

Spelthorne Borough Council

Duty to Cooperate Compliance Statement Addendum

January 2025



Spelthorne Takes Shape



Introduction

- 1.1 The Borough Council submitted a [Duty to Cooperate Compliance Statement](#) as part of the Local Plan submitted in November 2022. This Statement of Compliance demonstrated how Spelthorne Borough Council met the Duty to Co-operate in the Spelthorne Borough Local Plan. It outlines the ways in which the Council has sought to engage effectively with representatives of other Duty to Cooperate bodies that are prescribed in the relevant legislation, as well as the ways in which the outcomes of the cooperation have informed the direction of the policies in the Local Plan.

Update since Local Plan submission Nov 2022

- 1.2 In the intervening period since November 2022 the Council has continued to engage with neighbouring authorities and all relevant bodies, this activity has been recorded and will be added as addendum to the Duty to Cooperate Compliance Statement. The addendum captures:
- Updated joint Statement Of Common Ground (SoCG) between Spelthorne Borough Council and London Borough of Hillingdon, London Borough of Hounslow, London Borough of Richmond upon Thames, Runnymede Borough Council, Slough Borough Council and Royal Borough of Windsor.
 - Updated SoCG between Spelthorne Borough Council and Elmbridge Borough Council to cover cross-boundary matters.
 - Agreed SoCG with the Environment Agency October 2024
 - Engagement with neighbouring authorities including duty to cooperate meetings held Oct and Nov 2024.
 - Cross boundary bodies and forums
- 1.3 The Addendum at January 2025 can be found below:

Addendum January 2025

The purpose of this addendum is to provide an overview of the ongoing joint working to satisfy the requirements of the duty to co-operate (the Duty) in preparing the Spelthorne Borough Council Local Plan since its submission in November 2022.

This addendum should be read alongside the full [Duty to Co-Operate Statement of Compliance November 2022](#), which was submitted to the Secretary of State alongside the Local Plan. This provides a detailed explanation of how cross boundary working has influenced the Local Plan, leading to positive outcomes and providing the foundation for proving that the relevant cross-boundary issues have been identified and addressed in showing how the Council has met the requirements of the Duty.

Joint Statement of Common Ground

In preparation for the examination hearings Spelthorne has updated the joint Statement of Common Ground (SoCG) with Duty to Cooperate partners to reflect any updates or activity since the joint SoCG was previously drafted in November 2022, this has been signed by all relevant parties (See Appendix A). Spelthorne has agreed to produce a separate updated Statement of Common Ground with:

- Elmbridge Borough Council to cover cross-boundary matters (Signed January 2025) (See Appendix B)

Ongoing engagement to week 1 hearing sessions

The Statement submitted in November 2022 set out the strategic matters for Spelthorne Borough Council including housing, employment, retail & leisure, infrastructure, transport, community facilities and Conservation and enhancement of the natural, built and historic environment.

In preparation for the hearing sessions, the Council agreed Statements of Common Ground with Neighbouring Authorities.

11 May 2023 the Council published Hearing Statements in response to the Planning Inspectors Matters, Issues and Questions. 19 May a group of Councillors wrote to the Inspector with regard to the possibility of pausing the Local Plan examination which was starting 23 May 2023. Following an Extraordinary Council Meeting on 6 June 2023 where a motion was agreed to pause the remainder of the Local Plan examination hearings, the Chief Executive wrote to the Planning Inspector to put forward this request on behalf of the Council.

Updates during period June 2023 until December 2024 when Local Plan examination paused

Local Plan

June 2023	Following the Extraordinary Council Meeting on 6 June 2023 where a motion was agreed to pause the remainder of the Local Plan examination hearings, the Chief Executive wrote to the Planning Inspector to put forward this request on behalf of the Council.
Sept 2023	Council held an Extraordinary Meeting on 14 September to consider a report which outlined three options on the future of the Local Plan. Councillors voted to “ <i>Extend the pause in the Examination timetable until the proposed changes to the National Planning Policy Framework have been published (expected in the autumn) before determining the next steps and take immediate legal advice to confirm the validity of the minister’s directive</i> ”. The Council then wrote to the Planning Inspector requesting this further pause on the 15 September.

Oct 2023	The Level 1 and Level 2 Strategic Flood Risk Assessment (SFRA) and Sequential Test were published to the evidence base.
Nov 2023	Council received further information from the Environment Agency regarding sites identified in the emerging Local Plan, specifically the flooding evidence that has been prepared. The Environment Agency have now been able to categorise each comment they have made regarding sites and evidence and have provided information on whether the feedback is critical or advisory. This document has been added to the flooding evidence base.
Dec 2023	The Council by request of officials at the Department of Levelling Up, Housing and Communities produced an indicative timeline for resuming the Local Plan examination hearings. 11 December the Leader of the Council, Cllr Joanna Sexton wrote to Lee Rowley MP Minister of State for Housing and Planning.
Feb 2024	2 February the Leader of the Council, Cllr Joanna Sexton wrote to Lee Rowley MP Minister of State for Housing and Planning. Council Environment and Sustainability Committee decided to propose modifications of the local plan to the planning inspector relating to removal of green belt sites, remove sites at high risk of flooding and move some higher risk sites to end of plan period and withdraw Staines Development Framework as a core documents.
March 2024	6 March the Chair of the Environment and Sustainability Committee, Cllr Malcolm Beecher wrote a letter to the Inspector. 19 March the Council received an updated Level 1 and Level 2 SFRA which was added to evidence base.
April 2024	12 April the Chair of the Environment and Sustainability Committee, Cllr Malcolm Beecher wrote a letter to the Environment Agency.
May 2024	2 May 2024 the EA wrote to the Council and summarised the main issues in the letter and providing detailed comments on the Level 1 and 2 SFRA in Appendix 1. 8 May 2024 the Chair of the Environment and Sustainability Committee, Cllr Malcolm Beecher wrote a letter to the Environment Agency in response. 17 May 2024 Strategic Planning wrote a letter to the EA. 24 May the Council received an updated Level 1 SFRA this has been added to evidence base.
June 2024	Council received an updated Level 2 SFRA this has been added to evidence base. Comments received on the updated SFRA from the EA requesting the removal of ST4/002 Bridge Street Car Park and ST4/010 Riverside Car Park.
July 2024	Additional comments received from the EA on Level 1 and Level 2 SFRA and confirmation from the EA that the removal of sites will satisfy one of their major concerns. A report on the resumption of the local plan examination has been published and the Council's Corporate Policy and Resources Committee is asked to make recommendations on 8th July 2024. 16 July 2024 the Council received an updated Level 1 and Level 2 SFRA this has been added to the evidence base. Following the recent meetings of Corporate Policy and Resources Committee and full Council, on 23 July 2024 the Chair of the Environment and Sustainability Committee, Cllr Malcolm Beecher wrote a letter to the Planning Inspector requesting resumption of the Local Plan Examination.
August 2024	6 August 2024, the Council's flood consultants Aecom received confirmation from the Environment Agency that the produced SFRA maps are using the latest modelling and are following the FD2320 guidance.
Oct 2024	Council received a signed Statement of Common Ground from the EA with agreed revised wording to Policy E3: Managing Flood.

	The Chair of the Environment and Sustainability Committee, Cllr Malcolm Beecher, wrote a letter to Inspector Bridgwater to let him know that the Statement of Common Ground has been signed, update him on next steps and request that we return to Examination.
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Meetings with Neighbouring Authorities (See Appendix C for meeting notes)

- Spelthorne/Hillingdon meeting June 2024
- Spelthorne/Hounslow meeting June 2024
- Spelthorne/Hounslow meeting October 2024 (See meeting note below)
- Spelthorne/Windsor meeting October 2024 (See meeting note below)
- Spelthorne/Slough meeting October 2024 (See meeting note below))
- Spelthorne/Surrey meeting October 2024 (See meeting note below)
- Spelthorne/Runnymede meeting October 2024 (See meeting note below)
- Spelthorne/Elmbridge meeting October 2024 (See meeting note below)
- Spelthorne/Hillingdon meeting November 2024 – (See meeting note below)
- Spelthorne/Richmond meeting November 2024 (See meeting note below)
- Spelthorne/Elmbridge meeting November 2024

Engagement with relevant bodies

- Environment Agency please see Section 4 of Flood Risk Topic Paper for detail
- Correspondence sent to relevant bodies that are not neighbouring authorities (See Appendix D)

Cross boundary bodies and forums

As set out in 2.7 of the [Duty to Co-Operate Statement of Compliance November 2022](#) Spelthorne Borough Council is a member of a number of bodies and forums which deal with cross-boundary issues. The list below sets out the bodies and forums that Spelthorne has engaged with during the period since November 2022:

Biodiversity Working Group
Heathrow Easterly Alternation Local Authorities Meeting
Heathrow Easterly Alternation Local Authorities Meeting
Heathrow Expansion Working Group
Heathrow Expansion Working Group
Heathrow Spatial Planning Group
PWG/Mole Valley meeting
RTS/LPA Co-ordination meetings
Spelthorne Borough Council/Surrey County Council Joint Infrastructure Group
Surrey Flood Risk Partnership Board
Surrey Health and Planning Development Day
Surrey Health and Planning Forum
Surrey Planning Working Group

Appendix A: Joint Spelthorne Statement of Common Ground (January 2025)

**Spelthorne Borough Council
Local Plan**

Joint Statement of Common Ground

Version 2, Date: January 2025

Current local plan review stage: Local Plan Examination Hearings

1. Introduction

1.1. This Statement of Common Ground (SoCG) sets out how Spelthorne Borough Council (Spelthorne BC) has ensured that its Regulation 19 Local Plan and subsequent Regulation 22 Submission Local Plan has been prepared on the basis of effective joint working on strategic cross-boundary matters, in line with both the statutory duty to cooperate, as imposed by Section 110 of the Localism Act which inserted section 33A into the Planning and Compulsory Purchase Act 2004. This SoCG additionally covers the period since November 2022 capturing any relevant updates and activity. The SoCG outlines: the key strategic matters being addressed by the statement; the plan-making authorities and other bodies responsible for joint working; governance arrangements for the cooperation process; a record of where agreements have (or have not) been reached on key strategic matters; and any additional strategic matters to be addressed by the statement which have not already been addressed.

Spelthorne Borough Council – Local Plan

1.2. The Spelthorne Core Strategy was adopted in February 2009 and in 2014 the Council began a review of the Plan. Since the start of the Local Plan review, the Council has regularly engaged with neighbouring authorities and relevant stakeholders on strategic matters. The Council has progressed with its Local Plan review and has carried out Regulation 18 and Regulation 19 consultations. The draft Local Plan was submitted to the Secretary of State in November 2022 and examination hearings began in May 2023. The Council then requested a pause of Hearings which was agreed by the Planning Inspector in September 2023. This SoCG covers relevant updates and activity since November 2022.

1.3. This SoCG has been prepared in accordance with Paragraph 27 and 28 of the NPPF (December 2024)¹ in order to demonstrate effective and on-going joint working on strategic cross-boundary matters and will be maintained in

¹ At time of submitting Local Plan for examination NPPF 2021 was in force and used to produce the SoCG signed 2022.

order to document how these matters are being addressed and what progress has been made thus far. The statement has been produced using the approach set out in national planning guidance and will be made publicly available on the Council website to provide greater transparency once complete. The statement has also been prepared in accordance with best practice advice as set out in the Planning Advisory Service's 'Statement of Common Ground Advice and Template' (January 2019).

Relationship between this statement and the Duty to Cooperate

1.4. The SoCG provides a record of how Spelthorne BC has engaged with local authorities and prescribed bodies in order to agree specific strategic issues that have arisen through the course of preparing the Local Plan review. Full details of how Spelthorne BC has engaged with each of the prescribed bodies identified in Regulation 4 of The Town and Country Planning (Local Planning) (England) Regulations 2012 and section 33A(1)(c) of the PCPA 2004 are detailed in the [Duty to Cooperate Compliance Statement 2022](#), included as part of the evidence base to support the local plan review submitted to the Secretary of State. The Duty to Cooperate Compliance Statement has been updated with an [addendum](#) outlining activity since November 2022.

1.5. Full details of parties involved in this SoCG are listed in section 3 below.

2. Statement structure

2.1. As per national guidance and best practice advice provided by PAS, this statement includes:

- A list of parties involved in the SoCG.
- A list of signatories to the statement.
- The strategic geography covered by the SoCG (including map, description and justification).
- Strategic matters covered and a record of agreement for each, including:
 - A. Housing needs (including Gypsies, Travellers and Travelling Show People).
 - B. Employment needs.
 - C. Retail.
 - D. Green Belt and Environmental Matters (including matters relevant to Climate Change and flood risk).
 - E. Infrastructure (including transport, community and green infrastructure); and
 - F. Conservation and enhancement of the natural, built and historic environment
- Governance arrangements; and
- A record of on-going cooperation and a timetable for review

How this SoCG relates to other annex SoCGs

2.2. Whilst Spelthorne BC has attempted to detail cooperation in a single statement as per national guidance, it has been appropriate in some instances to prepare separate SoCGs with neighbouring boroughs and other parties as the most expedient way to evidence joint working on certain specific issues. Reference will be made to the arrangements detailed in these separate statements within this SoCG where appropriate. Full details of the annex SoCGs are provided in the Duty to Cooperate Compliance Statement Addendum, however a provisional list (correct at the time of writing) is provided here for easy reference:

- Spelthorne BC – Elmbridge BC Statement of Common Ground (See Appendix B Duty to Cooperate Compliance Statement Addendum January 2025)

2.3. Elmbridge BC have decided not to be a signatory to the joint Spelthorne SoCG and instead Spelthorne BC and Elmbridge BC have determined that it is appropriate to enter into a separate SoCG to consider strategic matters between the two authorities in more detail.

2.4. Earlier in the plan making process, Spelthorne BC entered into SoCG with a number Duty to Cooperate partners. These SoCGs will be superseded by this current SoCG which provides an updated position on strategic matters.

Statement of Common Ground

3. List of Parties involved:

Neighbouring and other authorities:

- London Borough of Hillingdon
- London Borough of Hounslow
- London Borough of Richmond upon Thames
- Runnymede Borough Council
- Royal Borough of Windsor and Maidenhead
- Slough Borough Council
- Surrey County Council


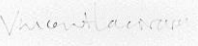



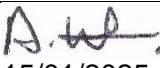
Prescribed Bodies and additional signatories:

- Historic England
- National Highways
- Natural England
- Environment Agency
- Transport for London

4. Signatories:

4.1 The following table sets out the signatories to this Statement of Common Ground. The column labelled 'Strategic matters...' is intended to allow Parties to indicate which matters each are acting as a signatory to in relation to the 'Record of Agreement' as set

out in section 6. A signature from a partner relates to agreement on strategic matters selected. See Table 4 for a record of on-going cooperation on strategic matters addressed in this Statement of Common Ground.

