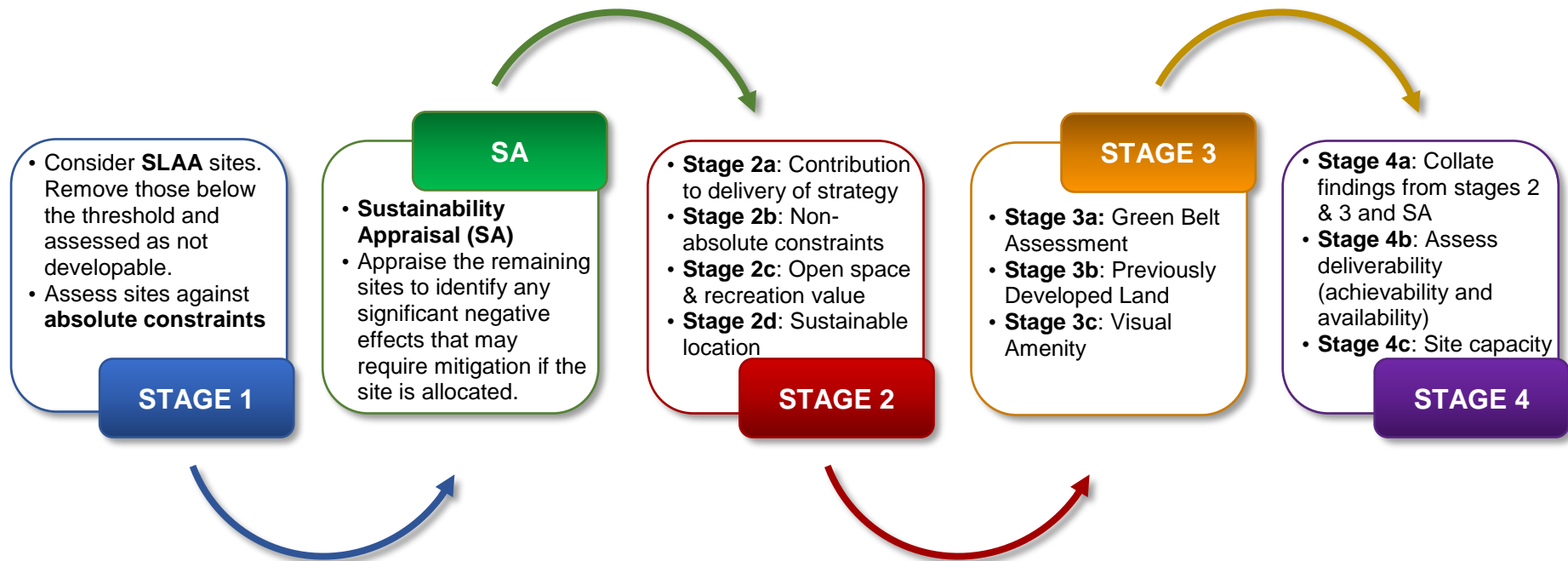
<sup>1</sup> Population and household projections are updated every 2 years, taking the most recent year as the baseline. Affordability ratios are published annually.

<sup>2</sup> [https://www.spelthorne.gov.uk/media/18155/Employment-Land-Needs-Assessment-2018/pdf/Employment\\_Land\\_Needs\\_Assessment\\_20181.pdf](https://www.spelthorne.gov.uk/media/18155/Employment-Land-Needs-Assessment-2018/pdf/Employment_Land_Needs_Assessment_20181.pdf)

## **2. Overview of Site Selection Methodology**

- 2.1 The Local Plan must allocate sufficient land in appropriate locations to ensure that there is adequate supply for the period of the Plan. Paragraph 23 of the NPPF sets out that planning authorities need to have a role in “planning for and allocating sufficient sites to deliver the strategic priorities of the area”.
- 2.2 The portfolio of site allocations to be included in the Local Plan for housing must meet the requirements of paragraph 67 of the revised NPPF, by which local planning authorities should: “identify a supply of specific, deliverable sites for years one to five of the plan period; and specific developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan”.
- 2.3 The NPPF also specifically addresses the need for Local Plans to be justified, requiring “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence” (paragraph 35).
- 2.4 Paragraph 8 of the revised NPPF notes that achieving sustainable development means the planning system has three overarching objectives which are interdependent and need to be pursued in mutually supportive ways. These objectives are economic, social and environmental, and plan making should aim to secure net gains across each. It is therefore important that the process of site selection, and the accompanying Sustainability Appraisal, adheres to these principles and avoids significant social, environmental or economic harm within the context of other policies in the NPPF.
- 2.5 In response to the NPPF and planning practice guidance, the Council has developed a site selection methodology to identify potential sites for allocation. The overall site selection methodology can be summarised below in Figure 1. Sites will be sieved once they are assessed against absolute constraints and will then be subject to more detailed assessment at each of the following stages. The development of the methodology has been informed by a desktop review of the approach taken by other local authorities. Key principles were taken on board, whilst regard has also been given to the local Spelthorne context.

