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Appendix 6

Strategic Land Availability Assessment: Developer Panel Representations

This statement sets out comments received and the Council's response to Surrey Heath Borough Council's Strategic Land Availability Assessment Developer Panel.

The Developer Panel ran for two weeks from Monday 31st July to Monday 14th August.

Responses to the Draft Strategic Land Availability Assessment

Responding Organisation	Summary of Comments	Council's Response
Bell Cornwell	<p>SLAA Site 153 – Land South of Fenns Lane, West End</p> <p>Within the SLAA assessment the site availability is marked down as 'unknown', however the availability of the site is known and was explicitly outlined in the Call for Sites. The site is family owned and is not subject to any restrictive covenants. Therefore, despite there being 4 part-owners of the site, the family connection makes the situation very different to that if the site were owned by 4 acquaintances. The assessment does note that the owners are willing to sell, an important factor when looking at its availability. The site is not restricted by any physical factors which might affect its availability, in terms of access or existing use. It should therefore be concluded that the site is genuinely available, as opposed to 'unknown'.</p> <p>We do not believe that the Council has properly assessed the achievability of the site against these factors. Instead the achievability section of the assessment focuses on selective elements, including the Green Belt, Previously Developed Land (PDL), and Thames Basin Heath SPA. These elements relate more to policy factors rather than the factors outlined in the methodology.</p> <p>A more wholesome assessment of the site achievability would have revealed other factors such as the high achievability due to there being no significant abnormal development costs and no requirements for significant infrastructure investment. The site already has access to a range of infrastructure provisions,</p>	<p>Noted. The site will be listed as 'available'.</p> <p>The achievability of sites has been assessed in line with the Methodology set out in the PGG. Paragraph 3.7 of the SLAA Methodology reflects this approach. As such the assessment has had regard to policies in the NPPF and the adopted Local Plan, including environmental amenity impacts, which would include impact of development on the Thames Basin Heaths SPA. This Methodology was peer reviewed by the Planning Advisory Service.</p> <p>In respect of achievability, the site has been assessed in line with the Methodology set out in the PPG. Paragraphs 3.10 and 3.11 reflect this approach.</p>

Responding Organisation	Summary of Comments	Council's Response
	<p>including water, electricity, sewerage, and gas. Our client is also flexible in the delivery of any housing, hence why in our original submission it was outlined that it all could be developed out at the same time or in a phased manner, as appropriate.</p> <p>We do not dispute that in line with current policy, falling within the Green Belt, residential development of this site would constitute inappropriate development. However, as part of the process of preparing a new Local Plan the Council needs to identify land that may have potential for development, including sites in the Green Belt. Sites that are submitted in the SHLAA will serve as part of the borough's evidence base, documenting Surrey Heath's land supply to 2032. The NPPF allows for alterations of the Green Belt through the preparation or review of the Local Plan (paragraph 83). This exception is subject to local authorities taking into account sustainable patterns of development. Therefore, baring this in mind the Council should, through the preparation of the new Local Plan, be considering Green Belt sites put forward in the SHLAA. Especially sites such as this which are located on the edge of settlement boundaries.</p> <p>The Council's assessment of the deliverability is that because much of the site is Green Belt and undeveloped that it should not be considered deliverable. This assessment has then led them to base the capacity on the 'PDL areas only', leading to the assessment being very different to the information submitted by Bell Cornwell. Through only considering the PDL areas, it dramatically alters the assessment of the site. The Council have only assessed the capacity of the site for 30 residential units despite our submission outlining 100 (approximately).</p>	<p>The site has been assessed in line with national and local plan policy on the Green Belt. It is not for the SLAA to determine how the Green Belt functions.</p> <p>The site has been assessed in line with the NPPF in relation to in the Green Belt. The Draft SLAA indicated the potential for 30 dwellings on the two PDL areas the site contains. The SLAA assessment is based on the provision of smaller dwellings, following the outline of the buildings on the two areas shown in the Call for Sites submission.</p>

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	<p>In our original submission, we emphasised the delivery of housing predominantly outside Flood Zone 2 and 3, and being location in the areas of the site more than 400m from the Thames Basin Heaths SPA boundary. These points are not mentioned in the Council's assessment, but are crucial to our case.</p> <p>In our submission, we made clear the capacity of the site to deliver additional SANG in connection with residential development. The important part of this is 'in connection with', whereby one would not come forward without the other. Despite the Council drastically cutting the number of housing units, the SANG area remains the same; however, the Council must acknowledge that without a sufficient number of residential units coming forward on the site, the 4ha SANG would not be deliverable</p> <p>The assessment makes the remark that 'due to the range of issues discussed, it is not considered that the site will come forward in the short to medium term'. From our perspective, the client is willing and able to deliver and bring this site forward. In the next steps of the Local Plan process it falls on the Council to determine whether the site is suitable for release from the Green Belt, which we believe it is.</p>	<p>These factors will be noted in the updated site assessment.</p> <p>The revised SLAA assessment will note that SANG would only be available, subject to the number of dwellings accommodated on site.</p> <p>Noted. The purpose of the SLAA is not to determine whether land should be removed from the Green Belt, or not.</p>
Leigh & Glennie Ltd	<p>SLAA Site 374 – Land at Pankhurst Farm, West End.</p> <p>I have concerns with how my client's site at Pankhurst Farm, West End (SLAA ref: 374) has been assessed as an 'Excluded' site. The conclusions of the appraisal do not follow the methodology set out in the SLAA.</p>	<p>Comments noted. The site has been reassessed having regard to the comments made. Revised assessment considers that the site could possibly take up to 6 dwellings on the site identified as Area A</p>

