

## **Topic Paper 10: Local Plan Early Review**

### **1. Introduction**

- 1.1. This note sets out the background relating to the proposed modification to the emerging Local Plan 2024 - 2039, to include an early review policy (proposed MM12(24): Policy ST3: Local Plan Early Review). It sets out the reasoning behind the proposed inclusion of Policy ST3 and demonstrates the Council's commitment to undertake an early review of the Local Plan.

### **2. Background**

- 2.1. Following the Regulation 19 consultation, held during the summer of 2022, the Draft Spelthorne Local Plan was submitted to the Planning Inspectorate for examination on 25 November 2022. Following one week of hearing sessions in May 2023, an Extraordinary Council meeting was held on 6 June 2023, with the Council requesting that the Examination be paused. A complete summary of the journey of the Local Plan since this point can be found in Topic Paper 8: Progress Since the 2023 Examination Pause.
- 2.2. The Council initially wrote to the Inspector on 23 July 2024 requesting the resumption of Hearings following a decision by the Corporate Policy and Resources Committee to seek to progress the Local Plan back to Examination. Following significant progress to agree a Statement of Common Ground with the Environment Agency and the Council's decision to proceed with the green belt release sites as submitted, the Council then wrote again to the Inspector to request a resumption of Hearings on 25 October 2024.
- 2.3. Following the General Election in July 2024, a consultation on "Proposed reforms to the National Planning Policy Framework (NPPF) and other changes to the planning system" began on 30 July 2024 and ran to 24 September 2024. As part of this consultation, reforms to the way Local Housing Need is calculated were consulted on along with a spreadsheet setting out the new Local Housing Need based on the new formula. Based on the new proposed formula Spelthorne's Housing Need would increase from 618 homes per year to 755. At the time of writing, we await the publication of the new NPPF, however if the proposed reforms to the NPPF and the planning system were to be implemented as set out in the consultation draft, the Draft Spelthorne Local Plan can continue to be examined under the NPPF 2021, which was in force at the time the Local Plan was submitted for examination. This incorporated a local housing need figure of 618 per annum.
- 2.4. The Spelthorne Core Strategy and Policies Development Plan Document was adopted in 2009 and had a housing target of 166 homes per annum. Following the introduction of the NPPF and the need to objectively assess housing need, Spelthorne Borough Council produced a joint Strategic Housing Market Assessment (SHMA) with Runnymede Borough Council as the two authorities comprise a housing market area. The SHMA, published in 2015, then assessed Spelthorne's objectively assessed need as 552-757. The Government then introduced the standard method for calculating housing need in 2017. Using a base date of 2022, this produces a need figure of 618 homes per annum. The Council acknowledges that the current adopted Core Strategy and Development Plan

Document is out of date and past housing completion data<sup>1</sup> also shows the Borough is not currently meeting the required housing target of 618 homes per annum.

- 2.5. The most effective way to deliver housing and move sites forward is to progress the emerging Local Plan through to adoption but it is acknowledged that the Council will need to review and update its housing target in alignment with any new national planning policy. In addition to housing, as part of preparing the emerging Local Plan, other matters have also been identified such as Gypsy, Traveller & Travelling Show People Assessment, Employment Land Needs and a Supplementary Planning Document (SPD) on flooding these are set out in more detail in Policy ST3.
- 2.6. As set out in 2.3 the emerging local plan uses the methodology applicable at the time of submission to generate a housing requirement of 618 homes per annum. The Council has applied an additional 20% buffer to the first five years of the plan as required by para 79 NPPF Dec 2023<sup>2</sup> to account for past under delivery meaning a cumulative requirement totalling 9,888 across the plan period. The proposed future housing need figure increases to 755, as set out in 2.2 at the time of writing the revised NPPF has not been published but the Council acknowledges the need to review and update its existing housing need figure and plan positively for future housing growth.
- 2.7. The Employment Land Needs Assessment<sup>3</sup> is based on economic forecasts which estimate the growth in jobs in different sectors and translates this into an estimate for change in employment floorspace over the plan period. The assessment was published prior to the COVID-19 pandemic and the extent to which this has impacted on working patterns will need to be considered through updated evidence, it is likely that the Boroughs employment land needs have changed therefore this has been identified as a matter to be specifically addressed in Policy ST3.
- 2.8. In light of the above the Council is proposing the inclusion of Policy ST3 which commits to an early, whole plan review to commence by the end of 2026 that will allow the Council to consider longer-term requirements, including a number of specific issues identified through the production of this plan.

### **3. Commitment to Early Review**

- 3.1. Policy ST3 sets out the Council will undertake a comprehensive review of the whole Local Plan by the end of 2026. This will determine whether this plan needs to be updated either in whole or in part. All policies will be reviewed but with particular regard paid to the following matters that have been specifically identified during the preparation and examination of this plan: housing requirement, monitoring housing delivery, updating employment land needs assessment, updated gypsy traveller and travelling show people needs assessment and flooding SPD.
- 3.2. On the 3 December 2024, the Environment and Sustainability Committee considered the budget for the 2025/26 financial year. While final sign off for the budget will not be confirmed until Full Council meet on 27 February 2025, the Committee recommended the proposed growth bid to Council for approval, with the [report](#) noting that '*major revenue growth items relate to the expected early review of the Local Plan (assuming it is agreed by the Inspector and adopted.) £315k is required in 25/26 with £210k required in 26/27 to ensure we have an up-to-date evidence base*'. The growth bid recommended to Council for approval by the Environment and Sustainability Committee proposes a complete update of the evidence base over a two-year period, ensuring the Council has the appropriate, up to date evidence available to carry out a robust and timely review of the Local Plan.

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<sup>1</sup> [CD028-Authority-Monitoring-Report-2024.pdf](#)

<sup>2</sup> Para 74 NPPF 2021 applicable at time Local Plan was submitted for examination

<sup>3</sup> [ECN002-Employment-Land-Needs-Assessment-2018.pdf](#)

- 3.3. In actively seeking to resource and plan for updating the evidence base that will be required to support an early review of the Local Plan at the earliest opportunity the Council is demonstrating its commitment to not only moving forward to adoption with the Plan at Examination, but its understanding of the changing needs of the Borough and its commitment to an early review of the emerging Local Plan (assuming it's adoption) in order to meet the needs of the Borough for the future.