Figure 1: Site Selection Methodology Summary



### 3. Stage 1 Assessment

#### Stage 1a – Strategic Land Availability Assessment (SLAA)

- 3.1 The Strategic Land Availability Assessment (SLAA) identifies a future supply of land which is suitable, available and achievable for housing and economic development uses in the Borough over the Plan period. This is an important step in the preparation of Local Plans. The 2018 SLAA provides a list of sites identified for potential future development and supported the Issues and Options document, which was subject to public consultation in May/June 2018.
- 3.2 Sites included in the SLAA were identified through the Council's call for sites exercise, an officer search of the Borough's urban area, sites that have been/are currently in the planning system, sites that are publically owned and existing allocations from the 2009 Core Strategy and Policies DPD have been reviewed.
- 3.3 In line with national planning practice guidance<sup>3</sup>, sites considered in the SLAA have been assessed as to whether they are deliverable or developable. The assessment of suitability was guided by the following:
  - The adopted 2009 Core Strategy and Policies DPD (where still in line with the NPPF) and national policy
  - Market and industry requirements in the housing market and functional economic area
  - Physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination
  - Potential impacts on landscape features, nature and heritage conservation
  - Appropriateness and likely market attractiveness for the type of development proposed.
  - Contribution to regeneration priority areas.
  - Environmental/ amenity impacts experienced by would-be occupiers and neighbouring areas.
- 3.4 SLAA sites have already been considered against absolute and non-absolute constraints and this has informed the assessment of suitability. The SLAA methodology<sup>4</sup>, which was developed jointly with Runnymede Borough Council, sets out details of the constraints considered through the SLAA process. Landowners have also been contacted to check the availability of sites and work has been undertaken to determine the achievability of those sites within the SLAA.
- 3.5 The SLAA is a technical document and its role is to consider the potential land supply in Spelthorne to help meet development needs. It is not however the evidence which considers which of the submitted sites perform more strongly or sustainably than others and which should be taken forward to allocation.
- 3.6 In general terms, the SLAA does not involve the assessment of sites against local policy priorities, whereas the process of site selection is undertaken in the planning strategy context and involves making professional and planning judgements to produce a portfolio of sites and broad locations suitable for allocation and designation in the Local Plan. Critically, the SLAA represents a

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<sup>3</sup> Housing and Economic Land Availability Assessment, Paragraph: 019 Reference ID: 3-019-20140306

<sup>4</sup> [https://www.spelthorne.gov.uk/media/14264/SLAA-Methodology/pdf/SLAA\\_methodology6.pdf](https://www.spelthorne.gov.uk/media/14264/SLAA-Methodology/pdf/SLAA_methodology6.pdf)

broad brush assessment of land which, whilst considered comprehensive, does not go into the same level of the detail required for the site selection process. As such, the SLAA will provide the starting point for the assessment, helping to identify sites and guide the site selection process, however it is noted that this is a separate stage of the Local Plan and sites will be assessed against a number of different, more exhaustive criteria to assess their potential for allocation.

- 3.7 The SLAA considered the potential for development in the urban area and the Green Belt and on both previously developed land and undeveloped land. Under the presumption in favour of sustainable development set out in the NPPF, the starting point for identifying development sites should be brownfield land and sites within defined urban areas, unless there would be significant adverse effects as a result of granting permission.
- 3.8 In reviewing the SLAA to determine which should be taken forward to the site selection process, the following were considered:
- Sites were filtered out from the SLAA because they are a duplicate site; subject to extant planning permission; under construction; or being promoted for a non-housing or non-employment use.
  - Sites deemed not developable were filtered out, although part developable sites will be considered where they meet the size threshold.
- 3.9 Whilst SLAA sites which were identified in the Green Belt were generally not considered suitable to meet development needs given their existing Green Belt status, these were still included within the SLAA for audit purposes. SLAA sites which were identified in the Green Belt were appraised using the Green Belt Assessment Stage 1.
- 3.10 As set out in paragraph 136 of the revised NPPF, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation of plans. As such, all Green Belt sites in the SLAA will be subject to this assessment process as any sites that are considered suitable for future development requiring changes to Green Belt boundaries will need to be assessed through the examination of strategic policies.
- 3.11 Green Belt sites will be subject to slightly different criteria than those located in the urban area to account for their differing character, purpose and current functions. Where appropriate these will be made explicit in the following stages.
- 3.12 The SLAA is a live document and will be updated in 2019 to take account of any changes in circumstance and will include any newly identified sites. These sites will be subject to a comprehensive assessment to determine whether they are developable and subsequently if they should proceed to the site selection process. To be considered developable, sites should be in a suitable location for development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

#### **Stage 1b – Initial Sift: Absolute Constraints**

- 3.13 In order to ensure that those sites which could be considered reasonable alternatives are taken forward to Sustainability Appraisal, an initial sift of sites



will take place. Undevelopable SLAA sites will be removed as they are not considered to be reasonable alternatives.

- 3.14 To ensure consistency between this methodology and the Green Belt Assessment, this stage will include the same absolute constraints as the Green Belt Assessment stage 2.
- 3.15 The initial sift will focus on those sites which are entirely covered by an absolute constraint, or where a significant proportion of a site is affected. This will ensure that sites are not excluded in their entirety in stage 1 where alterations to a site boundary could be made to remove absolute constraints or where areas of absolute constraint could be considered for other uses i.e. open space.
- 3.16 To avoid duplication this assessment will take forward the conclusions of the Green Belt Assessment stage 2 regarding absolute constraints and other considerations where appropriate.
- 3.17 The initial sift will therefore focus on:

#### **Proximity to settlement**

- 3.18 Sites which do not fall within or adjoin the 250m buffer around a settlement. It is acknowledged that Spelthorne is a relatively small borough and most sites are considered to be located within a reasonable distance to a settlement. Qualitative assessment will therefore be undertaken to determine if any sites should be excluded at this stage.

#### **Flood Risk**

- 3.19 The NPPF and PPG clearly set out that development for housing/employment is not appropriate in the flood plain. Any sites which fall entirely or largely within Flood Risk Zone 3b (functional floodplain) will therefore be excluded.

#### **Sites of International, National and Local Importance**

- 3.20 The European Birds and Habitats Directive and the Conservation of Natural Habitats & Species Regulations set strong levels of protection for a number of designated sites. As such, sites will be excluded if they are wholly within an international or national including:

- Special Protection Areas (SPA)
- Special Areas of Conservation (SAC)
- Ramsar Sites
- Sites of Special Scientific Interest (SSSI)

- 3.21 Whilst not an absolute constraint, consideration will also be given to Sites of Nature Conservation Importance (SNCI) and consider if there could potentially be direct or indirect adverse effects on their ecological interest.