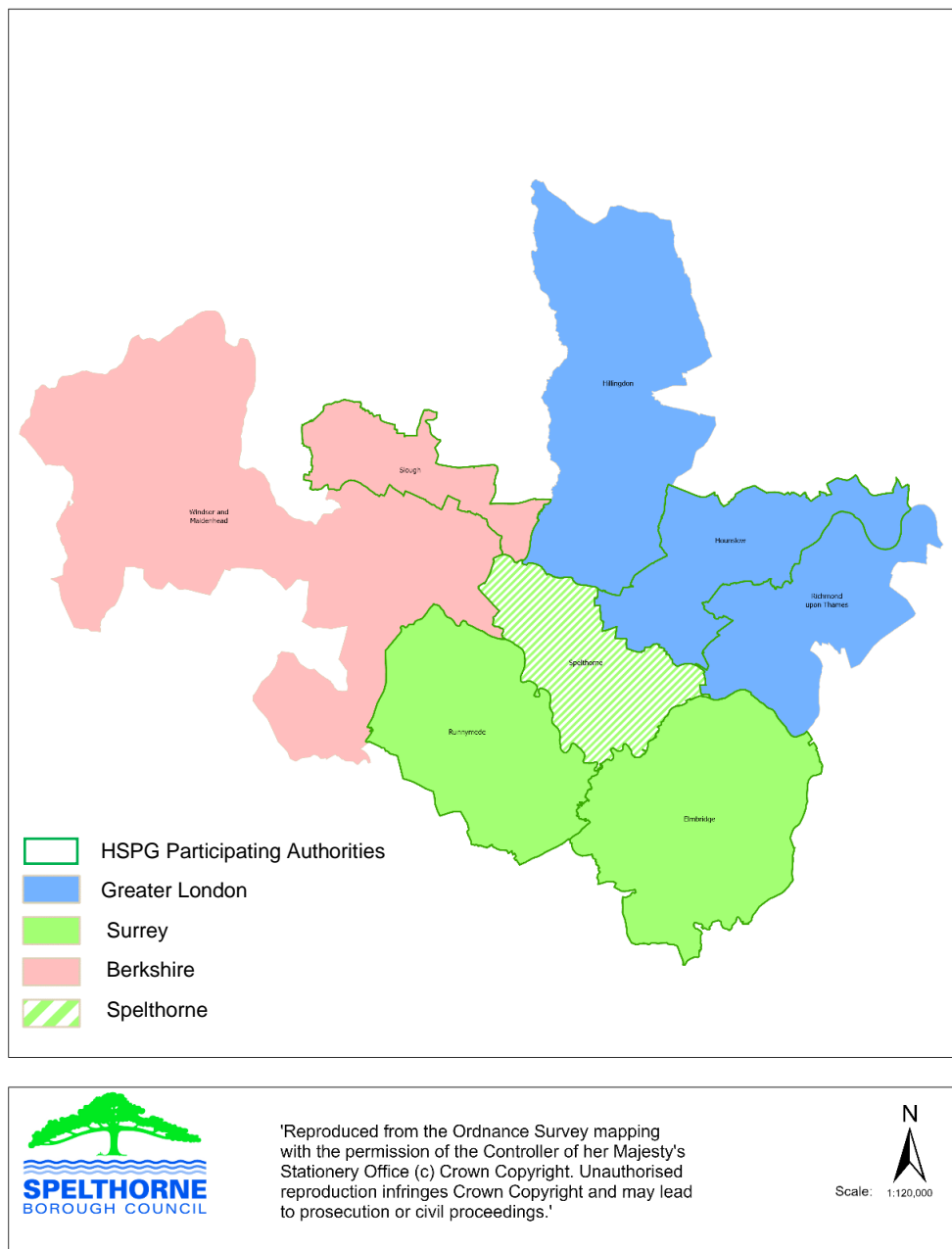
Organisation	Name	Position	Signature / date	Strategic Matters: Agreed positions to which this party is a signatory (section / paragraph no).
LB Hillingdon	Mathieu Rogers	Head of Strategic Planning and Regeneration	 24/01/2025	Housing / GTTS: A1-A9 Employment: B1-B3 Retail: C1-C2 Green Belt & Environment.: D1, D3-D5 Infrastructure: E2, E3, E6, E7, E8, E9
LB Hounslow	Vincent Lacovara	Director of Planning and Buildings	 17/01/25	Housing / GTTS: A1-A9 Employment: B1-B5 Retail: C1-C2 Green Belt & Env: D1-D5 Infrastructure: E3, E5, E6, E7, E9, E14 Conservation: F1-F2
LB Richmond upon Thames	Adam Hutchings	Spatial Planning and Design Team Manager	 17/01/2025	Housing / GTTS: A1-A9 Employment: B1-B5 Retail: C1-C2 Green Belt & Env: D1-D5 Infrastructure: E2, E3, E6, E7, E8, E9 Conservation: F1-F2
Slough BC	Pippa Hopkins	Planning Policy Manager	 15/01/2025	Employment: B1-B5 Retail: C1-C2 Green Belt & Env: D1-D5
Runnymede BC	Georgina Pacey	Planning Policy and Climate Change Manager	 17/01/2025	Housing / GTTS: A1-A9 Employment: B1-B5 Retail: C1-C2 Green Belt & Env: D1-D5 Infrastructure: E2, E3, E6, E7, E8, E9 Conservation: F1-F2
RB Windsor & Maidenhead	Adrien Waite	Assistant Director of Planning	 15/01/2025	Housing / GTTS: A1-A9 Employment: B1-B5 Retail: C1-C2

				Green Belt & Env: D1 – D6 Infrastructure: E1-E9 Conservation: F1-F2
Surrey County Council	Caroline Smith	Planning Group Manager	<i>Caroline J. Smith</i> 16/01/2025	Green Belt & Environment (flooding): D4-D6 Infrastructure: E1-E4, E6-E13 Conservation: F1-F2
Environment Agency	Separate SoCG signed October 2024			

Elmbridge BC and Spelthorne BC have developed a separate SoCG to address strategic matters identified between the two authorities given the similar Local Plan timetables. Other relevant bodies: National Highways, Historic England, Natural England and Transport for London have been contacted for any updates to SoCG produced in 2022 with none received.

5. Strategic Geography

Figure 1 Map of strategic geography covered by this Statement of Common Ground



Description and Justification

- 5.1 The map above (Figure 1) describes the strategic geography considered for cooperation on strategic matters as part of this Statement of Common Ground (SoCG). The area contains the administrative areas of Spelthorne BC and all neighbouring boroughs (Elmbridge BC, Runnymede BC, LB Hillingdon, LB Hounslow, LB Richmond, Slough BC, RB Windsor and Maidenhead), and the area covered by the Heathrow Strategic Planning Group (HSPG). There is a two-tier system of local government in Surrey, the county council and the 11 district and borough councils, including Spelthorne. Elmbridge is included in Figure 1 for wider context of the neighbouring authorities, but strategic matters will be included in a separate SoCG.

- 5.2 This area is appropriate given that it reflects existing borough boundaries, it includes the Spelthorne Functional Economic Market Area (FEMA), and linked boroughs identified by the Spelthorne Strategic Housing Market Assessment (SHMA).
- 5.3 Heathrow Airport is recognised as having a major economic influence upon Spelthorne and the surrounding area. Spelthorne BC is a member of the HSPG, and the administrative area covered by its members is also included here to reflect the on-going cooperation on spatial planning matters undertaken through this group.
- 5.4 Spelthorne BC is a member of the Surrey Planning Officers Association (SPOA) and Surrey Planning Working Group (PWG). The groups help to provide a forum/network for support and exchange of views and ideas in Surrey on strategic matters.
- 5.5 These linkages are considered to warrant the production of a Statement of Common Ground between Spelthorne BC, and the partners outlined above in order to demonstrate joint working on strategic matters being undertaken by these authorities and to record where agreements have or have not been reached.

6. Strategic Matters and Record of Agreement

Housing (including Gypsies, Travellers and Travelling Show People)

Housing Market and Need

- 6.1 The joint Spelthorne and Runnymede Strategic Housing Market Assessment (2015) confirms that Spelthorne and Runnymede sit within the same Housing Market Area. It is also acknowledged that in this part of the Southeast, HMAs tend to overlap due to the density of transport networks, both road and rail. This results in localised links across HMA boundaries. As such, there are localised cross boundary links between Spelthorne and Hounslow for housing matters despite these authorities sitting within neighbouring (albeit overlapping) HMAs.
- 6.2 The [National Planning Policy Framework December 2024](#) sets out under para 234 and 235 Annex 1 transitional arrangements for the purposes of plan making. In the case of SBC, the Local Plan has been submitted for examination under Regulation 22 on or before 12 March 2025 therefore para 234 applies and the local Plan will be examined under the relevant previous version of the Framework which is this instance is the [National Planning Policy Framework 2021](#). Therefore the Local Housing Need figure for Spelthorne is derived from the Government's Standard Method for calculating housing need. This sets a Local Housing Need figure of 618 dwellings per annum. The Spelthorne SHMA update (2019) identifies a net need of 459 affordable units per annum, however this is not a direct derivation from the 618 overall need and the council should seek as much affordable housing as is viable.

Housing Land Availability

- 6.3 Spelthorne has produced and updated annually its Strategic Land Availability Assessment to identify the level of land able to help meet Spelthorne's housing need.
- 6.4 The most up to date SLAA for Spelthorne dates from 2022. This identifies an average expected delivery of 595 units per annum over the 15-year plan period. This uses a base date of 31 March 2022 and focuses on the urban area only.
- 6.5 As part of the Draft Local Plan, Spelthorne BC has produced a housing trajectory which indicates that, through the release of a small amount of Green Belt, the borough has a pipeline of 9,402 new dwellings over the period 2024-2039. Over the plan period, there is a requirement to deliver 618 units per year, plus an additional 20% has been applied to the first five years of the plan to account for past under delivery meaning a cumulative requirement totalling 9,888. Therefore, Spelthorne is not able to meet its own needs over a 15 year period but can demonstrate a 5 and 10 year supply of housing and has committed to an early review policy within the Local Plan in alignment with NPPF Dec 2024 Annex 1 para 236

Gypsies, Travellers and Travelling Show People

- 6.6 The Council produced a Gypsy, Traveller and Travelling Show people Assessment (GTAA) in 2018. The assessment uses the Planning Policy for Traveller Sites definitions to provide an assessment of current and future need for Gypsy and Traveller accommodation in the borough. It identifies the following needs:

Additional need for Gypsy and Traveller households in Spelthorne (2017-2041)

Status	Total
Meet Planning Definition	3
Unknown	0-7 (10%=1)
Do not meet Planning Definition	17

Additional need for Travelling Show people households in Spelthorne (2017-2041)

Status	Total
Meet Planning Definition	15
Unknown	0-2
Do not meet Planning Definition	0

The Council does acknowledge since the Local Plan was submitted for examination in November 2022 the government announced changes to the Planning Policy for Traveller (PPTS) Sites in December 2023 which had previously been updated in August 2015. In the 2023 update, the government has reverted to the definition of Gypsies and Travellers used in the PPTS as adopted in 2012. This change is in response to a Court of Appeal judgment in the case of Smith v SSLUHC & Others (October 2022). As part of the early Local Plan review the Council will produce an updated GTAA which will reflect the most up to date national policy. The PPTS has been further updated alongside the NPPF Dec 2024, including a new definition of G&T and clarification that the tilted balance applies if there is no five-year supply.

6.7 Spelthorne plans to meet the needs of those who meet the planning definition within its Local Plan.

Record of agreement

A1. The Local Housing Need figure for Spelthorne is derived from the Government's standard method for calculating housing need. This equates to an annual requirement of 618 dwellings per annum, or 9,270 units over the 15-year plan period. In doing so, Spelthorne will meet the 5- and 10-year housing supply target and whilst it cannot currently demonstrate a 15 year supply of housing has committed to the inclusion of an early review policy within the Local Plan.

A2. Spelthorne has engaged with neighbouring boroughs to identify the distribution of identified housing needs, including the capacity of each authority to meet their own needs as well as any potential spare capacity to assist neighbouring authorities. The following positions on meeting housing need are summarised in the table below:

Name	Current housing target (dwellings per annum)	Capacity to meet own identified need	Capacity to meet unmet need
Spelthorne Borough Council	618*	Spelthorne BC plan to meet their housing need in full. Demonstrating a 5- and 10-year supply of housing with the commitment to an early review addressing longer term needs.	Spelthorne BC do not currently have any spare housing capacity to meet unmet need.
London Borough of Hounslow	1,782	LB Hounslow plan to meet their housing need in full.	LB Hounslow do not currently have any spare housing capacity to meet unmet need.
London Borough of Hillingdon	1083	Housing need is pooled and apportioned across London through the London Plan (2021). Hillingdon Council can demonstrate a five-year supply of deliverable	Any additional capacity above these targets will be needed to address the gap between capacity and need within the London Plan (2021).

			housing sites against this housing target. A Local Plan review is currently identifying the long-term capacity.	
	London Borough of Richmond upon Thames	411	Planned target of 411 homes per annum.	LB Richmond upon Thames do not currently have any spare housing capacity to meet unmet need.
	Elmbridge BC**	647*	Planned target of 452 dwellings per annum.	
	Runnymede BC	500 (as set out in adopted Runnymede 2030 Local Plan)	Runnymede BC's adopted Runnymede 2030 Local Plan (adopted July 2020) contains a strategy to meet the Borough's housing needs in full over the Plan period.	Runnymede BC does not currently have any spare housing capacity to meet unmet need, including any unmet needs arising from Spelthorne relating to Gypsies, Travellers and Travelling Show people.
	Slough BC	847*	Slough BC have currently paused work on the Local Plan therefore the position is currently unknown.	Slough BC are continuing with the evidence base, expect to still have unmet need for family housing but to reduce the 5k shortfall via additional sites.
	RB Windsor & Maidenhead	712	RBWM's Local Plan (adopted in Feb 2022) seeks to meet their housing need in full.	RBWM do not currently have any spare housing capacity to meet unmet need.
<p>Table 1: Housing Need</p> <p><i>*No up to date Local Plan housing target. The figure given represents housing need based upon MHCLG guidance for calculating housing need using the</i></p>				

standard method defined by government and is being used in the interim to project housing growth. This figure should not be confused with a plan target.

****** Elmbridge Borough Council are developing a separate SoCG to address strategic matters between the two authorities and are not a signatory to this document but are included for wider

A3. In line with paragraph 11 of the NPPF Dec 2024, plans should positively seek opportunities to meet the development needs of their area and provide for objectively assessed need for housing and other uses, as well as any needs that cannot be met with neighbouring areas, unless certain criteria apply.

A4. Spelthorne BC forms a Northwest Surrey Housing Market Area with Runnymede Borough however also shares functional links with Surrey and Greater London, particularly West London. It is agreed that there are localised cross boundary links between Spelthorne and neighbouring local authorities for housing matters.