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	<p>...in short, it is only land within the Green Belt that is not previously developed which falls within the 'Excluded' definition. If the land is previously developed, then by definition – according to Appendix 1 – it is not 'Excluded' and should not be rejected: it falls within the categories of sites that paragraphs 2.16-2.17 of Appendix 1 say shall then be subject to detailed site surveys, and carried through to Stage 2 of the assessment process.</p> <p>The appraisal of Pankhurst Farm does not accord with the methodology as set out in the SLAA, and is inconsistent with how that methodology has been applied for other sites. It is a Developable site. The submission to the Council has shown that there would be the removal of the commercial uses, and the scheme would make the more efficient use of the land than the recent permission. The site is in one ownership and offers its own SANG, and so is also Deliverable.</p> <p>That is an incorrect appraisal of the site: as noted, paragraph 3.11 and Appendix 1 of the SLAA simply says that the Stage 1 Assessment will only reject sites within the Green Belt that are not PDL: there is no mention that there will be some form of subjective judgement at this stage regarding the character of such PDL, or the extent of proposed redevelopment. Simply put, paragraph 3.11 and Appendix 1 say PDL within the Green Belt means the site is not to be excluded at Stage 1. The Pankhurst Farm site must therefore progress to Stage 2 as a 'Developable' site, to then consider its potential to be a</p>	<p>in the Call for Sites submission and as such will be included in the SLAA. This is a basic assessment and will later require detailed bulk and mass calculations. The revised assessment considers the site to be deliverable within the 0-5 year period.</p> <p>The assessment indicates the provision of an on-site SANG. However, the number of dwellings both put forward in the site submission and the number of dwellings identified as Deliverable in the SLAA would not require on-site SANG. Nevertheless, it is noted that the submission indicates that land could be available as a SANG.</p>

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	<p>Deliverable' site.</p> <p>This is borne out by looking at the other sites in the West End area. The Land South of Fenns Lane (ref. 153) is also entirely within the Green Belt and is comparable to Pankhurst Lane since it contains commercial units.</p> <p>On this basis, the Land south of Fenns Lane is identified as a 'Developable' site, rather than an Excluded site, ie the mere existence of there being PDL on the Green Belt site is enough to tip the categorisation from 'Excluded' to 'Developable'.</p> <p>The Fenns Lane site is also recognised as having the potential for SANGS provision. Pankhurst Farm offers this opportunity too.</p> <p>The appraisal of Pankhurst Farm does not accord with the methodology as set out in the SLAA, and is inconsistent with how that methodology has been applied for other sites. It is a Developable site. The submission to the Council has shown that there would be the removal of the commercial uses, and the scheme would make the more efficient use of the land than the recent permission. The site is in one ownership and offers its own SANG, and so is also Deliverable.</p> <p>However, those matters are not taken into account in the same manner as the other sites, and the appraisal has not followed the Appendix 1 methodology. The SLAA appraisal has erroneously stated that the Green Belt designation 'trumps' the identification as a Developable site. The Pankhurst Farm site should therefore be included within the Developable and Deliverable category.</p>	<p>See first comment in response to the representation for Land at Pankhurst Farm. The revised assessment considers the site to be deliverable within the 0-5 year period.</p>

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Woolf Bond Planning	<p>SLAA Site 276 – Land East of Snows Ride, Windlesham</p> <p>In response to the below consultation I note that my client's site has been excluded despite it being submitted as part of the 1 March deadline.</p> <p>Can you please update your SLAA to reflect my client's site that was duly submitted in advance of the 1 March deadline? I attach relevant correspondence.</p>	<p>The site has now been included as part of the SLAA document.</p>
Persimmon Homes	<p>SLAA Site 346 - Pine Ridge Golf Course, Deepcut</p> <p>The SANG is of a sufficient size so as to support the development of the site and provide a length of walk to meet the requirements of Natural England.</p> <p>The site offers the potential for a substantial quantum of residential development to be delivered in phases over time, ensuring that the development has suitable mitigation provided for through SANGs.</p> <p>The redevelopment would be done over a period of time and could provide for circa 1,000 dwellings as part of the delivery of housing in Surrey Heath over the next 20 years.</p> <p>Persimmon Homes' land interest in the golf course also extends to the land on which the proposed SANG is and therefore Persimmon have the ability to deliver a suitable SANGS in this location. In addition to this, there is sufficient land available on the remainder of the site to be able to provide for SANGS land for further development at the golf course, in order to mitigate this.</p> <p>Important to the determination of whether this site is suitable for residential development is that it lies outside the Green Belt and will be able to provide a SANG to mitigate against the potential impacts of the development on the THB SPA. This should be looked upon favourably by the Council as 23% of the</p>	<p>In accordance with the Thames Basin Heaths Special Protection Area Avoidance Supplementary Planning Document (TBH SPA SPD), for new SANGs with no existing usage, the carrying capacity will normally be the 8ha per 1,000 population standard. For sites already in use (as applicable at Pine Ridge Golf Course), a discount will be applied to capacity, based on an assessment of current usage levels. Based on the area indicated as potential SANG on the map included with the submission, it would not support the quantum of development suggested in the original submission, or the renewed figure of circa 1,000 dwellings. Furthermore, some of the area indicated as SANG facilitates mitigation for the approved development at the Ridgewood Centre site, which is currently under construction. This would also need to be discounted.</p> <p>The achievability of sites has been assessed in line with the Methodology set out in the PGG. Paragraph 3.7 of the SLAA Methodology reflects this approach. As such the assessment has had regard to policies in the NPPF and the adopted Local Plan. Therefore, the</p>