#### **Ancient Woodland**

- 3.22 Paragraph 175 of the NPPF gives strong protection to irreplaceable habitats including ancient woodland, therefore a site covered by ancient woodland will be excluded. It should be noted that there is only one area of ancient woodland located in Spelthorne: Round Copse in the Laleham area which is approximately 1.7 hectares.

### Public Safety Zone

- 3.23 The public safety zone at the west end of the southern runway at Heathrow Airport is defined by the Civil Aviation Authority. Sites that fall within this area will be excluded.

### Other Constraints

- 3.24 In line with the Spelthorne Green Belt Assessment stage 2, a number of other areas will also be excluded from assessment:
- Thames Water reservoirs, since these are operational water bodies and there has been no indication from Thames Water that this function will cease and therefore the land be available for potential release.
  - Sites in active use for churches, cemeteries and allotments.
  - Sites designated as common land.

### Site Size

- 3.25 Allocations should be those sites considered central to the achievement of the spatial strategy and Local Plan objectives, therefore it is not considered necessary to allocate every site.
- 3.26 Sites which do not fall into the definition of a major development will be excluded<sup>5</sup>. For housing sites major development is defined as where the number of dwelling houses to be provided is 10 or more or the development site is 0.5 hectares or more. For employment, major development is the provision of a building where the floorspace created is 1,000 square meters or more.
- 3.27 The proposed approach takes account of paragraph 68 of the NPPF, which recognises the contribution that small and medium size sites can make to the housing requirement.
- 3.28 Sites located within the Green Belt will not be subject to a site size threshold as it is only through the Local Plan that any amendments to the Green Belt boundary can be made.

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<sup>5</sup> Major development as defined in Part 1 of the Town & County Planning (Development Management Procedure)(England) Order 2015. Available at: <http://www.legislation.gov.uk/ukxi/2015/595/contents/made>

## 4. Sustainability Appraisal

- 4.1 A key part of the evidence base of the Local Plan is the Sustainability Appraisal (SA) which is a systematic process that must be carried out during the preparation of a Local Plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. The SA allows for the consideration of opportunities to improve environmental, social and economic conditions in the local area and identify how to mitigate the impact of development. The SA is generally applied as an iterative learning process running parallel to the Plan as it progresses.
- 4.2 All sites carried forward from the initial sift of sites will be subject to Sustainability Appraisal (SA). This is to ensure that sites which are deemed 'reasonable alternatives' are considered against the SA objectives to determine their sustainability.
- 4.3 Sites will be considered against the 12 SA objectives included in the Issues and Options SA<sup>6</sup>. This has been adapted from the 2017 Sustainability Appraisal Scoping Report<sup>7</sup>.

**Table 1: Sustainability Appraisal Scoring System**

Symbol	Effects against Sustainability Appraisal objectives
++	Significant positive contribution towards sustainability
+	Positive contribution towards sustainability
0	The option contributes neither positively nor negatively towards SA Objective
-	Negative contribution towards sustainability
--	Significant negative contribution towards sustainability
?	It is unclear whether there is the potential for a negative or positive effect on the SA Objective.

- 4.4 A reasoned justification based on professional judgement to support the score applied in each case will be provided. Consistent with the purpose of SA, the SA assessment will seek to identify the likely significant effects of development at each of the sites and where possible, will seek to identify ways in which the harmful effects of development could potentially be avoided or mitigated. It is

<sup>6</sup> [https://www.spelthorne.gov.uk/media/19049/Sustainability-Appraisal--Issues-and-Options-Final-Report/pdf/SA\\_Issues\\_Options\\_Sept\\_18.pdf](https://www.spelthorne.gov.uk/media/19049/Sustainability-Appraisal--Issues-and-Options-Final-Report/pdf/SA_Issues_Options_Sept_18.pdf)

<sup>7</sup> [https://www.spelthorne.gov.uk/media/17471/Sustainability-Appraisal-Scoping-Report/pdf/Sustainability\\_Appraisal\\_Scoping\\_Report.pdf](https://www.spelthorne.gov.uk/media/17471/Sustainability-Appraisal-Scoping-Report/pdf/Sustainability_Appraisal_Scoping_Report.pdf)

acknowledged that the Council is still at a relatively early stage of the plan making process therefore detailed site specific information may not yet be available. As such, where appropriate, consideration will be given to potential adverse effects and suitable types of mitigation measures rather than specific details or commitments.

- 4.5 SA testing will provide an initial measure of the relative performance of each site. Caution should be applied in seeking to 'sum' the assessment scorings against each of the SA Objectives, as this will not necessarily conclude which is either the most sustainable, or preferential. Equally, it is not appropriate, within the SA/SEA process to seek to weight any of the SA Objectives or decision-making criteria or to make judgments as to which significant effect is more important than others. The decision-making on which sites to take forward for potential allocation will need to be fully informed by the overall outcomes of the SA testing as a qualitative assessment, as well as by other evidence that emerges through or outside of the site assessment process.