A5. Spelthorne BC is unable to meet its housing needs in the urban area alone. In May 2020, Spelthorne BC contacted neighbouring authorities to ask if they were in a position to assist in meeting housing needs, to which no positive response was received. Subsequently, Spelthorne BC has adopted the spatial strategy of maximising brownfield locations and a small amount of Green Belt release.

A6. At present Spelthorne can deliver a 5- and 10-year supply of housing and has committed to an immediate review policy within the emerging Local Plan to address longer term housing and is not requesting assistance from neighbouring authorities to help meet needs. Spelthorne is also not in a position to accommodate any of the objectively assessed need for housing from neighbouring authorities.

A7. As housing supply evidence is completed by Spelthorne BC and the boroughs outlined in the table above, the findings will be shared and discussed with each other at key milestones.

Gypsies, Travellers and Travelling Show People

A8. Spelthorne BC has identified sites to meet the known needs of Gypsies, Travellers and Travelling Show people in accordance with national guidance relevant at the time of submitting the Local Plan for examination.

A9. The evidence base produced by Spelthorne BC and those of adjoining boroughs to assess the level of need for Gypsies, Travellers and Travelling Show people accommodation within the strategic area covered by this statement is robust. Each authority will endeavour to meet their identified accommodation needs for these groups within their individual borough boundaries through their respective Local Plans. The parties agree that they do not currently have capacity to meet any identified shortfall in Gypsy, Traveller & Travelling Show People provision from other boroughs.

Employment

Functional Economic Market Area

- 6.8 Spelthorne produced a Functional Economic Area (FEA) analysis to determine which Functional Economic Market Area (FEMA) it sits within. The FEA analysis identified that Spelthorne shares its strongest economic links with Runnymede, Elmbridge and the London Boroughs of Hillingdon & Hounslow and together these authorities sit within a Heathrow focussed Functional Economic Market Area.
- 6.9 Duty to Cooperate partners and the public were consulted on the FEA analysis in 2016 and comments were considered in the finalisation of the report.

Employment Land Needs Assessment

- 6.10 The Employment Land Needs Assessment (ELNA) study was produced in 2018 to assess the future demand and need for different types of employment land in the Borough over the plan period.
- 6.11 The ELNA was then updated in 2022. The COVID-19 pandemic has created uncertainty regarding employment land needs, with trends towards greater remote-working and the desire for more goods and services to be provided directly to homes. As such, the ELNA has been updated to take account of the changes in employment floorspace and associated job impacts. Overall, this has resulted in a need for 19,109sqm of employment floorspace, an overall increase of 10,495sqm since the 2018 ELNA. However, due to the instability in the market associated with the pandemic, there is uncertainty regarding the amount of employment floorspace required over the plan period. It is therefore considered appropriate to assess the position as part of the early review when it is hoped there will be more certainty.
- 6.12 Based on the methodology used in the 2018 ELNA, employment forecasts for Spelthorne borough, provided by Oxford Economics and Cambridge Econometrics, provide an estimate of the amount of floorspace which may be needed over plan period.
- 6.13 The table below shows that over the plan period Spelthorne anticipates that just over 18,000sq m of E(g)(i) and E(g)(ii) Office and Research & Development will be required, just under 12,000sq m of B8 Warehousing and Storage will be required however it is anticipated that just under 11,000sq m of B2 industrial floorspace will no longer be required. However, due to the locations and nature of the floorspace it is unlikely all of the former B2 floorspace could be used for E(g)(i) and E(g)(ii) and B8.

Use Class	Required change in floorspace 2022-2037 (sqm)
E(g)(i) and E(g)(ii)	18,372
B2	-11,268
B8 (general)	12,005
Total B Class	19,109

Table 2: Forecast change in floorspace 2022-37 Type of space required

- 6.14 There is a particular concentration of transport/storage businesses in the Borough many of which have business directly related to activities at Heathrow Airport. Shepperton / Pinewood Studios is part of a loose 'cluster' of like businesses in the outer/west London area. In 2019 Netflix took over the studios in order to produce more films in the UK. The Pinewood Group were successful in a planning application for an extension to Shepperton Studios which will see a £500m investment which will double the existing space available. In recent times there has also been growth within the construction sector. The former typology requires large B8 distribution sheds near the airport and with convenient access to the strategic road network.
- 6.15 As a result of these findings and the uncertainty associated with the pandemic recovery, the overall strategy in the Spelthorne Local Plan Review is to retain existing employment areas and to review the need for employment land in the early review period. In relation to the employment profile of the Spelthorne area, the policy approach is designed to support the retention, creation and development of local businesses, promote business competitiveness and allow for flexibility to cater for the changing needs of the economy.
- 6.16 The Local Plan seeks to direct proposals for new office and research & development (E (g) (i and ii)) floorspace sequentially to Staines-upon-Thames town centre and the Strategic Employment Areas. The Plan also seeks to guide proposals for new industrial, warehousing and storage (B2 and B8) floorspace to the industrial Strategic Employment Areas, to any of the existing industrial estates and to any sites where floor space of this use class is included in the site allocation in the Local Plan.

HSPG Joint Evidence Base and Infrastructure Study (JEBIS) and Joint Spatial Planning Framework (JSPF)

- 6.17 The HSPG have produced a Joint Evidence Base and Infrastructure Study (JEBIS) for member local authorities surrounding Heathrow (including Spelthorne BC, Runnymede BC, Slough BC, LB Hounslow, LB Ealing, Surrey County Council and Buckinghamshire Council). The study analysed the potential economic development and labour market arising from possible expansion of Heathrow Airport and explored how this relates to the background growth for which the authorities are already planning. This work has informed the preparation of the Joint Spatial Planning Framework (JSPF) which sets out a framework for the sustainable development of the sub-region, addressing the implications of both 'baseline growth' and the additional growth demand forecast to result from the expansion of Heathrow Airport over the next 30 years. The JSPF will sit alongside Spelthorne's Local Plan and will help inform any future proposals for the expansion of Heathrow Airport.

Record of agreement

B1. Spelthorne Borough Council has engaged with neighbouring boroughs, those within the 'best fit' FEMA and those other authorities identified within the wider region as having economic links with Spelthorne. The following positions on meeting employment needs are summarised in the table below:

Name	Capacity to meet own identified need	Capacity to meet unmet need
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		Runnymede BC	Runnymede BC are looking to meet all of their identified employment needs over its adopted Local Plan period. Further engagement on this issue should be undertaken through the HSPG.	Runnymede BC does not currently have any spare employment land capacity to meet unmet employment needs from other Local Authorities within its area. Further engagement on this issue should be undertaken through the HSPG.
		Elmbridge BC*	Elmbridge BC are looking to maintain and intensify existing employment land.	Employment needs will be considered in a separate SoCG between Spelthorne and Elmbridge.
		Slough BC	Slough are looking to meet as much as possible of its own employment need, however an up to date ENDA study is in the process of being commissioned.	The borough has tight land constrained boundaries with pressure to redevelop existing employment spaces for housing; and a lack of land to meet high demand for large scale logistics provision and Datacentres. There are also issues of low demand for new office space that is not bespoke or A Grade. As such SBC is unlikely to have the ability to meet shortfalls in Employment Land from elsewhere, but anticipates having a variously skilled labour supply that could meet any demand for jobs in the local travel to work area.
		London Borough of Hillingdon	Employment needs are pooled, and policies are compiled accordingly within the London Plan (2021). A Local Plan review is currently identifying what the localised need is and long-term capacity.	LB Hillingdon do not currently have any spare employment land capacity to meet unmet employment needs from Spelthorne.
		London Borough of Hounslow	LB Hounslow are planning to meet a significant proportion of their employment need as identified through the Hounslow Employment Land Review Update 2024.	LB Hounslow do not currently have any spare employment land capacity to meet unmet employment needs from Spelthorne. Further engagement on this issue should be undertaken through the HSPG.

	Further engagement on this issue should be undertaken through the HSPG	
London Borough of Richmond upon Thames	Unable to meet objectively assessed need for employment (based on latest Employment Land & Premises Needs Assessment 2021 and 2023 update).	LB Richmond upon Thames do not currently have any spare capacity to meet unmet need.
Royal Borough Windsor and Maidenhead	RBWM, in their adopted Local Plan, will be meeting all of their employment needs.	RBWM do not currently have any spare employment land capacity to meet unmet employment needs from Spelthorne within its area.

Table 3: Employment Floorspace Need

** Elmbridge BC are not a signatory to this SoCG but included for wider context as a neighbouring authority.*

B2. Spelthorne BC has not identified any employment land through its allocations due to the uncertainty associated with the pandemic however will support proposals that come forward in the urban area and designated employment areas. Spelthorne BC will review the need for employment floorspace in as part of the immediate review of the Local.

B3. At present Runnymede BC, Elmbridge BC, Slough BC, LB Hounslow, LB Hillingdon, LB Richmond upon Thames and RB Windsor and Maidenhead are not in a position to accommodate any of Spelthorne's objectively assessed need for employment floorspace. Spelthorne is not in a position to assist in meeting any unmet employment needs of neighbouring authorities.

B4. Spelthorne BC and the other HSPG members will continue to monitor the situation as regards the Heathrow expansion in light of the Appeal Court ruling in February 2020, subsequent overturned decision by the Supreme Court in December 2020 and the economic impacts of COVID-19.

B5. All parties agree with the conclusions drawn from analysis of the FEMAs to which they are a part and acknowledge the robustness of one another's evidence bases.

Retail

Retail and Town Centre Needs Study 2018

6.18 The main centres in the borough are Staines (a Major centre), Ashford, Shepperton and Sunbury (District Centres). Spelthorne also contains a number of Local Centres and Shopping Parades.

- 6.19 Spelthorne BC commissioned a Retail and Other Town Centre Uses Study (2015) to inform the approach taken toward retail provision and town centre development as part of the Local Plan review. The was then updated in 2018 to identify any changes in loss or gain of retail floorspace since the publication of the Study.
- 6.20 When compared with the findings of the 2015 Study there has been a material rise in the amount of quantitative need for convenience goods floorspace in the Borough and a material fall in the amount of quantitative need for new comparison goods floorspace over the medium to longer term. The Study Update indicates that across the Borough there is need for 22,192-23,680sqm comparison goods floorspace and 2837-5071sqm convenience goods floorspace up to 2035.
- 6.21 Staines was identified as a secondary regional retail centre and performs a strong comparison goods role in the wider sub-region with a catchment that extends into Runnymede, Elmbridge, Windsor & Maidenhead and the London Borough of Hounslow. However Staines-upon-Thames does experience some expenditure leakage to Kingston-upon-Thames. Furthermore, analysis of retail studies in the surrounding local authorities found links from Runnymede, Elmbridge, Hillingdon and Hounslow to parts of Spelthorne, namely Staines-upon-Thames.

Record of agreement

C1. Spelthorne BC is actively pursuing regeneration opportunities in its town centres through the Local Plan review in order to improve their offer and choice. Spelthorne is not looking to significantly alter the position of its centres in the wider retail hierarchy through the Local Plan reviews.

C2. All parties acknowledge the robustness of one another's retail evidence. There are currently no outstanding cross boundary retail issues and no parties are requesting one another to help meet any unmet retail needs at present.

Green Belt and Environmental Matters (including matters relevant to climate change adaption such as flood risk)

Evidence base keys findings

Green Belt

- 6.22 Spelthorne BC commissioned Arup to undertake a Stage 2 Green Belt Assessment in 2019. This builds upon work undertaken in the Stage 1 Green Belt Assessment (2018). The review has been prepared in accordance with the relevant National Planning Policy Framework at the time.
- 6.23 The stage 1 study has undertaken a comprehensive assessment of land within the Green Belt with respect to its performance against the purposes set out in paragraph 138 of the NPPF 2021 relevant at the time of assessment. The starting point for the Green Belt Assessment was to assess how far Local Areas of land in the borough meet the Green Belt purposes set out in the NPPF 2021. Where it has been found that parcels do not meet these purposes strongly, they have been considered further to assess the wider impacts of potential release from the Green Belt.

- 6.24 The Stage 2 Green Belt Assessment was then undertaken to build on the Stage 1 Green Belt Assessment at a finer grained level to assess the performance of smaller sub areas. The assessment considered the performance of sub-areas against the NPPF 2021 purposes and the role and importance of these in terms of the function of the wider Green Belt. Consideration was also given to potential impacts upon the relative strength of the Green Belt boundary and whether new boundaries would be defined 'clearly, using physical features that are readily recognisable and likely to be permanent'.
- 6.25 The Council has subsequently undertaken a Stage 3 Green Belt Assessment in house to consider specific individual parcels identified for potential release from the Green Belt. This assessment has utilised a similar methodology used for the Stage 1 and Stage 2 Green Belt Assessments for consistency.
- 6.26 The assessment and subsequent assessment work has concluded that exceptional circumstances have been demonstrated justifying a release of Green Belt for housing development, recognising the inability of the Borough to meet the local housing need figure derived from the standard method for calculating need without releasing this land. Consideration has been given to the range of potential options to meet this need, including greater density of development in the built-up area and the possibility of neighbouring authorities taking up any unmet need. This has not offered any alternative options for meeting the full housing need identified through the standard method.
- 6.27 The Council has identified two draft allocation sites close to the border of neighbouring authorities. ST4/025: Land at Coppermill Road, is adjacent to Windsor and Maidenhead. AS2/006: Land East of Desford Way is in close proximity to the LB Hounslow border. Spelthorne BC has contacted both authorities regarding any potential cross boundary issues.
- 6.28 The Spelthorne Green Belt Assessment Stage 1 finds that the band of Green Belt between Spelthorne and Hounslow is part of a narrow but essential arc of Green Belt preventing the sprawl of the Greater London built-up area and its coalescence with towns in Surrey. The Spelthorne Green Belt Assessment Stage 2, which comprises a finer grained assessment of smaller Green Belt parcels, similarly sets out that the band of Green Belt separating Spelthorne from Greater London performs an important strategic role in preventing urban sprawl.

Flooding

Strategic Flood Risk Assessment

- 6.29 Large areas of Spelthorne lie within the floodplains of the River Thames, Colne and Ash with only limited flood defence. Flooding and flood risk is a serious issue in Spelthorne. Strategic working with the Environment Agency and Surrey County Council as the Lead Local Flood Authority is required to assure the risks of flooding are appropriately assessed and addressed in the Local Plan through the location of development and the formulation of policies.
- 6.30 Consultants AECOM have produced a Strategic Flood Risk Assessment (SFRA) on behalf of Spelthorne BC This has been updated in February 2023, October 2023, March 2024, May 2024, June 2024 and August 2024. The purpose of this study is to identify the spatial variation in flood risk across the Borough of Spelthorne from all sources, facilitating a borough-wide comparison of future development sites with

respect to flood risk considerations. Spelthorne BC has worked with the Environment Agency, Surrey County Council and Thames Water at key stages in the production of the study and these bodies have been consulted on the draft project deliverables to ensure the scope of the study satisfies requirements. SBC signed a [SoCG with the Environment Agency](#) in October 2024 covering modelling, SFRA, production of a flooding Supplementary Planning Document, updates to allocations and updates to policy E3.