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	<p>Borough is covered by THB SPA and the entire Borough lies within 5km of the TBH SPA.</p> <p>The first phase would be brought forward along with sufficient SANGS land and this is achievable within the next five years. As such, the part of the site for the first phase of development should be shown as deliverable on the SLAA.</p> <p>The remainder of the golf course could be delivered over a 15-20 year period and this would be brought forward in conjunction with the provision of suitable SANGS land. Due to this, the rest of the gold course land should be identified as developable within the SLAA.</p> <p>There is therefore no justification or sound reasoning as to why the site should have been excluded from the SLAA. It has been demonstrated that the site can support its own SPA mitigation unlike many other development sites within Surrey Heath. The site would be an excellent option for Surrey Heath to have. In the interests of positive planning as required by the NPPF, it would be detrimental to Surrey Heath for this site to be listed as excluded. The site should be identified as developable in the updated SHLAA going forward.</p>	<p>site has been assessed in line with spatial strategy in the adopted Core Strategy and Development Management Policies Development Plan Document (CSDMP DPD). For the number units submitted, the Council would expect detailed information regarding on-site infrastructure.</p> <p>The SLAA assesses the site in its entirety as to whether it is suitable, available and achievable.</p> <p>Appropriate SANGs mitigation for 1,855 units was not provided in the original submission. Suitable mitigation for the updated figure of circa 1,000 units has still not been demonstrated, in line with the TBH SPA SPD. Therefore the site cannot be included in the Deliverable or Developable supply. In addition, the infrastructure provision expected for a large/strategic site of the size has also not been included in the submission or this representation.</p>
Talbot Scott Ltd	<p>SLAA Site 386 - Land at Woodside Cottage, Chapel Lane, Bagshot</p> <p>What is concerning is the conclusion of the SLAA (and the recent appeal in Windlesham) which confirm that the Council does not have a five year supply of housing land. This means</p>	<p>The SLAA assesses sites at the given base date (31 March 2017). At this time, SANG capacity is not available to provide avoidance measures for</p>

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	<p>that the Council must look at new sites and ways of unlocking housing development. For example, development of new SANG land will enable to bring forward sites, and consent for this (in the near future) will render the results of the SLAA out-of-date. Whilst it is appreciated that a specific date does have to be the basis for appraisals, the fact that the document is a 'living' document, will need to be reflected in the next iteration.</p> <p>The "THAMES BASIN HEATHS SPECIAL PROTECTION AREA AVOIDANCE STRATEGY SUPPLEMENTARY PLANNING DOCUMENT" Of January 2012 published by SHBC as an adopted SPD states in Section 5 on page 12 the following; <i>"Surrey Heath will provide SANGs for new developments at a standard of at least 8 hectares per 1,000 head of population as set out in the JSPB Delivery 2013 Framework."</i> Surrey Heath Borough Council have failed to achieve this and as such even pre-existing allocations in Bagshot are being prevented from coming forward for development because of this failure.</p> <p>It is concerning that the conclusion of the SLAA and the Inspectors' conclusions in recent appeal decision in Windlesham confirm that the Council does not have a five year supply of housing land. This means that the Council must look at new sites and ways of unlocking existing allocations for housing development. For example, development of new SANG land will enable it to bring forward more housing sites, and any consent for this (in the near future) will render the results of the SLAA out-of-date. Whilst it is appreciated that a specific date does have to be the basis for appraisals, the fact that the document is a 'living' document, will need to be reflected in the next iteration.</p>	<p>development in excess of 9 units in Bagshot.</p> <p>This paragraph of the TBH SPA Avoidance Strategy SPD refers to the rates of SANG provision required in specifying the number of persons a SANG will provide mitigation for by area (ha).</p> <p>Noted. See comments above.</p>

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	<p>We also note that sites such as Fairoaks Airfield are not included in the document. Whilst the site may not have been formally submitted by the promoter of that development, it is clearly in the public domain and it is the purpose of the SLAA to proactively identify and consider sites even if they have not been formally submitted to the Council.</p>	<p>The Council will have consideration to all land availability in determining the housing requirement for the Borough.</p>
WYG	<p>SLAA Site 409 – Land at Latchetts Mead, Chobham</p> <p>However, whilst these potential constraint require further assessment an indicative timeline of 11-15 years to come forward seems unduly long term. The applicant is looking to bring these assessments forward, so subject to planning the site would be capable of being completed before the end of the first 5 years of the plan. Even with some delay it is highly unlikely to carry forward into the third plan period of 11-15 years.</p> <p>We would prefer the time period to show as 1-5 years, but the worst case would be 6-10. I should therefore be grateful if you would be able to adjust the indicative phasing for the site.</p>	<p>Noted. The assessment will be updated to take account of the comments received. As a result, the site will be included in years 6-10.</p>
Indigo	<p>SLAA Site 414 – Land North of Lakeside Drive, Chobham</p> <p>...we have previously reviewed all the Chobham sites in relation to the following criteria: location to the settlement area; current use; proximity to heritage assets; flood zone designation; nature conservation constraints; access and any other issue that may be unique to a given site.</p> <p>This exercise demonstrated that that our client's site (Land north of Lakeside Drive, Chobham) is the most sustainable Chobham site. It is not within or near to any nature designations, it is the site furthest from the Thames Basin SPA</p>	<p>The achievability of sites has been assessed in line with the Methodology set out in the PGG. Paragraph 3.7 of the SLAA Methodology reflects this approach. As such the assessment has had regard to policies in the NPPF and the adopted Local Plan, including non PDL in the Green Belt.</p>