## 5. Stage 2 Assessment

### Stage 2a – Contribution to the Delivery of the Strategy

- 5.1 As outlined in paragraph 23 of the NPPF, sufficient sites should be allocated through the Local Plan to deliver the strategic priorities of the area. As such, when deciding which sites to allocate, the Council will need to consider the extent to which a site contributes towards meeting the Local Plan objectives, fulfils the planning strategy and the extent to which they perform a strategic role. Strategic sites are those deemed necessary to the achievement of the Local Plan strategy. As such, what constitutes a 'strategic' site is specific to each local authority and their unique Local Plan and associated objectives.
- 5.2 Stage 2a of the site selection process is guided by the spatial strategy which will form the Local Plan. The spatial strategy focuses on the sequential use of land, which prioritises using brownfield land first then considers the most suitable Green Belt land following assessment. Following the Council's Issues and Options consultation, it was agreed with Members that Spelthorne would build on Option 4 in developing its spatial strategy:
- Increasing densities in town centres and near transport facilities and other areas where the character can accommodate it and allowing high rise development in areas where there are existing tall buildings and they are of a high quality design
  - Releasing some weakly performing Green Belt land for development where its release would not adversely affect the integrity of the strategic Green Belt. Any consideration of the potential release of Green Belt will have due regard for the sustainability of location and the quantity of previously developed land.
  - Making use of a Master Plan approach for Staines but with housing as one of a range of uses that can be accommodated within the town and not favouring residential development over employment, retail and tourism uses.
- 5.3 All sites that promote development and reach this stage of the assessment are likely to fulfil the spatial strategy to some extent, therefore each site will be appraised against a number of criteria. This will determine which sites are more or less likely to deliver the strategy. The list below is indicative of the type of factors that will be considered:
- Contributes to meeting the housing requirement
  - Meets specific identified needs (gypsy & traveller, affordable housing, older people accommodation etc.)
  - Opportunities for higher density development, where appropriate
  - Opportunities for infrastructure provision
  - Brownfield land (sequential identification of land<sup>8</sup>)
  - Opportunities for mixed use development
  - Other benefits provided by the site that are deemed to outweigh harm (such as but not limited to the provision of accessible open space, community benefits, environmental gains etc.)

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<sup>8</sup> Consideration will be given to the role of brownfield land in the Green Belt, in line with chapter 13 of the NPPF. This will form part of the qualitative assessment but will be further explored in stage 3b. Findings will be brought together in stage 4a.

- 5.4 The list above is not exhaustive in identifying the factors that will be considered in determining the extent to which a site helps to deliver the spatial strategy. A qualitative assessment will be undertaken based on the current available evidence and the opportunity that each site offers to deliver the strategy.
- 5.5 Using the qualitative assessment of the criteria in paragraph 5.3, an officer judgement will be made to score each site (Table 2). Additional commentary will be provided to explain how the scoring for individual sites was determined.

**Table 2: Spatial Strategy Scoring System**

Score	Criteria
1	The site does not contribute to the spatial strategy.
2	The site contributes somewhat to the spatial strategy.
3	The site contributes to the spatial strategy.

**Stage 2b – Non-Absolute Constraints**

- 5.6 Stage 2b will determine which sites are subject to non-absolute constraints. The degree of constraint will be considered and how this could impact any potential development. The constraints will be assessed using Table 3. Sites that score higher are deemed to be more suitable for development whilst those that score lower are deemed less suitable and are likely to require mitigation.

**Table 3: Non-absolute Constraints Scoring System**

Constraint	Score	Commentary
Flood risk	<p>1 – A number of flood risk issues/ high flood risk/ cannot be overcome.</p> <p>2 – low/medium flood risk issues/ can be mitigated.</p> <p>3 – No flood risk issues.</p>	<ul style="list-style-type: none"> <li>• More vulnerable uses (residential) permitted in flood zone 3a.</li> <li>• Highly vulnerable uses (G&amp;T pitches) permitted in flood zone 2.</li> <li>• Less vulnerable uses permitted in flood zones 2 and 3a.</li> <li>• Consider potential risk from ground water and surface water flooding.</li> </ul>
Minerals/ waste safeguarding	<p>1 – Site lies within safeguarded area or designated minerals or waste site. Development constrained.</p> <p>2 – Site has medium level potential to impact on existing and allocated minerals and waste sites.</p>	<p>Regard will be given to the Surrey minerals and waste plans to determine the extent to which any site will impact designations.</p>

Constraint	Score	Commentary
	<p>Constraints can be overcome.</p> <p>3 – Limited/ no impact on minerals or waste sites.</p>	
Biodiversity	<p>1 - The site performs an important function for biodiversity in the Borough/ The impacts on sensitive areas cannot be mitigated.</p> <p>2 - The site performs a somewhat important function/ Impacts on sensitive areas can be mitigated.</p> <p>3 - The site performs a limited biodiversity role/ there is no impact on environmentally sensitive areas.</p>	<p>The UK Biodiversity Action Plan groups habitats according to 'broad' and 'priority' habitats, both of which are present in Spelthorne. The priority habitats are:</p> <ul style="list-style-type: none"> <li>• Floodplain grazing marsh</li> <li>• Unimproved Meadows</li> <li>• Historic Parkland</li> </ul> <p>Broad habitats covered in Spelthorne are:</p> <ul style="list-style-type: none"> <li>• Standing open water and reedbeds</li> <li>• Urban environment</li> </ul> <p>Consideration will be given to the proximity of a site to a protected site or important habitat and the ability for indirect impacts. Consideration to be given to Biodiversity Opportunity Areas<sup>9</sup>.</p>
Agricultural Land Classification	<p>1 – Loss of Grade 1 or 2 land.</p> <p>2 – Loss of Grade 3 land.</p> <p>3 – No loss/ loss of grade 4 land or lower.</p>	<p>Poorer quality of land will be preferred to that of higher quality.</p>
Land and water contamination	<p>1 - The site is or may be affected by land contamination or landfill. The site will or may cause groundwater pollution. It is possible that it cannot be mitigated to an acceptable level.</p>	<p>GIS Mapping Environmental Health consultation</p>

<sup>9</sup> Biodiversity Opportunity Areas: The basis for realising Surrey's ecological network (2015) Surrey Nature Partnership. Available at: <https://surreynaturepartnership.org.uk/our-work/>