River Thames Scheme

- 6.31 The River Thames Scheme is a proposed programme of projects and investment to reduce flood risk in communities which will consist of a new flood channel in two sections, through the boroughs of Runnymede and Spelthorne in Surrey. In addition, there will be increases in capacity at three weirs and the Desborough Cut.
- 6.32 With the River Thames Scheme in operation, additional capacity is created by the new river channels and additional weir gates. The new flood channel will be built in two sections and is designed to create additional capacity for water from a major flood. Additional capacity will also be created at three weirs: Sunbury, Molesey and Teddington to accommodate high river flows in times of flood when the channels are fully operational. The scheme will also provide economic, social and environmental benefits.
- 6.33 Alongside the Environment Agency and Surrey County Council as joint applicants for the Development Consent scheme, the partnership behind the River Thames Scheme includes: Spelthorne Borough Council, Elmbridge Borough Council, Runnymede Borough Council, Royal Borough of Kingston upon Thames, London Borough of Richmond upon Thames, Thames Valley Berkshire Local Enterprise Partnership, Enterprise M3 Local Enterprise Partnership, Department for Environment Food and Rural Affairs (Defra), Thames Water and Thames Regional Flood and Coastal Committee (RFCC), with Natural England also engaging with the EA and Spelthorne.
- 6.34 The main groups are the Sponsor Group, consisting of representatives of the EA and Government, Elected Members and Chief Executives of the partnership bodies; the Project Board, consisting of the EA, government advisors and Directors of the partnership authorities; a Consents & Authorisations Advisory Group, consisting of planning and consent professionals from all partners; a Funding Group, consisting for finance professionals and elected Members of partners organisations. Spelthorne BC is represented on all main groups.

Climate Change

- 6.35 Climate Change is a global issue and therefore a cross boundary matter that extends across many strategic objectives/issues such as transport, infrastructure, housing provision, design, green infrastructure and so on.
- 6.36 Spelthorne BC declared a climate emergency in October 2020. The Council has committed to work with the local community and all other relevant partner agencies to support making the Borough carbon neutral as soon as practically possible. The Spelthorne BC Climate Change Supplementary Planning Document was published in April 2024 setting out six core themes, what can be implemented at a neighbourhood, street and building level and checklist requirements for planning applications.

- 6.37 The Local Plan seeks to ensure that all development is resilient to and capable of adapting to the future impacts of climate change through the inclusion of sustainable design features where this is technically feasible and viable and the enhancement of existing or creation of new green infrastructure features. Given that Cross-boundary impacts are likely to arise from new development taking place across the wider area it is important that partners work collaboratively to address the impact of Climate Change and make adaptation and mitigation an integral part of new development into the future.

Biodiversity

- 6.38 Biodiversity is a means of quantifying the natural environment, which surrounds us everywhere, and is connected to many aspects of everyday life. Biodiversity can be described as the richness and variety of living things which exist in a given area. Biodiversity and geodiversity (the diversity of geological sites) is not just confined to identified and protected sites but extends beyond local authority boundaries to create a network.
- 6.39 Biodiversity net-gain is an approach which aims to leave the natural environment in a measurably better state than beforehand. The Spelthorne Local Plan will seek to improve or enhance green assets over the course of the plan period.
- 6.40 Spelthorne aims to contribute to the nature recovery network across the County in order to enhance a joined up system of wildlife that extends beyond boundaries.
- 6.41 The Draft Local Plan is supported by the Habitats Regulation Assessment (HRA) which has been prepared on behalf of Spelthorne BC by consultants WSP. Spelthorne BC and Natural England have engaged with one another as the HRA has progressed to consider potential adverse impacts as a result of the Local Plan policies on the integrity of European nature conservation sites.

Record of agreement

D1. Metropolitan Green Belt is a strategic cross boundary matter for Spelthorne BC, Elmbridge BC, Runnymede BC, LB Hounslow, LB Hillingdon, LB Richmond upon Thames, Royal Borough of Windsor & Maidenhead and Slough BC given that each borough contains areas of designated Green Belt land which span their respective administrative boundaries.

D2. All parties have taken into consideration the importance of the Green Belt within their respective areas as part of the integrity of the wider Metropolitan Green Belt, with particular reference to Green Belt land that acts as the strategic arc preventing the continued outward sprawl of London and the merging of London with Surrey Towns.

D3. Where there are proposals to amend the Green Belt boundary between Spelthorne BC and any adjoining boroughs, opportunities will be sought to strengthen the remaining boundary and retain a strategic buffer between them, in particular where this exists between Greater London and Surrey. In addition, the Secretary of State in decisions has recognised the importance of the

strategic gap between Heathrow, Stanwell Moor and Slough over and above Green Belt protection.

D4. Spelthorne BC will continue to engage with neighbouring authorities and relevant partners to address and mitigate flood risk from the River Thames and other sources.

D5. The adaptation and mitigation of Climate Change is a running theme through all strategic issues (e.g., transport infrastructure, housing, green infrastructure), therefore Spelthorne will continue to work with partners to reduce the impacts of Climate Change to reach zero carbon throughout the plan period.

D6. Spelthorne will work with partners to help develop a joined up nature recovery network that spans across the county and beyond. Spelthorne and partners will share the most up to date information where available to assist in developing and delivering the Surrey Local Nature Recovery Strategy and enhancing green assets throughout the plan period.

Infrastructure (including transport, community and green infrastructure)

Transport Impact Studies

- 6.42 A highways impact assessment has been undertaken by Surrey County Council on behalf of Spelthorne BC to model the potential impacts on the highway network of the Draft Spelthorne Local Plan. This considered the current state of the transport network, the future impact of expected population growth and development and the effects of the introduction of transport improvements ('mitigations').

Spelthorne Local Plan: Strategic Highway Assessment Report (2022)

- 6.43 This study assessed the transport impacts of site allocations and wider transport impacts associated with planned growth derived from the Local Plan.
- 6.44 Surrey's transport model SINTRAM has been used for the assessment as well as a cordoned Local Model of Spelthorne and its immediate surroundings. A future year of 2037 has been assessed, to tie in with the end of the Local Plan period. Model scenarios are as follows:
- 2037 Do Minimum – this includes growth outside the borough, plus growth from planned and committed developments since 2014 within the district.
 - 2037 Do Something – as above plus Local Plan development sites and windfalls.
- 6.45 The assessment has included the following large scale developments located outside but close to the Spelthorne boundary, where these have already gained planning permission or are included in Local Plans:
- Longcross Garden Village (Southern Site),
 - Longcross Garden Village (Northern Site),
 - South Bedfont,
 - Bedfont Gardens,
 - Airport Business Park, and
 - MOD Feltham.

6.46 Key findings:

1. Overall, the developments are reasonably small and dispersed. As a result, the impacts tend to be local to the developments and the cumulative impact is in general tolerable. Nevertheless, there are some cumulative impacts in Staines, Stanwell, Ashford and Sunbury. It is not considered that any impacts would be considered severe in terms of the National Planning Policy Framework 2021 (NPPF).
2. There is a need for localised highway mitigation tied in with specific developments, as well as schemes to address cumulative impacts in some locations. Some further work will be required to help inform Spelthorne's Infrastructure Development Plan. With measures consistent with Surrey County Council's recently adopted Local Transport Plan 4. In particular there is a need for high quality pedestrian and cycle routes and corridors linking the developments with where people want to travel to in order to limit travel by private vehicle.

6.47 The Strategic Highways Assessment has identified that no individual site is forecast to have a significant impact on the Staines locality.

Southern Access to Heathrow

6.48 To date, the government is advancing two new major rail schemes (Western Rail to Heathrow and Southern Rail to Heathrow) to significantly transform rail access to and from Heathrow. The government plans to partly involve the private sector in its financing, delivery and maintenance. It aims to improve access to Heathrow from the south, reduce rail journey times, ease road and passenger congestion, create additional connections, generate economic growth and new jobs and provide an alternative form of transport for passengers, especially people who travel to the airport by car.

6.49 Spelthorne Borough Council has submitted a £375m alternative light rail scheme to Heathrow to the Department of Transport (DfT) as part of its call for ideas on third party funded projects. The proposed light rail transport link will connect Staines-upon-Thames to Heathrow to provide joined up journeys into the airport from the south. There are several other possible alignments, and all are to be assessed by DfT.

6.50 The next step is for Government to set out a clear pathway for the progression of the scheme. Spelthorne BC will continue to engage with central government and other stakeholders to help the delivery of a southern rail access to Heathrow.

Spelthorne Local Cycling and Walking Infrastructure Plan (LCWIP)

6.51 An LCWIP is a key transport planning document that has been defined by the Department for Transport (DfT), which aims to support recent uptakes in the active travel modes of walking and cycling by delivering improved facilities for existing active users whilst also encouraging a mode shift for new users.

6.52 The Spelthorne LCWIP has considered the full extent of the Borough of Spelthorne, with an emphasis on links between key trip attractors and destinations that will encourage a greater mode share for the active travel modes of walking and cycling.

- 6.53 Spelthorne has worked with Surrey County Council to develop the Plan. It is important that LCWIPs are integrated and connected across the wider area so that walking and cycling projects are joined up across local authority boundaries.
- 6.54 Spelthorne and Surrey CC will continue to engage with neighbouring authorities as other LCWIPs are developed in future and to ensure a continuous synergy amongst LCWIPs more broadly. This approach is also reinforced in the Local Plan SoCG between Surrey CC and Hounslow (with an update currently being pursued by both parties to take account of the latest position with regards the emerging Hounslow Local Plan 2020-2041) which agrees to collaborative working at the borough boundary to ensure alignment of active and sustainable travel improvements, for example in the Ashford and Sunbury areas. Improved sustainable access to Heathrow will also be a priority.

Spelthorne Borough Council (SBC) & London Borough of Hounslow (LBH) – Highways Matters

The matters covered within this table (paragraphs 6.54.1 – 6.54.10) and agreement E14 are applicable to Hounslow and Spelthorne only.

- 6.54.1 SBC have engaged with LBH throughout the course of the preparation of the Local Plan and have consulted LBH at each key stage of the planning process. Strategic level modelling has been undertaken and does not identify unreasonable impacts on the road network. That said, both parties need to ensure that work is done at the appropriate time to ensure that any cumulative impact is fully assessed, and any required mitigation is delivered in order to promote safe and efficient operation of the highways network.
- 6.54.2 With regards to detailed modelling of the A30 / B378 junction, both parties agree that such modelling is best further conducted at application stage and emerging policy ID2 addresses this through the requirement for developers to provide detailed transport assessments and travel plans.
- 6.54.3 In order to facilitate effective cross-boundary working on the delivery of highways mitigation measures, LBH propose that a similar form of wording to that agreed between LBH and SCC in a SoCG dated May 2021 should be added to the supporting text to SBC's emerging Policy ID2 by way of additional modifications:

Proposals for new development must include any necessary mitigation measures required as a result of development to be funded and/or delivered by the developer to ensure the continued safe and efficient operation of the strategic and local road networks. In this regard, SBC and SCC (as the highways authority) will continue joint working with adjoining authorities including LBH [etc] to establish the impacts of proposals on the local road network both within and outside the borough, and how these might be mitigated and funded, in order to encourage cross-boundary active and sustainable travel.'

- 6.54.4 SBC has identified allocation site AS2/006: Land East of Desford Way for 15 travelling show people plots, in close proximity to the border of LBH. SBC consulted LBH at the Regulation 19 stage of the Local Plan however no response was received.

<p>6.54.5 A Transport Appraisal has been produced by SBC to assess the potential transport impacts of development along the A30, and where necessary, may identify mitigation measures in order to promote sustainable development. This study found that the level of vehicle trip generation can be accommodated by a left-in/left-out priority junction arrangement and is not expected to have a detrimental impact on the A30. This would be confirmed in a full Transport Assessment report to support a future planning application, in consultation with SBC and National Highways.</p> <p>6.54.6 LBH note emerging site SN1/006 'Land to west of Long Lane and south of Blackburn Trading Estate' is allocated for 200 dwellings. Given its size and location, LBH would require that further testing be undertaken in the event of any proposed increase to the number of homes allocated on this through modifications as part of the examination process.</p> <p>6.54.7 Both parties will continue to:</p> <ul style="list-style-type: none"> • Work together on proposed active travel routes and improvements with Surrey CC as the responsible Highways Authority. • Cooperate to increase connectivity at the borough boundary in order to ensure that more active and sustainable transport movements can take place • Continue to engage with SCC on strategic matters relating to the safe and efficient functioning of the wider highways network, particularly with regards to the potential impact of planned growth across both authority areas. 	
<p><u>Waste and Minerals</u></p> <p>6.55 Surrey County Council is responsible for plan-making and decision-taking in respect of minerals and waste management development in Spelthorne. Surrey County Council and Spelthorne BC agree to safeguard minerals and waste management development pursuant to paragraph 223 of the National Planning Policy Framework Dec 2024; Policy MC6 of the Surrey Minerals Plan Core Strategy 2011; Policy 7 of the Surrey Waste Local Plan 2020; and the Minerals and Waste Consultation Protocol 2022.</p> <p><u>Education</u></p> <p>6.56 The Infrastructure Delivery Plan (IDP) identifies infrastructure requirements across the borough, setting out what is needed, where, and when. It includes projects relevant to waste, transport, education, utilities, health, culture, sports, the emergency services, and green infrastructure. Surrey County Council as the education authority to have provided evidence which sets out the estimates of additional pupils in Spelthorne over the Plan period, including those yielded as a result of planned new housing in the Borough. These estimates are based on the most up-to-date birth rates, pupil migration trends and planned housing shared by the Borough Council.</p> <p>6.57 The purpose is to forecast the need for additional school provision required to support planned housing development in the Borough. Based on current forecasts there are sufficient primary places across the Borough. Based on current forecasts there is a need for additional secondary school places in Spelthorne. Discussions with the County Council have highlighted the likely need for additional Special</p>	

Educational Needs and Disability (SEND) provision in the Borough over the Plan period.

- 6.58 Through the Local Plan, the provision of a new sixth form college has been proposed (Allocation HS1/012b). Spelthorne will work with Surrey County Council to ensure the supply of specific types of provision to meet needs.

Health and Social Care

- 6.59 Surrey County Council manage adult social care in Surrey. This includes people who are frail, have disabilities or neurodiversity or mental health issues. The aim is to help people stay independent, safe and well, which creates specific accommodation requirements.
- 6.60 There are many accommodation options for older people, which endeavour to respond to varying levels of care and support needs. This includes adapted mainstream housing, sheltered housing, extra care/assisted living or residential and nursing care. Provision therefore involves the private sector alongside the public sector.
- 6.61 Spelthorne BC acknowledges the need for extra care housing across the County, as prioritised by Surrey County Council.