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	<p>and there are no heritage assets nearby. The site is also entirely within Flood Zone 1 and access is available from both Guildford Road and Broadfield Lane. Whilst we note that the site is not immediately adjacent to the settlement boundary, it is within close proximity to the centre of Chobham. This is not an identified criterion to exclude the site from the SLAA.</p> <p>We consider that the current methodology to assess SLAA sites is flawed. There should be an automatic review of the pool of rejected sites in the SLAA where the councils housing supply falls below 5 years. This would ensure that the LPA were always able to monitor its 5-year housing land supply target. The methodology does not make any provision for this.</p> <p>The methodology does not provide opportunity to identify specialist forms of housing such as elderly accommodation or genuinely local housing which could be accommodated on our site if this SLAA methodology had more flexibility.</p> <p>The Council should look favourably towards these types of residential development as the 2014 SHMA identifies an ageing population as well as a growing young population. There is also a significant increase in the need for homes in the Borough rising from 191 dwellings per annum to 340 dwellings per annum. However, the SLAA methodology makes no provision for prioritising such housing need and thus reduces the prospects of such sites coming forward. The SLAA methodology should offset locational requirements against</p>	<p>Rejected sites are those sites submitted for less than 5 dwellings, which therefore fall below the threshold for sites to be included in the SLAA.</p> <p>Excluded sites are those sites either subject to major constraints as set out in the SLAA Methodology, or excluded in line with the policies in the NPPF and the adopted Local Plan, including non PDL in the Green Belt.</p> <p>Specialised forms of housing such as self-build, starter homes and C2 uses (Residential Institutions) are considered through the SLAA process, with some sites in the Draft SLAA document indicated for such uses. The SLAA Methodology sets provision for this (see para 1.5 of the SLAA Methodology).</p>

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	benefits of specialised provision.	
CGMS Heritage	<p>SLAA Site 444 – Land at Weston Paddocks, Bagshot</p> <p>We note that our clients site (SLAA ID Ref: 444) at Land at Weston Paddocks has been included in the draft SLAA as a deliverable site with a capacity of 9 units. This is despite the site benefiting from planning permission (Council reference 15/0141) for 10 units.</p> <p>The site was also allocated in the 2014 SHLAA as a deliverable site with a capacity of 17 units.</p> <p>Our client is currently preparing a scheme for a larger quantum of units and as such the site has a capacity of 18 units which should be reflected in the 2017 SLAA. This level of density is suitable in this location as it does not harm the character and appearance of the surrounding area.</p>	<p>The site was included as a Deliverable site with planning permission. The 9 units is a net figure, as the SLAA supply is calculated on the basis of net new units.</p> <p>Noted. The site is located within the settlement area of Bagshot which is an area of the Borough that does not currently have SANG capacity available for sites of 10 or more units. The Council will reassess the site having regard to the comments received, to demonstrate an indicative capacity if SANG availability were addressed. However, for the purposes of the SLAA housing figure, sites submitted in the 0-5 (Deliverable) period in this area must be capped at 9 (net) units in order to reflect the available SANGs capacity.</p>
WYG	Previous SLAA Site 688 – Castle Grove Nursery, Chobham	The site was not resubmitted in the 2017 Call for Sites. Landowners and agents are not contacted in relation to sites that were Excluded from previous SLAAs. The site has been submitted through this Developer Panel review, and as such is past the cut-off date for the 2017 SLAA. However, the site will be retained on file for assessment in future SLAAs.
Thakeham	SLAA Site 740 – Land East of Clews Lane, Bisley	

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	<p>Whilst we note the assessment's suggestion that the site could be utilised as a rural exception site, we can confirm within these representations that the site is available for residential development, with affordable housing provision that complies with policy (i.e. 40% in accordance with Core Strategy Policy CP5).</p> <p>In the site achievability section, the assessment refers to the site being non-PDL Green Belt land and as such "would be unsuitable for development". Whilst we note that the site is currently constrained by a Green Belt designation, it is our view as previously outlined in our SLAA submission (March, 2017) that Bisley is able to accommodate a higher level of planned growth, and as such the Council should consider releasing sites from the Green Belt in the emerging Local Plan. In respect of this, the SLAA assessment could consider the site suitability in respect of the purposes of the Green Belt (National Planning Policy Framework (NPPF), paragraph 80) rather than providing a blanket view across all non-PDL Green Belt sites. NPPF, paragraph 83 identifies that "local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy".</p> <p>In light of the above, it is our view that the Council should work proactively to assess suitable housing sites in sustainable locations in order to inform their emerging Local Plan and maintain a rolling 5-year housing land supply (HLS) throughout the plan period. Although constrained presently by the Green Belt designation, we consider that the Council should look to sustainable settlements such as Bisley to accommodate additional housing growth. Thakeham Homes Ltd have a</p>	<p>Noted.</p> <p>The achievability of sites has been assessed in line with the Methodology set out in the PGG. Paragraph 3.7 of the SLAA Methodology reflects this approach. As such the assessment has had regard to policies in the NPPF and the adopted Local Plan, including non PDL in the Green Belt.</p> <p>We note that the client does not want this site to be considered as a Rural Exception site. The site is not PDL in the Green Belt and therefore will be excluded from the SLAA assessment.</p>

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	<p>developer interest in the site and are actively promoting the site for residential development, rather than as an exceptions site. Albeit affordable housing will be provided on site in accordance with local policy. For the reasons outlined above, we confirm that Land at Clews Lane, Bisley is available, suitable and achievable, and therefore deliverable in accordance with the NPPG. As such, it is our view that the settlement boundary be amended in the emerging Local Plan to include this site to deliver much needed market homes and affordable housing in this sustainable village location.</p>	
Barton Willmore	<p>SLAA Site 751 – Longcross North (employment site)</p> <p>The draft SLAA indicates that land at Longcross North (i.e. Site 751) is 'Developable 6-10 years', as opposed to being 'Deliverable 0-5 years'. Crest and Aviva wish to emphasise the deliverability of their land at Longcross North such that the final SLAA should instead classify land at Longcross North as being Deliverable because it can come forward within 5 years.</p> <p>We disagree with this assessment and note that, land at Longcross North has been the subject of extensive ground investigation works in areas where a concern has been raised with regards to ground contamination associated with former military uses of the site. Site 751 is outside of any of these identified risk areas.</p> <p>We also disagree that consultation with Runnymede Borough Council could delay the delivery of development. Plans and proposals for land at Longcross North within Runnymede and immediately adjoining the Borough boundary are well established. A hybrid planning permission exists for the future</p>	<p>The previous submission for this site indicated "yes" in answer to the following question on the Surrey Heath Call for Sites pro forma: "Is the site contaminated or potentially contaminated from a previous or nearby use?" Furthermore, contamination was also noted as a potential abnormal development cost in the Call for Sites pro forma submitted to the Council. Therefore, the assessment of the site took account of this response. However, the assessment will be updated to take account of the additional information now provided regarding contamination at the site, advising the site is outside of identified risk areas.</p> <p>Noted.</p>