Constraint	Score	Commentary
	<p>2 - The site is or may be affected by land contamination or landfill. The site will or may cause groundwater pollution. It is possible that it can be mitigated to an acceptable level.</p> <p>3 - The site is unlikely to be affected by land contamination or landfill. The site is unlikely to cause groundwater pollution.</p>	
Heathrow Noise Contours	<p>1 – The site lies within the 66 Leq noise contour.</p> <p>3 – The site lies outside of the 66 Leq noise contour.</p>	Consideration will be given to the extent to which the site is subject to the noise impacts of Heathrow. It is noted that this could be subject to change with airport expansion.
Heritage Assets	<p>1 - Designated heritage asset on or adjacent to the site with harm to or loss of the heritage asset.</p> <p>2 – Heritage asset on or adjacent to site but no harm to it or its setting. Impacts can be mitigated.</p> <p>3 – Would not affect any heritage asset.</p>	<p>NPPF provides protection for heritage assets which should be conserved in a manner appropriate to their significance.</p> <p>NPPF para 194 lists heritage assets of the highest significance whereby substantial harm to or loss of assets should be wholly exceptional. Regard will be given to the ability to overcome harm.</p> <p>Consider the impact of on the setting of all other designated and non-designated heritage assets.</p>
Landscape Character & Townscape	1 – The site could have significant impacts on landscape quality & townscape and cannot be	Refer to Surrey Landscape Character Assessment <sup>10</sup> . Consider wider impact on

<sup>10</sup> Surrey Landscape Assessment (2015) had. Available at: <https://www.surreycc.gov.uk/environmenthousing-and-planning/countryside/countryside-strategies-action-plans-and-guidance/landscapecharacter-assessment>



Constraint	Score	Commentary
	mitigated to an acceptable level.	landscape and environment.
	2 – The site is within character area or would impact the townscape but could be mitigated to an acceptable level.	Consider townscape impacts.
	3 – The site is not within a character area or has limited impact on the townscape and landscape character.	

- 5.7 The significance of the impacts of each constraint will be assessed, as well as whether they can be overcome and whether enhancement opportunities exist. A qualitative commentary will be provided where required to highlight where any standards set out have been derived from or where further consideration is necessary.

#### Stage 2c – Open Space & Recreation Value

- 5.8 In line with the Issues and Options consultation responses received, the Council will give consideration to the open space and recreation value<sup>11</sup> of each site, as well as the extent to which it is publically accessible.
- 5.9 If a site is deemed to perform an important recreation role it will not be taken any further. This is in line with the revised NPPF at paragraph 97 which states that existing open space, sports and recreational buildings and land, including playing fields should not be built on unless the space is surplus to needs, the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality, or the development is for alternative sports and recreational provision whereby the benefits clearly outweigh the loss of the current or former use.
- 5.10 The emerging Spelthorne Open Space Assessment appraises the quality and quantity of open space in the Borough and will be utilised to determine the value of open spaces through this assessment process.
- 5.11 Table 4 sets out how sites will be scored. In addition to this, regard will be given to paragraph 97 of the revised NPPF and whether any proposals fulfil the development criteria. Where required commentary will be provided.

**Table 4: Open Space & Recreation Value Scoring System**

Constraint	Score	Commentary
Open space/ recreation value	1 – The site is of important recreational value/ would result in the total loss of an	Consideration will be given to the current role the site plays in

<sup>11</sup> Recreation value refers to the role a site plays in leisure. It is the experience that results from freely chosen participation in physical, social, intellectual, creative, and spiritual pursuits that enhance individual and community wellbeing.

and public accessibility	<p>area of open space with no replacement.</p> <p>2 – The site is of moderate recreational value/ would result in the loss of open space but some space could be retained or re-provided/ would not lead to loss of open space but no potential to provide additional space.</p> <p>3 – The site is not of important recreational value/ would not lead to the loss of an area of open space/ potential to provide additional open space.</p>	providing amenity space and its level of accessibility, as well as the opportunity to enhance existing space or provide new space. Consideration will also be given to the site's relationship with any existing open space.
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### Stage 2d – Sustainable Location

- 5.12 Stage 2d of the assessment will consider the accessibility of sites and the extent to which they are sustainably located. In line with the NPPF, sites will be assessed to determine whether they facilitate and encourage the use of sustainable modes of transport. Accessibility plays a critical role in assessing the relationship of a site to the settlement, key facilities, services and employment areas. The assessment will involve appraising each site against a range of accessibility standards as set out in Table 5. This will measure each site's journey time to a number of services.
- 5.13 Sites will also be considered in terms of their accessibility to major service and employment centres. This will be based on journey times and service frequency in peak hours using public transport. This will combine the walking distance to a public transport node (bus stop or rail station) with the time taken to reach the nearest major service or employment centre by that public transport mode. Peak hours are defined as weekdays 7am-9am and 4pm-6pm.
- 5.14 For the purposes of this assessment a major service centre is one which contains a main town centre of primary/secondary regional importance. Staines-upon-Thames is a secondary centre of regional importance however it should be noted that a site may be closest to a centre in a neighbouring authority which includes Windsor and Woking. Regarding centres of employment, this includes the Borough's designated employment areas, such as BP Sunbury or Shepperton Studios, as well as those areas of employment in neighbouring authorities. This includes but is not limited to the Colnbrook and Poyle Industrial Estates and Heathrow Airport.

**Table 5: Location Assessment Criteria**

Criteria	Score
Distance to primary school	<p>1 – more than 2km/25 minute walk</p> <p>2 – 800m - 2km/10 - 25 minute walk</p> <p>3 – less than 800m/10 minute walk</p>

Criteria	Score
Distance to secondary school	1 – more than 2.4km/30 minute walk 2 – 1km – 2.4km/15 - 30 minute walk 3 – less than 1km/15 minute walk
Distance to health centre or GP surgery	1 – more than 2km/25 minute walk 2 – 800m - 2km/10 - 25 minute walk 3 – less than 800m/10 minute walk
Distance to local convenience retail	1 – more than 2km/25 minute walk 2 – 800m - 2km/10 - 25 minute walk 3 – less than 800m/10 minute walk
Distance to major centres or centres of employment	1 – over 1 hour journey to any major or intermediate centre by public transport/ poor service 2 – 30 minutes to 1 hour journey time to employment area or major centre by public transport/ moderate service 3 – within 30 minutes of major centres or employment area by public transport/ good service
Distance to bus stop with good service	1 – more than 800m/10 minute walk 2 – 400 – 800m/5 - 10 minute walk 3 – less than 400m/5 minute walk
Distance to train station with good service	1 – more than 2km/25 minute walk 2 – 800m - 2km/10 - 25 minute walk 3 – less than 800m/10 minute walk