Record of agreement

E1. Surrey County Council and National Highways have been consulted on policy preparation and strategic policies in the Local Plan (Site Allocations and Policy ID2: Sustainable Transport for New Developments) and have been prepared in line with the findings of the Spelthorne Strategic Highways Assessment.

E2. Spelthorne will work with relevant stakeholders as work on the Southern Access to Heathrow progresses. Spelthorne will work with TfL, HSPG, neighbouring authorities and central government to identify the necessary interventions that would enable the scheme to be delivered and operate effectively, in order to ensure that it is well integrated with the wider network and does not result in unacceptable impacts to either stations or rail services.

E3. All parties agree to keep each other updated as infrastructure evidence is produced and as discussions with infrastructure and service providers continue if any relevant cross boundary matters arise, or if further infrastructure projects are found to be necessary.

E4. HSPG member authorities will continue to work collaboratively through the Heathrow Strategic Planning Group in relation to matters associated with strategic cross boundary transport schemes.

E5. LB Hounslow and Spelthorne BC acknowledge each other's proposals for a Southern Rail Link to Heathrow. The parties involved in this agreement are not the decision makers and will await the outcomes of these plans to inform future discussions but will work together to ensure a positive outcome that meets wider strategic objectives.

E6. The Spelthorne Strategic Highways Assessment indicates that the unmitigated growth proposed through the Local Plan would result in an impact to two cross-boundary A and B roads (A30 and B376) however flow is expected to remain stable. Overall cross boundary impacts on neighbouring authority areas are expected to be minor with localised highway mitigation tied to specific developments expected to address impacts.

E7. Spelthorne BC has robustly assessed the impacts of growth on the highway network and will engage with partners as it develops additional evidence to support the Local Plan. This includes any future transport assessments to accompany the emerging Staines Development Framework Supplementary Planning Document.

E8. At present no specific cross boundary infrastructure issues between the parties to this agreement have been identified beyond those identified above.

E9. Spelthorne will continue to engage with neighbouring authorities where cross boundary issues are identified. Spelthorne will work with Surrey County Council and adjoining authorities to ensure that proposed active travel routes and improvements can be aligned with SCC's forthcoming programme of active travel improvements in Spelthorne. Parties agree that cooperation is required to increase connectivity at the borough boundary in order to ensure that more active and sustainable transport movements can take place, and to address cross-boundary highways issues.

E10. Spelthorne will continue to work with Surrey County Council as the education authority to ensure that the most up to date information is taken into account in identifying needs and in ensuring sufficient places are available to meet needs.

E11. Spelthorne BC will actively work with Surrey County Council to ensure that appropriate mitigation is in place to protect the amenity of residents whilst also protecting minerals and waste operations and safeguarding, should any potential impacts arise through Local Plan development. Spelthorne and Surrey County Council will maintain an ongoing dialogue in order to take account of the most up to date information regarding Minerals and Waste planning over the course of the Local Plan.

E12. It is agreed that Spelthorne BC and Surrey County Council will continue to work together on housing needs and Spelthorne BC will inform Surrey County Council of any updated housing evidence over the course of the plan period, particularly on the needs of specific groups of the population. Spelthorne will consult the Adult Social Care team within Surrey County Council on development proposals relating to the provision of C2 housing.

E13. Spelthorne BC and Surrey County Council will work together to identify funding sources for infrastructure improvements, including developer contributions.

Agreement only between Spelthorne BC and LB Hounslow

E14. Spelthorne BC will incorporate the proposed modification to policy ID2 by LB Hounslow, as set out in paragraph 6.54.3 above. Both parties will continue to engage on strategic matters relating to the highways and commit to joint working, particularly to enable cross boundary sustainable active travel improvements.

Elmbridge BC	Separate SoCG agreed	Separate SoCG agreed	Annex SoCG	Meeting 23/10/24 and 03/12/24 agree to update separate SoCG.
LB Richmond upon Thames	V2 Jan 2025 sent 10/01/25 for signing	Comments received on V1, V2 amended accordingly	None	Meeting 05/11/24, agree to review and update SoCG. V1 SoCG sent 17/12/24 for comments.
LB Hounslow	V2 Jan 2025 sent 10/01/25 for signing	Comments received on V1, V2 amended accordingly	None	Meeting 11/10/24 and 18/12/24, agree to review and update SoCG including agreement relating to highway matters between two authorities.
LB Hillingdon	V2 Jan 2025 sent 10/01/25 for signing	Comments received on V1, V2 amended accordingly	None	Meeting 05/11/24, agree to review and update SoCG. V1 SoCG sent 17/12/24 for comments.
Slough BC	V2 Jan 2025 sent 10/01/25 for signing	Comments received on V1, V2 amended accordingly	None	Meeting 21/10/24, agree to review and update SoCG. V1 SoCG sent 17/12/24 for comments.
RB Windsor and Maidenhead	V2 Jan 2025 sent 10/01/25 for signing	Comments received on V1, V2 amended accordingly	None	Meeting 21/10/24, agree to review and update SoCG. V1 SoCG sent 17/12/24 for comments
Surrey CC	V2 Jan 2025 sent 10/01/25 for signing	No further comments	None	Meeting 22/10/24, agree to review and update SoCG. V1 SoCG sent 17/12/24 for comments
Historic England	Agreed submission SoCG	Contacted for any updates or comments	None received	Emailed Nov 2024 updating on Local Plan progress and request for any comments or updates.
Environment Agency	Agreed separate SoCG Oct 2024	Separate SoCG agreed	Annex SoCG	Separate SoCG agreed
Natural England	Agreed submission SoCG	Contacted for any updates or comments	None received	Emailed Nov 2024 updating on Local Plan progress and request for any comments or updates.
National Highways	Submission SoCG sent Oct 2022	Contacted for any updates or comments	None received	Emailed Nov 2024 updating on Local Plan progress and request for any comments or updates.
Transport for London	Agreed submission SoCG	Contacted for any updates or comments	Response received 21/11/24 with no further comments	Emailed Nov 2024 updating on Local Plan progress and request for any comments and updates.

Table 4: Record of on-going cooperation

8.2 The following table provides information on the plan review, update and submission timetables for the local authorities which are signatories to this statement

Authority	Present plan adoption date	Proposed review date	Target Reg.18 date	Target Reg.19 date	Target submission date	Proposed adoption date
Spelthorne BC	2009	2014	November 2019 – January 2020	June – Sept 2022	Plan submitted Nov 2022	Sept 2025
Runnymede BC	July 2020	September 2025	July to August 2026	September 2027	January 2028	August 2028
Elmbridge BC	Separate SoCG under production					
LB Richmond upon Thames	July 2018 (March 2020 on two issues in relation to legal challenges)	Underway	December 2021 – January 2022	June-July 2023	19 January 2024	2025
LB Hounslow	2015	2016	October-November 2023	September-October 2024	Winter/spring 2025	Winter 2026
LB Hillingdon	2020	Underway	April-June 2024	March 2025 to April 2025	May to June 2025	July 2026
Slough BC	2010	New Local Development Scheme under production ²				
RB Windsor and Maidenhead	February 2022	None	None	None	None	None
Surrey CC	Waste Local Plan 2019		Joint Minerals and Waste Plan June 2025	Early 2026	Mid 2026	Late 2027
Historic England	N/A	N/A	N/A	N/A	N/A	N/A

² Revised dates were submitted to PINS – due to funding currently unclear if submission will be achieved under the current Regs.

Environment Agency	N/A	N/A	N/A	N/A	N/A	N/A
Natural England	N/A	N/A	N/A	N/A	N/A	N/A
National Highways	N/A	N/A	N/A	N/A	N/A	N/A
Transport for London	N/A	N/A	N/A	N/A	N/A	N/A

8.3 The SoCG will be reviewed annually to take account of plan preparation updates and/or local developments. As set out in the Governance Arrangements section above, it will be the responsibility of the party in question to co-ordinate the review and updating of this SoCG where they are undertaking a Regulation 18 consultation, Regulation 19 publication or submitting a Local Plan to the Secretary of State.

Appendix B Statement of Common Ground

Spelthorne Borough Council and Elmbridge Borough Council

1. List of Parties Involved

- Spelthorne Borough Council (SBC)
- Elmbridge Borough Council (EBC)

2. Signatories



24 January 2025

Councillor Malcolm Beecher, Environment and Sustainability Committee Chair

Spelthorne Borough Council



24 January 2025

Suzanne Parkes, Head of Planning & Environmental Services

Elmbridge Borough Council

3. Strategic Geography

The Statement of Common Ground (SoCG) is between the local authorities of Spelthorne Borough Council (SBC) and Elmbridge Borough Council (EBC).

SBC and EBC share a common boundary within the Surrey County Council administrative area. The River Thames separates the two authorities with the A244 Walton Bridge providing the primary link point.

Figure 1 identifies the strategic geography considered for cooperation on strategic matters as part of the preparation of our respective Local Plans.



Figure 1: Strategic Geography of Spelthorne and Elmbridge Boroughs

4. Strategic Matters

SBC and EBC have engaged with one another to discuss duty to cooperate matters throughout the preparation of their respective draft Local Plans. This has included engagement on their evidence base documents; through meetings; and at the Regulation 18 & 19 Stages.

Their duty to cooperate activities up until their respective Regulation 19 Stages, are recorded in the following documents:

- SBC's Duty to Cooperate: Statement of Compliance, Regulation 19 Local Plan (May 2022)
- EBC's Duty to Cooperate: Statement of Compliance (June 2022)

Both authorities agree that the above documents are an accurate record of their engagement up until their respective Regulation 19 Stages.

SBC has updated its Duty to Cooperate: Statement of Compliance (November 2022) with an [Addendum](#) following the Regulation 19 stage to take account of cooperation since the end of the consultation period. In addition, SBC prepared Topic Paper 4: Duty to Cooperate with Elmbridge Borough Council (January 2023) setting out the position between the two authorities at that time. EBC notes the Topic Paper which includes SBC's narrative of activities between the two authorities from their perspective.

SBC invited representations on their draft Local Plan (Regulation 19) between 15 June and 21 September 2022. EBC's response is dated 15 September 2022. EBC invited representations on their draft Local Plan (Regulation 19) between 17 June and 29 July 2022. SBC's response is dated 28 July 2022.

Both authorities through their representations identified Housing and the Green Belt as outstanding strategic matters.

Current positions:

Spelthorne Borough Council:

On Friday 25 November, Spelthorne Council submitted its draft Local Plan to the Secretary of State for Levelling Up, Homes and Communities for independent inspection.

SBC had undertaken additional work since submission to explore the impacts of adding the Green Belt sites discounted between Preferred Options and Regulation 19 (known here as the 'omission sites') to increase housing provision above the Local Housing Need figure of 618 homes per annum.

The conclusions drawn from the work by Spelthorne are that further release of Green Belt would result in adverse impacts that would significantly and demonstrably outweigh the benefits. As such, SBC do not consider there are sound grounds for assisting Elmbridge or any other neighbour in meeting their unmet need.

Elmbridge Borough Council notes the additional work undertaken by SBC on testing a higher growth scenario in response to the Regulation 19 representations received including, that from EBC. The outcomes of the additional work as set out in SBC's Topic Paper 4 are acknowledged by EBC.

Spelthorne BC examination hearings began on the 23 May 2023 with two subsequent days of hearings held on 24 May and 25 May respectively. Main Matter 1: Legal Requirements and Overarching Issues were discussed at the hearings in May 2023. The Inspector did not raise any concerns regarding the Duty to Cooperate at that point in time.

An Extraordinary Council Meeting was held on 6 June 2023, at the meeting Council resolved to "formally request the Planning Inspector to pause the Examination Hearings into the Local Plan for a period of three (3) months to allow time for the new council to understand and review the policies and implications of the Local Plan and, after the three month pause, the Council will decide what actions may be necessary before the Local Plan examination may proceed".

During the initial three months of the pause, officers delivered a training programme to councillors to make them aware of what the plan is proposing and where the process has got to. In addition to this training programme, Catriona Riddell & Associates Ltd. was appointed to conduct a critical friend review of the Local Plan. The review was presented in a report that was finalised on 25 August 2023.

An extraordinary meeting of Council was held on 14 September 2023, where it resolved to extend the pause in the examination timetable.

The Environment & Sustainability Committee of SBC met on 29 February 2024; in this meeting it was resolved that a set of modifications to the plan would be proposed to the Inspector. On 8

July 2024, the Corporate Policy & Resources Committee at SBC resolved to make further recommendations to Council. Council on 18 July 2024 resolved that, in addition to what was resolved in the Corporate Policy & Resources Committee on 29 February 2024, to request a modification to add wording to the policies of the site allocations that are at risk from access and egress flooding issues.

In a meeting on 24 October 2024 the Council resolved to

- Note that the Environmental Agency had signed a Statement of Common Ground
- Agree to keep the Green Belt allocations in the Local Plan as submitted to the Planning Inspectorate on 25 November 2022

Following the meeting of Council on the 24 October the Chair of the Environment and Sustainability Committee wrote a letter to the Planning Inspector to inform him of the outcome of the meeting and to request the resumption of the Local Plan Examination. On 12 December the Council published the Notice of Examination Hearings, and a series of documents on the Examination Website, providing up-to-date information for stakeholders, to support the upcoming hearings, which are due to start on the 28th January 2025.

The full details on the pause, developments following the pause, correspondence with the Environment Agency and proposed modifications can be found in [Topic Paper 8 - Spelthorne Local Plan: Progress Since the 2023 Examination Pause](#)

Elmbridge Borough Council:

The draft Elmbridge Local Plan was submitted to the Secretary of State for Levelling Up, Homes and Communities for independent examination on 10 August 2023.

Following submission two stages of Examination in Public took place. Stage 1 of the Examination in Person (EiP) took place on Tuesday 27 February 2024 considered legal and procedural matters, including the Duty to Cooperate. Following this hearing session the inspector wrote to the Council on 5 March 2024 confirming that she was satisfied that the Duty to Cooperate had been met and that the examination would progress forward to Stage 2.

Stage 2 of the Ei commenced on Thursday 25 April and concluded on Friday 28 June 2024. There was a pause between hearings sessions from 2 May to 16 June 2024 for the council to undertake additional work on the housing trajectory and five-year housing land supply. The stage 2 hearing sessions examined the following matters:

- The approach to housing need
- Strategic Policies, Spatial Strategy and the distribution of development (Policies SS1, SS2 and SS3) including the scale and location of good growth
- The Housing requirement
- Housing delivery and meeting housing needs (inc Windfall, policy HOU1, five-year supply and the approach to the Green Belt)
- Affordable Housing (overall approach including policy HOU4)
- Other Housing Matters (policies HOU2, HOU3, HOU6, HOU7, HOU8)
- Meeting Employment Needs (policies ECO1, ECO2)
- Site Allocations

EBC received the Inspector's Initial Findings letter on 11 September 2024. The letter stated that the plan as submitted is unsound, but that the Plan may be capable of being made sound

through main modifications outlined in the additional work she set out. The Inspector set out in relation to housing supply that she considered that an element of Green Belt release, to meet need, would be a justified and effective approach in this instance. The Inspector requested that the council advise whether this additional work could be completed within 6 months, as set out in the recent ministerial statement.