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	<p>redevelopment of Longcross North within Runnymede Borough.</p> <p>The ability to plan for employment development in Surrey Heath with some certainty as to how it will relate to that which is proposed within Runnymede, immediately adjoining the Borough boundary, will mean that consultations between the two authorities should be straight forward and not significantly time consuming.</p> <p>It is also considered that any consultations between the two authorities in relation to future planning applications for Site 751 will be fully capable of being completed within the defined determination period if the proposals for development are in accordance with the relevant planning policies for the site. Therefore it is expected that the development of the site could come forward within years 0-5.</p> <p>Crest and Aviva consider there is a reasonable degree of certainty that the land will come forward within a 5 year period for development upon the removal of the land from the Green Belt and its allocation for employment development.</p>	<p>Noted. The assessment will be amended for clarity to recognise that the development of this site will have to have regard to the wider development of the Longcross site within Runnymede rather than consultation with Runnymede Borough Council.</p> <p>The purpose of the SLAA is not to determine whether land should be removed from the Green Belt or not.</p>
D&M Planning Limited	<p>SLAA Site 796 – Bovingdon Cottage, Bracknell Road, Bagshot</p> <ol style="list-style-type: none"> <li data-bbox="555 1114 1330 1380">1. The decision to exclude the site is premature given the imminent appeal decision. Further the appeal process was well advanced at the time of the SLAA publication and SHBC cannot automatically assume that their reasons for the planning refusal will be upheld. There is nothing in the description alluding to the outstanding appeal or to suggest that, originally, this site was recommended for approval by SHBC. 	

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	<p>2. The ecology reports referred to are now available and were already available prior to the SLAA publication. The evidence of protected species relates only to bats and the ecological consultants have provided a suitable strategy for mitigation and compensation to protect them during construction. It is admitted that SHBC has consulted with SWT and they have raised no objection to the additional two separate protected species Phase 2 Survey reports relating to reptiles and bats. This means the development of the site can go ahead without harm to protected species or their habitats.</p> <p>3. The description for the planning refusal under the heading "Site Suitability" has been incorrectly stated. The second ground for refusal of the application for 3 dwellings at the site maintained that the number of dwellings constituted overdevelopment and was harmful to the prevailing character of surrounding dwellings and the openness and rural character of the Green Belt. However, this is PDL and, as such, already compromises the character of surrounding dwellings and the openness and rural character of the Green Belt. The commercial use as cattery and dog breeding kennels is legitimate and, whilst currently closed, could be re-opened at any time. In terms of volume and area comparisons the three proposed dwellings represent a reduction to the existing buildings compliant with the advice set out in the NPPF.</p>	<p>Noted. In response to paragraphs 1-3, the appeal at the site has now been allowed for 3 dwellings (2 net). This is below the 5 unit threshold for considering a site in the SLAA, in line with PPG guidance. As such, the site will be excluded from the SLAA. The assessment undertaken of the site in the SLAA, prior to the appeal decision indicated that it can deliver up to 2 dwellings.</p>

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	<p>4. Under the heading "Site Achievability" it is stated that the only access is to the A322 which connects to the M3 and input is required from SCC to determine the acceptability of such access. However, SCC has already been consulted on this subject through the planning application process. It concluded that "As such it is considered that the existing vehicular access would be adequate to serve the three proposed dwellings" and "I consider that the proposed residential development would result in a reduction of vehicular trips when compared to the existing commercial use". In addition, further measures were suggested to improve visibility and safety in respect of 3 dwellings. SHBC's statement within the assessment of Site ID 796 does not reflect the true highways position. Safe access can be provided for 5 net dwellings on the site.</p> <p>5. Indicative Phasing has been incorrectly assessed as it was made clear the 5-6 dwellings indicated within the site promotion could be delivered and built out within the 0-5 year plan period.</p> <p>6. The site comprises an existing dwelling (which can be replaced) and the remainder of the land is previously development land for the purposes of Annex 2 of the NPPF. The site is available, deliverable and suitable and should not be excluded from the SLAA. The appeal site visit has already been made by the appointed Inspector and the decision is due imminently. We will update you when received. but should be included for</p>	<p>Noted. The assessment will be updated to reflect the result of the consultation with SCC. However, the site will be excluded from the SLAA, accounting for the number of dwellings allowed on appeal and the SLAA capacity assessment.</p> <p>Noted. The site will be excluded from the SLAA, accounting for the number of dwellings allowed on appeal and the SLAA capacity assessment. Where a site is categorised as Excluded, phasing is not provided as it is not therefore applicable to the SLAA timescales.</p> <p>The site has been excluded having regard to the planning appeal decision which allowed 3 dwellings (2 net) at the site. This is below the threshold to be included in the SLAA, in line with the PPG.</p>

Responding Organisation	Summary of Comments	Council's Response
	<p>6 dwellings to include the existing one with availability between 0-5 years. No interim decision should be made to exclude the site until the planning appeal decision has been issued and, in any event, if the appeal is upheld, then the site, by necessity, will have to be included in the SLAA.</p>	
Talbot Scott Ltd	<p>SLAA Site 798 - Land at Pennyhill, Jenkins Hill, London Road, Bagshot</p> <p><u>1. Draft SLAA 2017 Main Report</u></p> <p>We contend that this timescale is incorrect and it is intended that this site should be brought forward for use as SANG within 0-5 years. Please note the 1 March 2017 'Call for Sites' submission made on behalf of the owner clearly indicates a 'First 5 Year Period (April 2016 – March 2021)' as a timescale for the availability of the site for use as SANG.</p> <ul style="list-style-type: none"> • There has been no recent communication between any officers or representatives of SHBC and Talbot Scott or any approach made by SHBC to the owners about this matter. • The potential availability of the site has already been brought to the attention of senior staff and members at SHBC. • Field studies and ecology surveys have been undertaken with a view to a planning application for 	<p>Noted. In the original Call for Sites submission for Site 798, the text in section 9, Additional Information stated "<i>The landowner has NOT committed to this use but would consider same.</i>" On this basis, the site was not considered to be available or achievable in the short term, which was taken account of in the indicative phasing for the site.</p> <p>We will seek to reconfirm with the agent as to whether the landowner has now committed to this use. If the owner confirms availability then the phasing can be reassessed.</p>