- 5.15 The now withdrawn Planning Policy Guidance 13: Transport (DETR, 2001) advised that 2km is the distance within which facilities are considered accessible on foot. The replacement NPPF does not provide any updated guidance on recommended walking distances. Planning for Walking (CIHT, 2015) advises that, “The power of a destination determines how far people will walk to get to it. For bus stops in residential areas, 400m has traditionally been regarded as a cut-off point...people will walk up to 800m to get to a railway station, which reflects the greater perceived quality or importance of rail services”.
- 5.16 This gives an indication of the walking distances people are likely to tolerate and these considerations have been used to determine the scoring system in Table 5. Generally 800m is considered to be the desirable walking distance, with 2km the preferred maximum.
- 5.17 The scoring of each site against the criteria in Table 5 will also be accompanied by a qualitative assessment where required to provide additional commentary and explain where there may be exceptions to the broad principles of the assessment process. There may for example be times when the distance to secondary schools exceeds the recommended walking distance. Account will be taken of the fact that there are fewer secondary schools in the Borough than primary schools. Whilst the National Travel Survey notes that walking is the dominant mode of travel to secondary schools (39%), 23% use local buses and

3% cycle. In addition, walking is the dominant mode of transport for journeys below 1 mile however for journeys above this threshold car use becomes the dominant mode of travel. Consideration will therefore be given to how these factors could impact journey time and distance. The assessment process will also at this stage differentiate between employment and residential uses as the criteria in Table 5 will apply to these uses differently.

- 5.18 Whilst this stage of the assessment will consider the provision of and distance to existing infrastructure, the qualitative part of the site appraisal will also look at any planned infrastructure that could impact on the site, in line NPPF paragraph 122. Due regard will be given to the certainty of any proposals.
- 5.19 In addition, the qualitative assessment and supporting commentary will give consideration to the opportunity each site provides to improve connectivity or provide supporting infrastructure. This may include potentially adding a bus stop on an existing route, or improving bicycle and pedestrian travel or the provision of community facilities. It will however be noted that smaller schemes are, by their very nature, less likely to be able to provide on-site infrastructure. Consideration will therefore be given to the potential cumulative impacts and any opportunities for provision where a number of smaller sites are located in close proximity.

## **6. Stage 3 Assessment**

- 6.1 Stage 3 of the assessment will apply to sites located within the Green Belt only.

### **Stage 3a – Green Belt**

- 6.2 The Green Belt Assessment stage 1 undertaken by consultants Arup on behalf of the Borough Council considered how the whole of the Green Belt in Spelthorne performs against the purposes of the Green Belt as set out in paragraphs 133 and 134 of the revised NPPF. The stage 1 assessment split the Green Belt into a number of reasonably large local areas and considered how each of these perform against the NPPF purposes and how they perform strategically.
- 6.3 The stage 1 report identified a number of land parcels for further consideration which either only weakly meet Green Belt purposes or not at all. Sites located in the Green Belt that were submitted to the Council's call for sites exercise were assessed against the results of the Green Belt Assessment stage 1 in the Strategic Land Availability Assessment. This included a high level assessment of the sites against Green Belt purposes as set out in the NPPF.
- 6.4 The stage 1 conclusions were taken forward into the Green Belt Assessment stage 2, which comprised a finer grained assessment of smaller areas of Green Belt. The stage 2 assessment refined land parcels to take account of a series of absolute and non-absolute constraints, as listed in paragraph 3.24, in order to identify more or less preferential parcels of land for potential development. Sites subject to these constraints were taken no further.
- 6.5 The stage 2 Green Belt Assessment did not re-examine every land parcel from the Stage 1 assessment but considered smaller parcels where they fell into or adjoined a 250m buffer zone around existing urban areas of Spelthorne. This is in line with paragraph 138 of the revised NPPF which states that local authorities must promote sustainable patterns of development.
- 6.6 In addition, when drawing up or reviewing Green Belt boundaries the NPPF states that local planning authorities 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. NPPF paragraph 139, bullet 1 sets out that boundaries should be defined to ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development.
- 6.7 As such, if sites in the Green Belt are allocated and hence an alteration to Green Belt boundaries made, consideration must be given to the achievement of sustainable development. This has already been considered to some extent through the Sustainability Appraisal and Stage 2 of this assessment. However, consideration must also be given to how a site performs against the purposes of the Green Belt as set out within the NPPF so that each site can be assessed in the round.
- 6.8 For the purposes of this assessment it is considered that areas of Green Belt which perform the most strongly against Green Belt purposes in stage 1 and 2 of the Green Belt Assessment also play a role in promoting sustainable

patterns of development as they maintain the pattern of settlements in the Borough and ensure that they remain distinct. The fundamental aim of Green Belt policy is to prevent urban sprawl and in doing so focuses development towards settlements.

- 6.9 As such, the Council will have due regard to the role that the strongest performing Green Belt parcels play in terms of contribution to the overall integrity, role and strategic function of the Green Belt.
- 6.10 When identifying potential site allocations in the Green Belt, NPPF paragraph 139 will be taken into account, which includes ensuring consistency with the Local Plan strategy for meeting identified requirements for sustainable development. A professional judgement will be made on the merits of each site in selecting those to take forward to ensure that development supports the Local Plan strategy. This will take account of the Green Belt performance of each site as well as the extent to which environmental constraints and accessibility would facilitate sustainable development. These factors will be weighed up and commentary provided to identify the most suitable sites for allocation.
- 6.11 The scoring derived from the Green Belt Assessment stage 1 and 2 will be accompanied by a qualitative assessment, however it should be noted that non-absolute constraints will be considered in stage 2 of this assessment. Consideration will be given to whether a site performs a 'rounding off' function to a settlement or is infill, to ensure that settlements remain compact and protects the remaining Green Belt. Regard will be given to the strength of any potential new defensible boundaries. Although open space will be considered through Stage 2c of the site selection process, in line with paragraph 138 of the NPPF, consideration will be given to ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.
- 6.12 Sites submitted to the call for sites as well as those sub areas assessed through the stage 2 assessment will be appraised. This is to ensure that the most sustainable land located within the urban buffers is considered through the Local Plan.