EBC responded to the inspector setting out that the Council considered that the additional work would take 12-15 months to complete, with a detailed work programme for its completion. However, the Inspector on wrote back to the Council on 18 October 2024 not agreeing to the additional time, as it was well beyond the 6-month overall time period set out in the Ministers letter of the 30 July 2024, and that it would be inappropriate to apply the 'Inspectors discretion' in this case. The Inspector set out that the Plan should now either be withdrawn or the Inspector will write her report that will find the Plan unsound.

A report will be going to Cabinet and then Council in February 2024 to make a formal decision following the receipt of the Inspector's letter.

SBC notes the decision-making process that has led to the adoption of the Elmbridge Local Plan strategy. Spelthorne acknowledges the Elmbridge Local Plan has proceeded to Examination in Public and received the Inspectors Interim Findings Letter on the 1st October 2024 and Inspectors Final Response Letter 23rd October 2024. SBC will continue to engage with EBC on strategic matters where further cooperation is required

The position of each authority in regard to the identified strategic matters, as set out in their respective draft Local Plans, is as follow:

Housing

Housing Market and Need

Spelthorne

The joint Spelthorne and Runnymede Strategic Housing Market Assessment (2015) confirms that Spelthorne and Runnymede sit within the same Housing Market Area (HMA). It is also acknowledged that in this part of the South-East, HMAs tend to overlap due to the density of transport networks, both road and rail. This results in localised links across HMA boundaries. As such, there are localised cross boundary links between Spelthorne and Hounslow for housing matters despite these authorities sitting within neighbouring (albeit overlapping) HMAs.

The National Planning Policy Framework December 2024 sets out under para 234 and 235 Annex 1 transitional arrangements for the purposes of plan making. In the case of SBC, the Local Plan has been submitted for examination under Regulation 22 on or before 12 March 2025 therefore para 234 applies and the local Plan will be examined under the relevant previous version of the Framework which in this instance is the National Planning Policy Framework 2021. Therefore, the Local Housing Need figure for Spelthorne is derived from the Government's Standard Method for calculating housing need as required by NPPF 2021. This sets a Local Housing Need figure of 618 dwellings per annum. The Spelthorne SHMA update (2019) identifies a net need of 459 affordable units per annum, however this is not a direct derivation from the 618 overall need and the council should seek as much affordable housing as is viable.

Elmbridge

The Kingston & North-East Surrey Strategic Housing Market Assessment (SHMA) (2016) identifies that Elmbridge Borough sits in the same HMA as the Royal Borough of Kingston upon Thames, Epsom & Ewell Borough Council and Mole Valley District Council. It also acknowledged that in this part of the South-East, HMAs tend to overlap. This results in localised links across HMA boundaries. As such, there are localised cross boundary links between Elmbridge and the Runnymede / Spelthorne HMA and the West Surrey HMA (Guildford, Waverley & Woking Borough Councils).

The Local Housing Need figure for Elmbridge is derived from the Government's Standard Method for calculating housing need. This sets a Local Housing Need figure of 647 dwellings per annum. The Elmbridge Housing Needs Assessment (2020) identifies the net level of affordable housing need as 269 units per annum.

Housing Land Availability

Spelthorne

As part of the Draft Local Plan, Spelthorne BC has produced a housing trajectory which indicates that, through the release of a small amount of Green Belt, the borough has a pipeline of 9,402 new dwellings over the period 2024-2039. Over the plan period, there is a requirement to deliver 618 units per year, plus an additional 20% has been applied to the first five years of the plan to account for past under delivery meaning a cumulative requirement totalling 9,888. Therefore, Spelthorne is not able to meet its own needs over a 15 year period but can demonstrate a 5 and 10 year supply of housing and has committed to an early review policy within the Local Plan in alignment with NPPF Dec 2024 Annex 1 para 236.

Elmbridge

As part of the draft Local Plan, EBC produced a Land Availability Assessment (LAA) (2022) which indicates the capacity of the borough (urban areas only) over the next 15-years as 6,787 dwellings. The capacity represents a 30% shortfall on the Local Housing Need figure for Elmbridge.

The draft Local Plan sets out the Council housing requirement of providing 452 net units per annum over the 15-year plan period. As set out in the draft Local Plan, EBC has concluded that exceptional circumstances cannot be fully evidenced and justified to make changes to the Green Belt boundaries in the borough to meet 30% shortfall of meeting Local Housing Need.

Green Belt

Spelthorne

SBC commissioned Arup to undertake a Stage 2 Green Belt Assessment in 2019. This builds upon work undertaken in the Stage 1 Green Belt Assessment (2018). The review has been prepared in accordance with the National Planning Policy Framework (NPPF).

The stage 1 study assessed how far Local Areas of land in the borough meet the Green Belt purposes set out in the NPPF. The Stage 2 Green Belt Assessment was then undertaken to build on the Stage 1 Green Belt Assessment at a finer grained level to assess the performance of

smaller sub areas. The assessment considered the performance of sub-areas against the NPPF purposes and the role and importance of these in terms of the function of the wider Green Belt. The Council has subsequently undertaken a Stage 3 Green Belt Assessment in house to consider specific individual parcels identified for potential release from the Green Belt through the Local Plan. This assessment has utilised a similar methodology used for the Stage 1 and Stage 2 Green Belt Assessments for consistency.

The assessment and subsequent assessment work has concluded that exceptional circumstances have been demonstrated justifying a release of Green Belt for housing development, recognising the inability of the Borough to meet the local housing need figure derived from the standard method for calculating need without releasing this land. Consideration has been given to the range of potential options to meet this need, including greater density of development in the built-up area and the possibility of neighbouring authorities taking up any unmet need. This has not offered any alternative options for meeting the full housing need identified through the standard method.

Elmbridge

EBC commissioned Arup Ove to undertake two Green Belt Assessments. The first, Green Belt Boundary Review (GBBR) was published in 2016 and examined the performance of the Green Belt in and around Elmbridge against the Green Belt Purposes, as set out in the NPPF. The analysis was undertaken at two scales: Strategic Areas and Local Areas.

The 2018 Supplementary Review was a more spatially focused piece of work to better understand the performance of smaller 'sub-areas' against the Green Belt purposes, as well as their context in relation to the wider Green Belt (Local Areas and Strategic Areas, as assessed through the 2016 GBBR).

In addition to the above, the Council has also undertaken further evidence base work on the Green Belt:

- Green Belt Boundary Review – Assessment of Weakly Performing Local Areas 2019: The assessment identifies the extent of development potential within each Local Areas considered to be 'weakly performing' as part of the GBBR 2016 and sets out whether there is an opportunity for large / small-scale development or no development.
- Green Belt Boundary Review – Accessibility Assessment, June 2019: This assessment looks at the sustainability of specific Green Belt areas (weakly performing and smaller sub-divisions) using a range of accessibility standards.
- Green Belt Boundary Review – Assessment of Previously Developed Land, June 2019: This assessment looks at the level of Previously Developed Land (PDL) within specific Green Belt areas (weakly performing and smaller sub-divisions).
- Green Belt Site Proforma – Utilising the information from the above documents and other evidence base documents, the pro-forma considers specific areas of land for potential release from the Green Belt.

The evidence base documents set out that alongside further assessments and evidence base documents, they will be used to inform the Council's preferred approach for the Local Plan and site selection. This includes whether exceptional circumstances exist to justify releasing land from the Green Belt.

EBC's rationale for its proposed development strategy is set out in the Topic Paper: How the Spatial Strategy was formed (June 2022). The Paper sets out the options assessed when

considering how to address the Borough's housing need and includes the Council's consideration of whether exceptional circumstances are fully evidence and justified to release land from the Green Belt. The Paper sets the rationale for the Council's recommended spatial strategy within the draft Local Plan, promoting sustainable development and place-making ambition and responding to the Council's commitment to tackle climate change.

On-going Duty to Cooperate Discussions

A meeting was held on 18 October 2022 to discuss their respective responses to the Regulation 19 Stages in more detail focusing on the matters of Housing and Green Belt.

At this meeting and through further written correspondence between the two authorities including discussions over the advice received by SBC from their Planning Inspectorate Advisory visit, it has been agreed by SBC and EBC:

- To prepare a draft SoCG setting out the outstanding matters that are being discussed and update this as discussions progress.
- Respond to the points raised in each other's Regulation 19 representations (see Appendix A).
- To set out and share the constraints to development with their respective Boroughs to help explore each authority has arrived at its preferred spatial strategy (see Appendix B).
- To explore the possibility of a joint PINS Advisory Meeting following EBC's Advisory visit.
- To continue discussions and keep each other and PINS / DLUHC informed of our progress.

In addition, SBC has prepared additional work to explore its constraints in more detail, particularly Green Belt performance. This includes those parcels of land discounted since the Preferred Options consultation. This work was undertaken to determine whether the spatial strategy is justified and the impacts of a higher growth scenario. This work was shared with EBC on 6 January 2023 as part of a topic paper on the Duty to Cooperate with Elmbridge BC.

EBC notes the additional work undertaken by SBC on testing a higher growth scenario in response to the Regulation 19 representations received including, that from EBC. The outcomes of the additional work as set out in SBC's Topic Paper 4 are acknowledged by EBC.

SBC requested that EBC undertake a similar exercise to ensure that all options have been fully considered in order to boost supply as much as possible. EBC's position is that this exercise has already been undertaken in regard to the performance of Green Belt sites and does not require revisiting.

Following EBC's PINS Advisory Meeting on 23 November 2022, it was agreed by both authorities that a joint PINS Advisory Meeting was not required.

The two authorities met 23 October 2024 to update on the status of their respective Local Plans and any strategic planning issues, the note of this meeting can be found in [Spelthorne BC Addendum to Duty to Cooperate Compliance Statement December 2024](#). There was a further meeting on the 3 December 2024 to discuss updating the SoCG between the two authorities.

Constraints analysis:

Both authorities agree that a similar approach has been followed in assessing the constraints present in each borough, with absolute constraints taken account of and other non-absolute constraints subject to robust assessment to determine how this may impact development

options. Across the two authorities it is agreed that there are a notable number of constraints present, thus restricting development options.

Whilst there is a degree of similarity in the approach taken to assessing constraints and the conclusions drawn from these impacts, there has been differentiation in the weight given to the constraints and how this has subsequently led to the development of the spatial strategy of each authority. Having reviewed the constraints in detail, each authority feels that their Local Plan spatial strategy is justified.

Duty to Cooperate:

Neither party has objected to each other's Regulation 19 Local Plan for failing to comply with the duty. It is a duty that requires cooperation, not agreement, and the two authorities agree that they have cooperated in an ongoing and effective manner as set out in their respective Statements of Compliance and associated updates, as well as this SoCG.

Both parties agree that cooperation has taken place to fulfil the requirements of the Duty to Cooperate.

At the time of writing, the outstanding need identified of Elmbridge remains the current position.

Matters not specifically addressed in this Statement of Common Ground

The two parties agree:

The following matters are defined in the NPPF as strategic matters but are not specifically addressed in the context of this Statement of Common Ground.

- Gypsies, Travellers, and Traveller Show people;
- Houseboat Dwellers;
- Employment, retail and leisure;
- Transport;
- Flooding;
- Green & Blue Infrastructure;
- Climate Change;
- Historic Environment; and
- Heathrow Airport.

The authorities agree that the engagement undertaken on these issues as set out in their respective Duty to Cooperate: Statement of Compliance documents is, an accurate record and that there are no unresolved issues.

It is also agreed that the authorities will continue to work on these matters as appropriate.

5. Governance Arrangements

The authorities are committed to working positively together, sharing information and best practice, where appropriate, throughout the final stages of their plan preparation and beyond. This co-operation and collaboration takes place at senior member, chief executive, and senior officer as well as at technical officer level.

Joint working will include the following existing governance arrangements:

- Surrey Leaders;
- Surrey Chief Executives;
- Surrey Futures;
- The Surrey Planning Officers' Association (SPOA);
- Surrey Planning Working Group (PWG); and
- Heathrow Strategic Planning Group (HSPG).

In terms of governance, the authorities agree:

- that in response to any new evidence / changes in circumstances, informal discussions will occur between the two authorities on the cross-boundary issues referred to in this SoCG in the form of officer level meetings with escalation of matters to Member level where necessary;
- that this SoCG will be reviewed at the above meetings or, when required by either authority e.g. for the purpose of their Examination.
- To continue to work collaboratively on plan preparation and evidence, whilst acknowledging others' timetables and timescales; and
- To respect each other's right to develop their own plans that fit the specific circumstances of the local authority's communities.