Responding Organisation	Summary of Comments	Council's Response
	<p>SANG use being submitted before the end of this calendar year. (2017)</p> <ul style="list-style-type: none"> • We can find no evidence or explanation as to how or why deliverability has been stated to be “11-15 years” • Furthermore, it is not made clear why the subject site should be ranked behind Land at Swift Lane 2 in terms of deliverability (stated as 'Developable 6-10 years') when the Swift Lane land ownership is by way of a Trust arrangement with multiple beneficiaries and therefore any deliverability of this site for low value land uses is questionable unless this is tied to other planning considerations on adjoining land in associated ownership. • The Land at Swift Lane 2 site is remote from the developed area of Bagshot or any other conurbation and therefore relies on additional car journeys being made by users of the site should it be developed as SANG. • Both Table 3.5 and the overall Draft SLAA do not include the current planning application for SANG use at Windlemere Golf Club (16/1207) which if successful would see an additional 15ha of SANG added to the projected figure almost doubling the potential availability of SANG land to in excess of 30ha for the plan period. <p>2. Draft SLAA 2017 Appendix 2, Bagshot Sites Assessment</p> <p>The statement within Appendix 2, Bagshot Sites Assessment under 'Site Availability' claiming that 'confirmation of commitment to this use is currently being sought from the owner' has no evidence in fact, no such contact has been</p>	<p>Noted. The SLAA assesses sites based on the information provided in the Call for Sites.</p> <p>Noted. The site at Windlemere was not submitted in the 2017 Call for Sites and does not currently benefit from planning permission.</p> <p>This statement refers to section 9 of the Call for Sites submission which advises, “<i>The landowner has NOT committed to this use but would consider same.</i>”</p>

Responding Organisation	Summary of Comments	Council's Response
	<p>made, please see above. In fact worse still, positive informal discussions have already taken place with Natural England over the potential use of the site as SANG.</p> <p>The potential impact on the 'Draft SLAA 2017' and thus the entire Surrey Heath 5 Year Housing Land Supply that this site could have if forward as SANG within the next 18 months to 2 years is considerable.</p> <p>The following sites within the 'Draft SLAA 2017 Appendix 2 Bagshot Site Assessments' document are all being considered at artificially low potential housing numbers limited to 9 units for each site purely due to the local authorities failure to provide and deliver adequate SANG for the Bagshot area.</p> <ol style="list-style-type: none"> 1. 134-136 London Road, (site ID.181), 2. Land to the rear of Half Moon Street & High Street (site ID.281), 3. Bagshot Manor, Green Lane (site ID.325), 4. Woodside Cottage, Chapel Lane (site ID.386), (Being held up due to SANG, but 40 units) 5. Land at Weston Paddocks, Whitmoor Road, (site ID.444), 6. Seal House, 56 London Road (site ID.714), 7. Queen Anne House, Station Road, (site ID.738) <p>All of these sites are deliverable and developable within a 5 year period and are capable of providing more than three times the housing numbers quoted in the Draft SLAA. Therefore it follows that if new SANG can be provided on the Pennyhill/Jenkins Hill site, or Windlemere Golf Club, or any other land within the Bagshot catchment area within the initial 5 year period then the entire Draft SLAA 2017 document will be incorrect and out of date.</p>	<p>Noted. The site is located within the settlement area of Bagshot which is an area of the Borough that does not currently have SANG capacity available for sites of 10 or more units. As such, sites submitted in the 0-5 (Deliverable) period in this area must be capped at 9 (net) units in order to reflect the available SANGs capacity.</p>

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	<p>The "THAMES BASIN HEATHS SPECIAL PROTECTION AREA AVOIDANCE STRATEGY SUPPLEMENTARY PLANNING DOCUMENT" Of January 2012 published by SHBC as an adopted SPD states in Section 5 on page 12 the following; "Surrey Heath will provide SANGs for new developments at a standard of at least 8 hectares per 1,000 head of population as set out in the JSPB Delivery 2013 Framework."</p> <p>Surrey Heath Borough Council have failed to achieve this and as such even pre-existing allocations in Bagshot are being prevented from coming forward for development because of this failure.</p> <p>It is concerning that the conclusion of both the SLAA and the recent appeal decision in Windlesham is to confirm that the Council does not have a five year supply of housing land. This means that the Council must look at new sites and ways of unlocking housing development. For example, development of new SANG land will enable it to bring forward more housing sites, and any consent for this will render the results of the SLAA out-of-date. Whilst it is appreciated that a specific date does have to be the basis for appraisals, the fact that the document is a 'living' document, will need to be reflected in the next iteration.</p> <p>We also note that sites such as Fair Oaks Airfield are not included in the document. Whilst that site may not have been formally submitted by the owner or promoter of the land, it is clearly in the public domain and it is the purpose of the SLAA to proactively identify and consider sites even if they have not been formally submitted to the Council.</p>	<p>This paragraph of the TBH SPA Avoidance Strategy SPD refers to the rates of SANG provision required in specifying the number of persons a SANG will provide mitigation for by area (ha).</p> <p>Noted.</p> <p>The Council will have consideration to all land availability in determining the housing requirement for the Borough.</p>