**Table 6: Green Belt Assessment Scoring System**

<b>Green Belt Assessment Stage 1</b>	
<b>Score</b>	<b>Criteria</b>
1	Strongly performing Green Belt
2	Moderately performing Green Belt
3	Weakly performing/ local area for potential sub-division
<b>Green Belt Assessment Stage 2</b>	
<b>Score</b>	<b>Criteria</b>
1	Strongly performing Green Belt/ important
2	Moderately performing Green Belt

3	Weakly performing Green Belt/ less important or partly less important/ recommended for consideration
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### Stage 3b – Previously Developed Land

- 6.13 The Green Belt Assessment, at both stages 1 and 2, has already given some consideration to previously developed land, however this has largely been in relation to openness and the presence of built form through Green Belt purpose 3. The Green Belt Assessment calculated the percentage of built form present on each local area and then undertook a qualitative assessment of character.
- 6.14 In order to avoid duplicating purpose 3 of the Green Belt Assessment, the site selection process will build on this work and will provide a qualitative appraisal of sites in order to further explain how the presence of PDL may impact development potential. Sites will not be discounted if they do not contain a significant quantity of PDL but those that are PDL and are sustainably located will be preferred in the first instance. This is to reflect the responses received to the Issues and Options consultation which accepted the need to release some Green Belt land but desiring to protect the most open and strongest performing Green Belt.
- 6.15 Stage 3b will encompass a qualitative assessment which will help to determine a score to assist with the site selection process. Table 7 shows the criteria by which sites will be assessed. In addition to the scoring, consideration will also be given to the existing use and its current value. Sites will be compared against one another to determine which are more or less preferable for development.

**Table 7: Previously Developed Land Scoring System**

Score	Criteria
1	The site is less than 10% previously developed land/ The site is less preferable for development.
2	The site is 10-25% previously developed land/ The site is somewhat preferable for development.
3	The site is 25% or more previously developed land/ The site is more preferable for development.

### Stage 3c – Visual Amenity

- 6.16 Paragraph 141 of the revised NPPF states that “Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land”. Whilst many of these criteria will be considered through previous stages of this assessment, the Council will consider the extent to which development within the Green Belt may impact visual amenity in Stage 3c, although landscape will also be somewhat considered due to the

interconnected nature of the two elements. Regard will also be given to opportunities to mitigate impacts and enhance landscape and visual amenity.

- 6.17 Openness has been assessed through the Green Belt Assessment, which has a dimension relating to visual impact. Whilst the Green Belt Assessment makes the distinction between openness and landscape, elements of landscape assessment have been used to assist in assessing Green Belt.
- 6.18 The visual dimension of the openness of Green Belt does not exhaust all relevant planning considerations relating to visual impact when considering proposals for development in the Green Belt. Development located in the Green Belt may be visually detrimental to neighbouring properties by reason of siting, scale or design, therefore the extent to which the development of any site within the Green Belt could impact visual amenity will be assessed.
- 6.19 Regard will also be given to the extent to which visual amenity may be improved through the development of a site and whether any negative impacts could be mitigated.
- 6.20 There are no established, measurable technical thresholds for considering visual impacts and significance of change. The Council has therefore developed a logical process for assessing the impact of development on visual amenity. It is acknowledged that assessing visual amenity is largely subjective therefore officer judgement will be utilised based on the current available evidence to evaluate the potential impact.
- 6.21 It should be noted that whilst an assessment of visual amenity will take place as part of the site selection process, there is no “right to a view”. The assessment of visual amenity is not an absolute constraint and while due regard will be given to visual impact it will be weighed against other assessment criteria in order to identify potential development sites.

### **Determine the Baseline**

- 6.22 The first stage of the assessment of visual amenity will be to determine the current baseline. This will involve gathering factual information about the site to set out its current visual impact. Included within this stage will be recognising the current landscape, noting any valued features, existing vegetation and infrastructure such as power lines, built areas and existing roads.
- 6.23 An initial assessment of perceptual characteristics will also be undertaken at this stage. This will include the perceived sense of tranquillity, remoteness and rural character. It is acknowledged that these points are somewhat subjective therefore an informed officer judgement will be made.
- 6.24 Aerial mapping will be used to determine current viewpoints into the site initially. This will be followed up by site visits and additional research where appropriate. This will be representative of a range of views and visual receptors. The following points will need to be considered:
- An even spread within the visual envelope
  - Representative from human field of vision
  - Range of near, middle and long distances
  - Public and private viewpoints (representative views from public vantage points due to restricted access to private properties)



- 6.25 Consideration will be given to the current visibility of the site and whether existing features such as walls, fences, buildings or hedges perform a screening role. The visibility of the site will be assessed as follows:
- Truncated/ no view: no view of the site/ difficult to perceive;
  - Partial view: part view of the site/ filtered view of the site, or a distant view where the site is perceived as a small part of view
  - Open view: clear view of significant proportion of wider landscape
- 6.26 Once the existing visibility of the site has been assessed, consideration will be given to the sensitivity of the site and the wider landscape. This means looking at the extent to which it can accept change of use and scale without adverse effects on its character. Consideration will be given to the likely congruency of the proposed change and the extent to which potential redevelopment of the site may fit or be 'visually absorbed' into the existing landscape.