Appendix 1: Elmbridge Borough Council's Regulation 19 Representation to Spelthorne Borough Council's draft Local Plan - June 2022

Elmbridge Borough Council's (EBC) Representation	Spelthorne Borough Council's (SBC) Response
<p>EBC queried how SBC's approach to meeting its housing requirement is consistent with paragraphs 11b(ii) and 124 (for example) of the NPPF and how, overall, it has been positively prepared.</p> <p>EBC raised the query in response to the draft Local Plan foreword which stated that: "the net effect will be to increase housing densities and make Spelthorne a less attractive place to live" and, that development within the town centres will consist of "sterile, high-rise blocks", "something that no Councillor wants to support".</p>	<p>Despite frustrations being vented by our politicians over the Government's standard method, the Council voted in favour of the Local Plan by a majority of 3:1 as it supported a strategy that meets our housing need in full, however that figure is arrived at.</p> <p>The Local Plan is considered to be supported by a balanced spatial strategy that considers local needs, character and available evidence to ensure it positively seeks to meet the requirements of the current and future community.</p> <p>The foreword has been removed from the submission Local Plan.</p>
<p>In regard to the Topic Paper (Background to Strategy and case for Exceptional Circumstances to amend Green Belt boundaries) EBC noted that this was published on SBC's website on 25 July 2022; five weeks after the Regulation 19 Stage started on 15 June 2022.</p> <p>EBC set out two questions in regard to this point:</p> <ol style="list-style-type: none"> 1. How SBC will deal with any representations submitted before 25 July 2022 that have been made without the full evidence available which is fundamental to understanding the strategy of the draft Local Plan? 	<p>The consultation period was extended to allow sufficient time for further comments. The opportunity was present for those who had previously submitted comments earlier in the consultation process to submit additional representations to the consultation.</p> <p>Members were advised throughout the preparation of the Plan of key evidence to inform their decisions, even if final versions or updates were not published until later in the process. It is noted that Elmbridge referred to documents during their own recent Regulation 19 consultation that were not made publicly available and as this remains the case, so we have requested sight of these. They</p>

<p>2. How has this evidence base document informed the preparation of the draft Local Plan and was taken into account in the Council's decision-making process?</p>	<p>include their Exceptional Circumstances paper.</p>
<p>More fundamentally, EBC queried the robustness of the consideration of exceptional circumstances for the release of the Green Belt and how, and at what stage, this information was taken into account in the decision-making process given the publication date of the Topic Paper.</p>	<p>Whilst the topic paper was published after the start of the consultation, this is not a decision-making document in itself and instead sets out the process as to how the spatial strategy was devised. The spatial strategy and the justification for Green Belt release has been informed by the NPPF, evidence on housing supply and need, Duty to Cooperate discussions as well as the Green Belt Assessment study to determine whether exceptional circumstances existed. Evidence has informed discussions with Members and spatial strategy consultation options with it determined that Exceptional Circumstances do exist to justify Green Belt release.</p>
<p>EBC raised concern as to where / how within the process, SBC has taken into account the unmet housing needs of neighbouring authorities.</p> <p>It was noted that SBC makes reference to EBC and its draft Local Plan throughout the Topic Paper, acknowledging our unmet housing need. However, at no stage does the Topic Paper set out how this was taken into account in forming the preferred spatial strategy for Spelthorne Borough and the weight given to this in determining the amount of Green Belt to be released.</p> <p>It was asked whether SBC tested through its evidence base the possibility of delivering above its Standard</p>	<p>Whilst an option to deliver housing at a level higher than our OAN figure was considered at the Issues & Options stage, we have taken the opportunity to review this position again in light of representations made at Regulation 19. The conclusion is that delivering a higher number of homes to assist neighbours would necessitate further Green Belt release, which would result in adverse impacts that would not be outweighed by the benefits and, as such, exceptional circumstances do not exist. In any case, Spelthorne does not consider Elmbridge to have evidenced its own position that they are unable to meet their housing need in full and that they do not have exceptional circumstances to release any Green Belt. Elmbridge is the only neighbour who has asked us to assist in meeting their housing need.</p>

<p>Methodology requirement (which has varied over the preparation of the draft Local Plan) in order to assist in meeting potential unmet housing need from neighbouring authorities?</p>	
<p>In regard to the Green Belt, EBC asked how the strategy aligns / or how SBC has taken into account and considered paragraph 143 of the NPPF which states that when defining Green Belt boundaries, plans should:</p> <p>“ c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period.</p> <p>e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period”.</p>	<p>The Local Plan extends for a period of 15 years and aims to meet needs in full. The Local Plan strategy has been developed to meet current development needs and will be reviewed at the five-year stage so determine if it is still up to date. The future beyond the plan period is uncertain therefore it is not considered necessary to safeguard land for development.</p>
<p>With reference to the document “Discounted Alternative Site Allocations – Officer Site Assessment (May 2022)”, EBC queried the planning justification as to why two sites have been discounted.</p> <p>The two sites were: HS1/010 - Land to the South and West of Stratton Road, Sunbury and RL1/007 Land off Worple Road, Staines.</p> <p>EBC stated it was unclear how these sites are to be considered substantially ‘larger’ in comparison to a site that is proposed for allocation and thus</p>	<p>The allocated sites have been robustly assessed using the Council's site selection methodology where they were deemed to fulfil the Local Plan strategy and identified as suitable for allocation based on planning judgement. The sites identified for allocation were agreed by members of the Local Plan Task Group and subsequently agreed by Full Council by majority. The inclusion of smaller sites is deemed to aid the dispersal of impact across the borough and reduce the opportunity for concentrated adverse impacts, including on the specific settlement area in which they are sited.</p> <p>A piece of work has been undertaken since the Reg 19 consultation to further</p>

discounted. It was stated that the approach appears inconsistent.

consider the potential impacts of the release of the Green Belt allocation sites discounted following the Preferred Options consultation. The sites referred to by EBC were included in this work and it was concluded that the cumulative impacts of additional Green Belt release would have a greater number of adverse impacts than positive.

Appendix C October to November 2024 neighbouring authorities meeting notes

Spelthorne DtC meeting – 11th October 2024

Attendance:

Spelthorne: Martin Horn, Jane Robinson, Laura Waters

LBH: Duncan Mckane and Ravneet Dyal

Local Plan review recap

LBH: presented the Local Plan review timeline

Strategic matters discussion:

LBH: presented an overview of the proposed spatial strategy

Housing

LBH: Presented the proposed LBH housing approach

- LBH: Discussion on LBH housing target figures (including approach to target beyond the 2019-2029 London Plan target)
- Spelthorne: Raised issue of highways impacts related to housing growth in LBH, specifically to the A30/B378 Bulldog Junction
- LBH: Confirmed a refresh of the transport assessment has been undertaken which showed no need for further modelling due to reduced overall demand for housing and jobs.
- Spelthorne: Note Site Allocation 121 – Land South of Bedfont Road. How did you calculate capacity for travelling show people sites?
- LBH: We will ask policy officer involved (Chris Kirk) to explain approach further - **ACTION**

Economic development

LBH: Presented the economic development headlines for Local Plan

- Spelthorne: Acknowledged and expressed support for approach.

Greenbelt, Green and Blue Infrastructure

LBH: Presented the Greenbelt, Green and Blue Infrastructure headlines for Local Plan – including update on proposed green belt release sites.

Transport connectivity

LBH: Provided an update on transport connectivity,

- Spelthorne: Question relating to Heathrow Southern Railway
- LBH: Presented map on the indicative southern access link to Heathrow route. Transport colleagues have advised the scheme has not been sufficiently developed, with no final decisions on the route. As such the emerging plan does not propose safeguarding of land or allocations for development which might be made sustainable by this infrastructure improvement (as was proposed in withdrawn WoB plan)
- Spelthorne: Early consideration of feasibility of a Southern Light Rail link: Confirmed no preferred option currently exists. Both heavy and light rail are still being considered, with an internal working group being established to assess the potential options.

- Spelthorne: Asked about the potential A30/B378 Bulldog Junction impact and the need for an agreement between parties regarding highways, asking whether Surrey County Council would also be involved.
- LBH: Noted past discussions with Surrey and suggested that a Statement of Common Ground (SoCG) between LBH and SBC could suffice, with Surrey involved if needed.
 - LBH will update after speaking with Surrey, with potential for a co-signatory option if this is considered the most effective route to demonstrating joint working on the issue.

Energy and Carbon Reduction Policy

Both parties briefly discussed the energy and carbon reduction policy, noting LBH opted for Option 1 in the "Delivering Net Zero" (2023) evidence base (i.e. Part L framework approach)

AOB

- Spelthorne: Provide update about Spelthorne's local plan review progress, currently seeking to recommence examination following pause

Spelthorne/Slough Duty to cooperate meeting 21st October 2024

Introductions	
<p>Laura Waters – Spelthorne BC Jane Robinson – Spelthorne BC Laura Richardson - Spelthorne BC Pippa Hopkins – Group Manager Slough BC Kerry Hobbs – Senior Planning Policy officer Slough BC</p>	
Spelthorne Borough Council Local Plan update	
<p>Spelthorne BC officers shared slides updating on the core objectives of the Local Plan submitted to the Inspector for examination:</p> <ul style="list-style-type: none"> • 618 homes per year over 15 years (9,270) • Looked to increase density in developed areas to protect green belt • Reduce impact on Staines to avoid additional housing allocations in the town beyond those already identified • Reduce some building heights in Staines through zoning • Allow for more family homes with gardens to be built. <p>A brief overview was provided on population, land use and constraints.</p>	
Timeline and work to date	
<p>Spelthorne BC officers ran through the previous LP consultations going back to issues and options in May-June 2018 up to the first week of examination hearings in May 2023. JR then outlined the decision to pause the hearings in June 2023 with Members in Feb 2024 requesting a modification to:</p> <ul style="list-style-type: none"> • Remove all but 2 Green Belt sites • Remove sites high risk of flooding or move to back of local plan period if appropriate <p>In July 2024 Committee proposed a further mod to Inspector:</p> <ul style="list-style-type: none"> • Removal of specific sites • Propose new policy wording for sites at flood risk. 	
Next steps	
<p>SoCG has been signed with the EA:</p> <ul style="list-style-type: none"> • Revised wording for relevant site allocations • Proposed removal of five sites <p>The Chair of the Environment and Sustainability Committee has written to the Inspector updating on progress and next steps. Report going to Council 24th October asking Members to consider if they wish to amend the GB sites main mod agreed Feb 2024. If agreed by Council request will be made to Inspector to resume examination hearings aiming for Jan/Feb 2025</p>	
Slough Update	
Local Plan	
<p>PH explained a SoCG had been agreed previously and likely only minor updates may be required for example Slough BC is</p>	

<p>no longer accountable body for Heathrow Strategic Planning Group.</p> <p>Slough BC have completed to Reg 18 and are progressing evidence base. Currently unable to meet housing and employment land needs within the Local Plan area. Standard policy response has been to support neighbouring Councils to meet their needs, or not impact on Slough BC. E.g. Wider Area Growth Study (2022) addresses housing land supply in the TTWA. In Nov 2024 adopted a new 10yr Simplified Planning Zone that permits an increase in employment floorspace.</p> <p>PH updated Slough is experiencing pressure from datacentres: two employment sites close to train stations that would have been proposed for housing in new Plan will now be datacentres. Green Belt remains under pressure from speculative development too, this and the Strategic Gap ['higher bar' than GB to development] will be reviewed ahead of Reg 19 for LP. Currently have a 2.2 year housing land supply. Standard methodology figure is 856 homes per annum, draft NPPF calculation results in a negligible change</p>	
Any other duty to cooperate matters	
<p>LR/JR updated employment is also going to be a challenge for Spelthorne BC with sites lost to residential but these are not always most suitable for this use type.</p> <p>Gypsy and Travellers –Slough will engage with Spelthorne when they do their study, at present no issue.</p> <p>Employment land supply– noted, no issue at present for Slough BC: Support collaboration via HSPG on LHR</p> <p>Flooding – no issue, noted EA changing flooding from 2025</p> <p>Transport – noted around Heathrow</p> <p>No other matters to update.</p>	
Any strategic issues	
Strategic matters remain unchanged with Heathrow only major issue, no other matters to update.	
Next steps/actions	
<p>Share note of this meeting with Slough BC.</p> <p>Slough BC to confirm there have been no substantive change in issues and make any minor amendments.</p> <p>Add note to Spelthorne BC DTC statement addendum</p> <p>Once both parties are agreed sign and date SoCG</p>	<p>LW PH/KH</p> <p>LW ALL</p>

Spelthorne/Royal Borough of Windsor & Maidenhead Duty to cooperate meeting 21st October 2024

Introductions	Actions
<p>Laura Waters – Spelthorne BC Jane Robinson – Spelthorne BC Laura Richardson - Spelthorne BC Ian Motuel – RBWM Lucinda Pinhorne-Smy – RBWM</p>	
Spelthorne Borough Council Local Plan update	
<p>SBC officers shared slides updating on the core objectives of the Local Plan submitted to the Inspector for examination:</p> <ul style="list-style-type: none"> • 618 homes per year over 15 years (9,270) • Looked to increase density in developed areas to protect green belt • Reduce impact on Staines to avoid additional housing allocations in the town beyond those already identified • Reduce some building heights in Staines through zoning • Allow for more family homes with gardens to be built. <p>A brief overview was provided on population, land use and constraints.</p>	
Timeline and work to date	
<p>SBC officers ran through the previous LP consultations going back to issues and options in May-June 2018 up to the first week of examination hearings in May 2023. JR then outlined the decision to pause the hearings in June 2023 with Members in Feb 2024 requesting a modification to:</p> <ul style="list-style-type: none"> • Remove all but 2 Green Belt sites • Remove sites high risk of flooding or move to back of local plan period if appropriate <p>In July 2024 Committee proposed a further mod to Inspector:</p> <ul style="list-style-type: none"> • Removal of specific sites • Propose new policy wording for sites at flood risk. 	
Next steps	
<p>SoCG has been signed with the EA:</p> <ul style="list-style-type: none"> • Revised wording for relevant site allocations • Proposed removal of five sites <p>The Chair of the Environment and Sustainability Committee has written to the Inspector updating on progress and next steps. Report going to Council 24th October asking Members to consider if they wish to amend the GB sites main mod agreed Feb 2024. If agreed by Council request will be made to Inspector to resume examination hearings aiming for Jan/Feb 2025</p>	
Windsor & Maidenhead Update	
Local Plan	
<p>IM updated that RBWM experienced many of the same issues as SBC with their examination taking 4 years to complete.</p>	

<p>Working with their Inspector to address issues with the submitted plan. Politically challenging throughout process. In Feb 2022 the Local Plan was adopted. A high court challenge was raised which took a year to get through and in May 2023 there was a change of administration.</p> <p>No immediate plans to undertake a new Local Plan but a review will need to be undertaken 5 years after adoption. Currently concentrating on a suite of SPDs including the adoption of Sustainability, and Tall Building SPDs.</p> <p>The proposed NPPF housing methodology has seen a 55% increase in housing numbers compared to current housing need figure. Constraints such as flooding may reduce numbers. Considering a Gypsy & Traveller Local Plan but this has been put on hold with the current focus being on progressing further SPDs.</p>	
Any other duty to cooperate matters	
IM confirmed RBWM submitted a Regulation 19 response to SBC Local Plan with no significant issues raised. Comments were provided on cross boundary issues such as transport, infrastructure, employment and flooding.	
Any strategic issues	
No further issues raised.	
Next steps/actions	
<p>Share note of this meeting with RBWM.</p> <p>RBWM to confirm there have been no substantive change in issues and make any minor amendments</p> <p>Add note to SBC DTC statement addendum</p> <p>Once both parties are agreed sign and date SoCG</p>	<p>LW IM/LP</p> <p>LW All</p>

Spelthorne/Surrey CC Duty to cooperate meeting 22nd October 2024

Introductions	Actions
<p>Laura Waters – Spelthorne BC Jane Robinson – Spelthorne BC Laura Richardson - Spelthorne BC Judith Jenkins – Surrey CC Anna Bird – Surrey CC</p>	
Spelthorne Borough Council Local Plan update	
<p>SBC officers updated on the core objectives of the Local Plan submitted to the Inspector for examination:</p> <ul style="list-style-type: none"> • 618 homes per year over 15 years (9,270) • Looked to increase density in developed areas to protect green belt • Reduce impact on Staines to avoid additional housing allocations in the town beyond those already identified. • Reduce some building heights in Staines through zoning • Allow for more family homes with gardens to be built. <p>A brief overview was provided on population, land use and constraints.</p>	
Timeline and work to date	
<p>SBC officers ran through the previous LP consultations going back to issues and options in May-June 2018 up to the first week of examination hearings in May 2023. JR then outlined the decision to pause the hearings in June 2023 with Members in Feb 2024 requesting a modification to:</p> <ul style="list-style-type: none"> • Remove all but 2 Green Belt sites • Remove sites high risk of flooding or move to back of local plan period if appropriate <p>In July 2024 Committee proposed a further mod to Inspector:</p> <ul style="list-style-type: none"> • Removal of specific sites • Propose new policy wording was also put forward for sites at flood risk. Focussed on brownfield sites in the Local Plan to protect them from flooding. 	
Next steps	
<p>SoCG has been signed with the EA:</p> <ul style="list-style-type: none"> • Revised wording for relevant site allocations • Proposed removal of five sites <p>The Chair of the Environment and Sustainability Committee has written to the Inspector updating on progress and next steps. Report going to Council 24th October asking Members to consider if they wish to amend the GB sites main mod agreed Feb 2024. If agreed by Council request will be made to Inspector to resume examination hearings aiming for Jan/Feb 2025</p> <p>JR will share revised policy wording for policy E3 for SCC to formally respond to.</p>	