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	<p>As such, and given the above issues with the document, it is hard to support the current iteration as being a sound basis for developing planning policy.</p> <p>The opportunity exists to release immediately available housing land in Bagshot capable of providing three times the housing numbers quoted within the Draft SLAA simply by resolving the Local Authorities failed SANG provision.</p>	<p>In terms of new SANG provision, this will need to reflect the approach set out in the TBH SPA SPD, in particular to provide management and maintenance in perpetuity. If the SANG were to become available, the phasing and numbers of the Bagshot sites would be reconsidered in future iterations of the SLAA.</p>
Peter Weatherhead Planning	<p>SLAA Site 799 - Kingswood Pallets, Oldhouse Lane, Bisley</p> <p>We are writing in objection to the assessment of site 799 – Kingswood Pallets, Oldhouse Lane, Bisley, GU24 9DB – because we consider that the site assessment is flawed and seriously underestimates the site's capacity, wrongly excluding it from further consideration on this basis. Given that the Council cannot demonstrate a sufficient supply of housing and has a significant shortfall over the 15 year period, any site that can contribute to meeting the shortfall should be considered further.</p> <p>The site assessment methodology states that sites in the green belt that are not previously developed land are considered to be unsuitable. The Kingswood Pallets site is located in the green belt; however, 0.8ha of it is previously developed land and is covered with hardstandings, a number of buildings and pallet storage. This part of the site can accommodate around 24 dwellings at a density of 30 dwellings per hectare. The Council's site assessment comments that "it is not envisaged that the site could accommodate more than 2 dwellings without giving rise to a detrimental impact upon the openness of the</p>	<p>The achievability of sites has been assessed in line with the Methodology set out in the PGG. Paragraph 3.7 of the SLAA Methodology reflects this approach. As such the assessment has had regard to policies in the NPPF and the adopted Local Plan, including environmental amenity impacts, which would include impact of development on the Thames Basin Heaths SPA. This Methodology was peer reviewed by the Planning Advisory Service.</p> <p>The site has been assessed in line with the Methodology set out in the PPG. Paragraphs 3.10 and 3.11 of the SLAA Methodology reflect the PPG's approach.</p>

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	<p>Green Belt". No supporting analysis is provided but by email dated 7 August you confirmed that the site's capacity of less than 5 dwellings ruled it out.</p> <p>If the Council has undertaken any landscape impact assessment then we should be provided with it in order to comment upon it. We have asked for the background analysis but have been told that as this is not a formal consultation the Council is not entering into any site specific discussions.</p> <p>It is impossible to understand this conclusion and by any common sense assessment the site must be able to accommodate more than 5 dwellings which means that it should not be excluded from further consideration. Its acceptance as a housing site would also have the benefit of removing a potential 'bad neighbour' use which in the past has attracted a number of complaints.</p> <p>We contend that the site clearly has the capacity to meet the threshold for contributing to the housing shortfall. Two other issues were raised – flood risk and highway access – although your email implies that they did not amount to considerations that would exclude the site. However, Bellamy Roberts have been instructed to investigate these matters and they reach a similar conclusion. Their findings are appended.</p>	<p>The site is assessed on the basis of PDL areas only, owing to its location in the Green Belt. This in line with the SLAA Methodology, NPPF and adopted local plan policies.</p>
Barton Willmore	<p>SLAA Site 802 – Land at Four Winds, Camberley</p> <p>Although we are aware of the Area TPO which covers the site, a baseline tree survey has been undertaken to assess the quality of the trees on site. This survey indicates that a number of these trees are of low quality and value and that development could be achieved on site without affecting those trees with high quality and value. For reference, we have provided this baseline tree survey alongside this letter.</p>	<p>Noted. Consideration will be given to the tree survey. However, input from the Tree Officer would be necessary.</p>

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	<p>On this basis, we consider that development can be achieved on site within the indicated 0-5 year timescale, as was indicated within our Call for Sites proforma, and therefore request that the SLAA assessment for this site is amended to reflect this revised estimated delivery timescale.</p>	
WYG	<p>SLAA Site 812 – Land at Swift Lane, Bagshot</p> <p>The assessment estimates a delivery timescale of 6-10 years' time for the SANG land to come forward. The 8ha. SANG can be brought forward earlier than this due to the following:</p> <ul style="list-style-type: none"> • Following cessation of the use by Balfour Beatty as a site compound, the site would be restored and made available for use as a SANG; • The location of the proposed 8ha. SANG is highly unlikely to experience significant contamination due to local topography and drainage routes (which flow to the south-east). As a result, there is no pathway from the Swift Lane historic landfill site to the land proposed as SANG (phase 1); and • Surrey County Council has confirmed the existing site access can be used for the vehicular access to the proposed SANG car park. <p>As a result, it is asserted that the land proposed for an 8ha. SANG south of New Road can be delivered within 1-5 years.</p>	<p>Noted. Confirmation of the availability of the site compound including any mitigation required and confirmation regarding contamination could result in the site coming forward in the 0-5 year Deliverable period. This would be amended in future iterations of the SLAA. In terms of new SANG provision, this will need to reflect the approach set out in the TBH SPA SPD, in particular to provide management and maintenance in perpetuity.</p>
SCC Sites c/o Veil Williams	<p>Surrey County Council support the approach taken in relation to the sites listed in the table below, subject to a number of minor changes that specify a 'minimum' number of units, a</p>	<p>The SLAA provides an estimated capacity based on the information provided, site specific constraints and the character of the surrounding area.</p>