### **Assess the Significance of Visual Impacts**

- 6.27 Consideration will then be given to the significance of developing the site and the impacts on residential amenity. This will be done by looking at the sensitivity of the visual receptors and the magnitude of the visual impact.
- 6.28 The visual effect of a development on a view will depend upon a number of factors. These can be summarised as follows:
- The nature of the proposal
  - Its siting in the landscape
  - Its size
  - Its detailed design
  - The position and distance from which it is viewed
- 6.29 Whilst it is accepted that not all of the above information will be available to the Council at the time of the assessment, an officer judgement will be made to assess the likely impacts. Consideration will therefore be given to the likely impacts resulting from the proposed development, based on similar typologies where appropriate.
- 6.30 'Visual Receptors' describes the particular groups who are likely to be affected. The sensitivity of visual receptors in terms of views will be dependent on:
- The location and context of the viewpoint
  - The expectations and occupation or activity of the receptor
  - The importance of the view (which may be determined with respect to its popularity or the number of people affected, or the current recreational role of the site)
- 6.31 The most sensitive receptors may include:
- Residential properties
  - Important public sites used by many people
  - Public rights of way or public open spaces
- 6.32 'Magnitude of impacts' relates to the extent of the impact and considers the following points:
- The scale of change in the view with respect to the loss or addition of features and changes in its composition
  - The degree of contrast or integration of any new features or changes in the landscape with the existing or remaining landscape elements

- The duration and nature of the effect and whether it is temporary or permanent
- The angle of the view in relation to the main activity of the receptor
- The distance of the viewpoint from the proposed development
- The extent over which the changes would be visible and the nature of the view
- The extent of view that would be occupied by development
- Whether the view is transient i.e. from a moving vehicle, or is direct

6.33 Taking into account the sensitivity of receptors and the magnitude of the visual impact, an assessment of the significance of visual impacts will be made. Significance is not absolute and can only be identified in relation to each individual development and its unique location. This will include assessing the degree of change in view experienced by the observers. It is important that any assessment adopts an informed and well-reasoned judgement, supported through a clear justification as to how the conclusions about significance for each effect have been derived.

6.34 Where there are highly sensitive receptors and there is a higher magnitude of visual impact, there is likely to be a greater significance of visual impact. A high significance of effect would result from high sensitivity receptors such as residential properties and public rights of way where they would receive a major change in the view. A low significance of effect would be from the least sensitive receptors, such as transport corridors, as viewers would be affected for a smaller period of time as they would experience transient views. Table 8 sets out the process for assessing visual amenity.

**Table 8: Significance of Impacts on Visual Amenity**

Assessment of significance impacts on visual amenity		Visual receptor sensitivity		
		High (Residential properties with views from ground and first floor windows; important public sites; Public RoW/ open spaces)	Medium (Commercial premises; schools; playing fields; other areas where the view is not central to the use)	Low (Roads and rail with views towards the site)
Magnitude of visual impact	<b>Dominant</b> (Highly significant deterioration in existing view)	Major	Major/ High	Moderate
	<b>Considerable</b> (Somewhat significant deterioration in existing view)	Major/ High	High	Low
	<b>Noticeable</b> (Perceptible deterioration in existing view)	Moderate	Moderate/Low	Low/ Negligible
	<b>Imperceptible</b> (No discernible deterioration in existing view)	Low	Low/negligible	Negligible

- 6.35 Prior to scoring each site, consideration will also be given to the ability to include mitigation measures and where this could potentially reduce the significance of the visual impact. Narrative will be provided where this has influenced a site's score.
- 6.36 Table 6 below sets out the assessment criteria. Given the qualitative nature of this subject, using the assessment process as set out above, a planning judgement will be made regarding the value of each site in providing visual amenity. Commentary will accompany the assessment result to explain how the scoring was determined.

**Table 9: Visual Amenity Scoring System**

Score	Criteria
1	The site performs a significance role in terms of visual amenity. The significance of the visual impact is high.
2	The site performs a moderate role with regards to visual amenity. The significance of the affect is moderate.
3	The significance of the affect to visual amenity is negligible/low.

## **7. Stage 4 Assessment**

### **Stage 4a – Overall Performance of Sites**

- 7.1 Stage 4a will bring together the findings from Stage 2 and 3 of the assessment and the conclusions from the Sustainability Appraisal. The combined results of this will determine which sites are to be taken forward. If a site performs poorly in the Sustainability Appraisal it will not be taken forward to look at Deliverability.
- 7.2 A table will be produced setting out the overall assessment scores of each site against the various stages. These will then be quantified to determine which sites are most suitable for potential allocation. This table will help to consider the balance between protection of the Green Belt and need for sustainable development.

### **Stage 4b – Deliverability**

- 7.3 Following the consideration of suitability through the previous stages of the assessment, Stage 4b will then confirm whether each site is deliverable/developable as required by the NPPF in terms of availability/achievability. Consideration will also be given to the potential phasing of development and how this would impact delivery.
- 7.4 Officers will need to seek confirmation from landowners/promoters that sites are available for development. The SLAA will give the most up to date indication of site availability, however there may be instances where there has been a change in ownership, agent representation or circumstance since the call for sites which means that officers will need to reconfirm availability. Where necessary consideration will be given to whether there is an opportunity for the Council to exercise its compulsory purchase powers if this would be in the public interest. This will be determined on a case by case basis.
- 7.5 Officers will also need to confirm if there is any appetite from landowners to develop Green Belt sites assessed through the Green Belt assessment stage 2 that were not promoted to the call for sites. Where sites are deemed to be weakly performing Green Belt and score strongly in the assessment availability will be checked.
- 7.6 Officers will consider all available evidence in determining whether the development of a site would be viable.

### **Stage 4c – Site Capacity**

- 7.7 Once it has been established if a site should be taken forward as a potential allocation in the Local Plan, an assessment of capacity will be undertaken to establish how much development a site can bring forward. This will depend on the location and local character, type of development promoted, mix of units, density assumptions as well as any factors which will reduce the developable area such as provision for green space or avoiding floodplain and/or other areas of constraint.

- 7.8 This will be informed by landowner discussions, the high level assessment made in the SLAA and officer judgement.