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	<p>point that has been raised by Inspectors in the recent Waverley Borough Council Examination:</p> <p>SLAA Site 240 - Camberley Centre, France Hill Drive Adult Education Centre, Camberley Suggest text change: 1. A 'minimum of 35 units'</p> <p>SLAA Site 770 - Camberley Branch Library, Knoll Road, Camberley 1. Available 0-5 years 2. A 'minimum of 54 units, high density' 3. Phasing 0-5 years not 6-10 years</p> <p>SLAA Site 247 - Bagshot Depot and Archaeology Centre, Bagshot 1. A 'minimum of 80 units at a high density' 2. '0-5 years' not 6-10 years 3. Residential or Extra Care</p> <p>SLAA Site 27 - Hillside Resource Centre and Portesbury School Suggest: 1. Residential and extra care 2. Clarify: Part of the Area Action Plan that shows a total of 80 units, 35 already delivered on the Police Station site adjacent 3. A 'minimum of 45 units' 4. '0-5 years' not 6-11 years</p>	<p>The figure of 54 units is noted and will be included as the capacity for this site. No alternative location or incorporation of existing library has been included in the proposal. Therefore 6-10 year period will be retained.</p> <p>Noted. Extra care use was proposed for this site in the 2017 Call for Sites and the site has been assessed for this use. C3 residential can be assessed in a future iteration of the SLAA.</p> <p>Noted. The site has been phased in the 0-5 year Deliverable period in the Draft SLAA. The site will be required to provide residential accommodation in line with its allocated in the Camberley Town Centre Area Action Plan</p>

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	<p>SLAA Site 801 - Pinehurst (Former) Care Home, Camberley Suggest:</p> <ol style="list-style-type: none"> 1. A 'minimum of 57 units' 2. '0-5 years' 3. Residential or Extra Care 	<p>Noted. Extra care use was proposed for this site in the 2017 Call for Sites. The site has been phased in the 0-5 year Deliverable period in the Draft SLAA. C3 residential can be assessed in a future iteration of the SLAA.</p>
<p>Howard Hutton & Associates</p>	<p>General comments</p> <p>A number of sites are included where the availability is not clear, some are within 400m of the SPA, some rely on potentially unwilling owners to make their land available only for affordable housing as part of the rural exceptions policy. Greater willingness to permit the inclusion of some market housing to subsidise the affordable housing may be required to address the latter issue if the identified Rural Exception sites are to come forward.</p> <p>It is not obvious how the 5 year land supply figure of 2118 in table 3.7 relates to the figures given in table 3.6. A breakdown of the 2118 figure would be helpful.</p> <p>It is also not clear where the windfall figures of 155, 134 and 88 shown in table 3.6 have come from. (Annex A only gives the methodology)</p> <p>Comparing the 2017 with the 2016 version it is noted that a number of site have disappeared. e.g. Camberley 9,23,29, 59, 205, 413, 527, 540, 564, 726, 728, 729, 730, 734, 744, 745, West end 764 Deepcut 712, 531</p>	<p>Where sites are located partially within the 400m buffer zone, residential development in this area of the site is excluded in deriving the site's capacity. No sites entirely within the 400m buffer zone have been included for residential use in the SLAA.</p> <p>As part of the 2017 Call for Sites, landowners were contacted where the site would only be suitable as a Rural Exception, advising that the site would be included in the SLAA on this basis, subject to their agreement.</p> <p>Noted. An additional table has been added into the SLAA Main Report for clarity.</p> <p>Noted. This is set out in Appendix 5 – Windfall Allowance.</p> <p>Noted. The primary reason these sites are not contained within the 2017 SLAA is, where writing to landowners and developers whose sites were previously included in the 2016 SLAA supply, the Call for Sites letter set out that they would need to confirm the site's availability in order for it to be</p>

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	<p>Frimley 223 Chobham 300 Windlesham 769, 766, 276, 767,</p> <p>It is assumed that some of these will have secured planning permission and development has since been completed so they are not retained under 'unimplemented' or 'under construction'. It might be worth checking there are no accidental omissions i.e. no sites 'have got lost'.</p> <p>The explanation of the categories has been helpfully improved but it is confusing to lump sites that are 'Rejected' because they are in principle unacceptable with those that are 'Rejected' because they are acceptable but too small to be counted in a SLAA. An additional category could be considered i.e. "possible windfall" which could then be referred to and help add credibility to the windfall calculations.</p> <p>There are also some suggestions which might improve the readability of the document. It would be useful if the coloured table giving a summary of all sites in each location (Appendix 2) had an additional column showing the site's capacity as this would enable the reader to easily see where the figures in tables 3.3 and 3.4 are derived from. If they are not included the reader has to go through every individual site assessment to see the contribution each site makes. It would also be helpful if the colouring used in these tables was lighter as the rather dark green, brown, red and orange makes the typing more difficult to read.</p> <p>Some minor points</p> <p>The figure for Bagshot in table 3.4 should be 165 not 145 (the</p>	<p>included in the SLAA assessment. This was to ensure that the SLAA is as robust as possible. Therefore, an opt-in approach was taken. However, we will also check once again to ensure no sites have been omitted.</p> <p>Noted. This will be amended in future iterations of the SLAA. The SLAA sets out that rejected sites are those that were submitted for less than 5 net units and sites that were excluded are those with major constraints or that are not in line with policy.</p> <p>Noted. The SLAA will be amended to reflect this.</p> <p>Noted and amended, where necessary.</p>

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	<p>total is correct once the figure of 165 is entered). The word 'summer' in para 3.1 is clearly a left over from the 2016 draft and could be deleted The expression "where accounting for their circumstances" in para 3.8 does not seem to make sense. Wording missing?</p> <p>Although the SLAA reveals a significant shortfall much of the supply is secure. Over 50% has planning permission or an approval under the prior notification procedure. However the shortfall will need to be addressed as a matter of urgency if the Council is avoid repeated planning by appeal.</p> <p>It has been suggested elsewhere that removing the larger villages that are washed over by the green belt and identifying a settlement boundary for each would recognise their built up nature and could permit some useful opportunities for expansion.</p>	<p>Noted.</p> <p>Noted. It is not the role of the SLAA to undertake this review.</p>