<p>Proposing an early/immediate review policy within the LP. Inspector given time that has lapsed may request an additional pre-consultation hearing. Expecting hearings to last a minimum of 2 weeks Ahead of examinations will have a clearer timeline for next plan review. Whole suite of new evidence will need to be prepared.</p>	
Surrey CC Update	
<p>JJ asked if SBC requires anything from SCC? LR updated reduced numbers due to sites being removed will reduce pressure on infrastructure but a separate letter on amended flood policy E3 would be welcomed. Transport assessment will be required for LP review. SCC has recently had a DTC meeting with Hounslow, happy with transport matters but asked how the SCC and Spelthorne SoCG with Hounslow will sit together. JR updated SBC/Hounslow met 11/10/24 and discussed transport and updating the previous SoCG. Hounslow talked through history of SoCG and SCC had issues with cross boundary impacts and if mitigation can be provided cross border – wording has been provided so SCC now happy with SoCG. SCC will share SoCG with Hounslow with SBC. It may be that Spelthorne simply reference the SCC SoCG for transport matters. Hounslow consulting on transport strategy this week. SCC will share for information the education forecasts on school places needed. JR updated the Sixth Form provision currently in LP will depend on outcome of the LP examination.</p>	
Any other duty to cooperate matters	
No other matters to update.	
Any strategic issues	
No other matters to update.	
Next steps/actions	
Share note of this meeting and latest SoCG with SCC	LW
SCC provide letter on amended policy E3	JJ
SCC to share SoCG with Hounslow	JJ
SCC to share education forecasts	JJ
Add note to SBC DTC statement addendum	LW

**Spelthorne/Runnymede Borough Council Duty to cooperate meeting
22nd October 2024**

Introductions	
Laura Waters – Spelthorne BC Jane Robinson – Spelthorne BC Laura Richardson - Spelthorne BC Judith Orr – Runnymede BC	
Spelthorne Borough Council Local Plan update	
<p>SBC officers shared slides updating on the core objectives of the Local Plan submitted to the Inspector for examination:</p> <ul style="list-style-type: none"> Identified housing need of 618 homes per year over 15 years (9,270). JO asked what the figure in the new draft NPPF has proposed in terms of the transitional arrangements? JR updated the proposed figure has increased from 618 to 755, so within the 200-figure set out in the transitional arrangements.¹ Following on from this JO asked if the Plan is meeting housing needs in full. JR stated that the SBC Plan is seeking to meet its housing need in full, although SBC acknowledges that as it stands, longer term needs (years 11-15) cannot be met and will need to be addressed through its early review of the Plan. The approach in the Plan looks to increase density in developed areas to protect green belt. 0.7% GB released to allow for more family homes with gardens to be built and deliver community benefits such as new sixth form college and replacement community centre <p>A brief overview was provided on population, land use and constraints.</p>	
Timeline and work to date	
<p>SBC officers ran through the previous LP consultations going back to issues and options in May-June 2018 up to the first week of examination hearings in May 2023. JR then outlined the decision to pause the hearings in June 2023 with Members in Feb 2024 requesting a modification to:</p> <ul style="list-style-type: none"> Remove all but 2 Green Belt sites Remove sites high risk of flooding or move to back of local plan period if appropriate <p>In July 2024 Committee proposed a further mod to Inspector:</p> <ul style="list-style-type: none"> Removal of specific sites Propose new policy wording for sites at flood risk. <p>LR is looking forward to the next LP that needs to be prepared</p>	
Next steps	
<p>SoCG has been signed with the EA:</p> <ul style="list-style-type: none"> Revised wording for relevant site allocations 	

¹ Since this meeting the NPPF Dec 2024 has been published with a revised Local Housing Need figure of 793 per annum for Spelthorne BC.

<ul style="list-style-type: none"> Proposed removal of five sites <p>The Chair of the Environment and Sustainability Committee has written to the Inspector updating on progress and next steps. Report going to Council 24th October asking Members to consider if they wish to amend the GB sites main mod agreed Feb 2024. If agreed by Council request will be made to Inspector to resume examination hearings aiming for Jan/Feb 2025</p>	
Runnymede BC Update	
NPPF proposed housing methodology has increased from 546 to 620 (an increase of 14%).	
Local Plan	
<p>The Council is intending to prepare an update to their existing local plan under the new planning system. A report on the new LDS is going to Planning Committee on 23rd October and is available to view online. Work is programmed to commence on the update to the Plan in September 2025 but in the meantime, work is underway to procure and start evidence gathering in advance of this. The Council has contacted the MHCLG to notify them of their intention to commence work on the update to the Plan under the new planning system and put forward their wish to be a front runner for this work.</p> <p>As part of the evidence gathering work, Runnymede are reviewing their Green Belt work from the Runnymede 2030 Local Plan with the consultants ARUP. This review is being undertaken largely as a result of the Tandridge Local Plan where the Inspector considered their Green Belt Review (undertaken in 2018) to be out of date when it was considered at Examination in 2024. The extent of the RBC Green Belt work has recently been expanded, as a result of the publication of the draft NPPF, to include an assessment of grey belt in RBC. JR asked if it was possible to share any update on this work with SBC.</p> <p>Longcross, there was a recent outline planning permission permitted (subject to the signing of the S106 agreement) for up to 1,700 dwellings on the southern part of the site.</p>	
Any other duty to cooperate matters	
<p>JO said that there was some concern from communities in Runnymede about flooding being caused by proposed development in Staines. In particular, she asked whether her understanding was correct (and which has underpinned the Council's position of 'no objection' on this point) that the Plan is proposing replacement buildings in Staines with a physical footprint of the same size. She wanted to know the EA's feedback on this. JR confirmed that caveats had been added to specific sites regarding built footprints whilst others had been moved to years 6-10 or years 11-15 to allow for provision of safe access and egress (Full details are included in the letter Cllr Beecher sent to the Inspector 25th Oct). She outlined that the main feedback from the EA related to access & egress and routes in/out of the town centre. The EA won't allow references to the River Thames Schemes to be referred to but negotiations</p>	

with SBC have resolved the issue by agreeing amended policy wording between them.	
Any strategic issues	
No further issues raised.	
Next steps/actions	
Share meeting note and previous SoCG with Runnymede BC Runnymede BC to confirm there have been no substantive change in issues since 2019 and update date of SoCG. Add note to SBC DTC statement addendum	LW JO LW

Spelthorne/London Borough of Richmond Duty to cooperate meeting 5th November

Introductions	
<p>Laura Waters – Spelthorne BC Jane Robinson – Spelthorne BC Joanne Capper – Richmond Jordan Pratchett – Richmond Fiona O’Toole - Richmond</p>	
Spelthorne Borough Council Local Plan update	
<p>SBC officers shared slides updating on the core objectives of the Local Plan submitted to the Inspector for examination:</p> <ul style="list-style-type: none"> • 618 homes per year over 15 years (9,270). • Looked to increase density in developed areas to protect green belt • Reduce impact on Staines to avoid additional housing allocations in the town beyond those already identified • Reduce some building heights in Staines through zoning • Allow for more family homes with gardens to be built. <p>A brief overview was provided on population, land use and constraints.</p> <p>JC noted proposed early review and asked about documents/evidence needing updating for resumed examination hearings? JR explained following advice examination proceeds based on documents submitted. Early review policy included to cover issues such as Gypsy & Travellers and employment sites – example provided of Hertfordshire early review policy.</p>	
Timeline and work to date	
<p>SBC officers ran through the previous LP consultations going back to issues and options in May-June 2018 up to the first week of examination hearings in May 2023. JR then outlined the decision to pause the hearings in June 2023 with Members in Feb 2024 requesting a modification to:</p> <ul style="list-style-type: none"> • Remove all but 2 Green Belt sites • Remove sites high risk of flooding or move to back of local plan period if appropriate <p>In July 2024 Committee proposed a further mod to Inspector:</p> <ul style="list-style-type: none"> • Removal of specific sites • Propose new policy wording for sites at flood risk. <p>LR is looking forward to the next LP that needs to be prepared</p>	
Next steps	
<p>Council 24th October approved recommendations to include green belt sites and write to Inspector requesting examination hearings resume. The Chair of the Environment and Sustainability Committee has written to the Inspector updating on progress and next steps.</p> <p>Now awaiting Inspectors response, further MIQs, confirmation of examination timeline and deadlines. Requests have been made</p>	

to update housing topic paper, trajectory, IDP and activity undertaken since the pause. JC noted that in terms of cross-boundary implications, the recent modifications are unlikely to raise new issues (noting Richmond did not raise any concerns to the Regulation 19 Draft Plan consultation in 2022).	
Richmond Update	
Local Plan	
Submitted Local Plan January 2024, hearings held June/July 2024 and progressing well. Inspector reviewed housing delivery overall and questioned the impact of additional policy requirements including affordable housing (in light of fast-track viability threshold in the London Plan), climate change and biodiversity net gain. Now awaiting formal modifications and aiming to have consultation out by the end of the year. Hearing action points captured where modifications required and expecting to hear shortly with inspectors' report hopefully early 2025 and adoption spring/summer. Outstanding matters speaking with relevant parties to resolve including GLA on affordable housing. No changes from Regulation 19 that would impact Spelthorne BC, there is an action plan to address housing delivery test with a stepped housing trajectory. Own G&T needs assessment but there is a London wide one, consultants RRR. Working with authorities who have undertaken their own surveys, utilising existing data and carrying out fieldwork. Expecting mayor will publish in the future to inform next London Plan. JR did note the lack of guidance on site size requirements for travelling show people.	
Any other duty to cooperate matters	
JC asked if there is any update on Kempton racecourse? JR confirmed they made representations but not sure at this time how this will progress. JC noted concerns of impact on surrounding area of any large-scale development. JR also noted Running Horse appeal which is close to Richmond and has concluded after 9 days.	
Any strategic issues	
Continue to work strategically on green belt and flooding matters.	
Next steps/actions	
Share meeting note and previous SoCG with Richmond Richmond to confirm there have been no substantive change in issues and update date of SoCG. Add note to SBC DTC statement addendum	LW JC LW

Spelthorne/Hillingdon Duty to cooperate meeting 5th November

Introductions	
Laura Waters – Spelthorne BC Jane Robinson – Spelthorne BC Laura Richardson - Spelthorne BC Gavin Polkinghorn – London Borough of Hillingdon	
Spelthorne Borough Council Local Plan update	
SBC officers shared slides updating on the core objectives of the Local Plan submitted to the Inspector for examination: <ul style="list-style-type: none"> • 618 homes per year over 15 years (9,270). • Looked to increase density in developed areas to protect green belt • Reduce impact on Staines to avoid additional housing allocations in the town beyond those already identified • Reduce some building heights in Staines through zoning • Allow for more family homes with gardens to be built. A brief overview was provided on population, land use and constraints	
Timeline and work to date	
SBC officers ran through the previous LP consultations going back to issues and options in May-June 2018 up to the first week of examination hearings in May 2023. JR then outlined the decision to pause the hearings in June 2023 with Members in Feb 2024 requesting a modification to: <ul style="list-style-type: none"> • Remove all but 2 Green Belt sites • Remove sites high risk of flooding or move to back of local plan period if appropriate In July 2024 Committee proposed a further mod to Inspector: <ul style="list-style-type: none"> • Removal of specific sites • Propose new policy wording for sites at flood risk. JR explained when the government intervened, they set out that the Local Plan couldn't be withdrawn and either had to be progressed or paused but active steps taken to move forward. LR is looking forward to the next LP that needs to be prepared	
Next steps	
Council 24 th October approved recommendations to include green belt sites and write to Inspector requesting examination hearings resume. The Chair of the Environment and Sustainability Committee has written to the Inspector updating on progress and next steps. Now awaiting Inspectors response, further MIQs, confirmation of examination timeline and deadlines. Requests have been made to update housing topic paper, trajectory, IDP and activity undertaken since the pause.	
Hillingdon Update	
Local Plan	
Since last meeting Hillingdon have undertaken Regulation 18 call for views consultation, currently drafting policies, collecting	

<p>evidence and processing consultation responses. Our current LDS programme is to meet June 2025 submission date to SoS. No draft policies or site allocations are available to share currently.</p> <p>Hillingdon housing targets are set by the London Plan which will remain in place until the London Plan is updated. Hillingdon's target will be 1,083 dwellings per annum for most of the plan period. Toward the end of the plan period London Plan ends and the Council will need to establish targets for this time which will be subject to transitional arrangements set by the GLA.</p> <p>Hillingdon Council will be following changes to NPPF on Green Belt and Grey Belt, which will have impacts on plan making for Hillingdon. It is too early in the plan process to determine whether residential and non-residential needs can be met without Green Belt review.</p>	
Any other duty to cooperate matters	
<p>Gypsy & Traveller - awaiting outcome of needs assessment expected to be published early 2025.</p> <p>Employment no change and can meet industrial need through existing sites.</p> <p>Evidence flooding for part 2.</p> <p>Energy no updates.</p>	
Any strategic issues	
Heathrow planning application – can ask colleague if this has been validated	
Next steps/actions	
<p>Hold next Meeting once Hillingdon policies and sites formalised</p> <p>Share meeting note and previous SoCG with Hillingdon</p> <p>Hillingdon to confirm there have been no substantive change in issues and update date of SoCG.</p> <p>Add note to SBC DTC statement addendum</p> <p>Update on Heathrow Planning application</p>	<p>LW/GP</p> <p>LW</p> <p>GP</p> <p>LW</p> <p>GP</p>

Appendix D Letter sent to relevant bodies which are not neighbouring authorities 20 November 2024. Relevant bodies included: Historic England, Natural England, London Planning Support, Civil Aviation Authority, Homes England, Office of Rail and Road, Surrey County Council, Surrey Nature Partnership and Transport for London.

Responses received: Transport for London 21 November 2024

20 November 2024

Dear Sir/Madam,

Spelthorne Local Plan 2020 - 2035 - update

I am writing to provide an update on progress on the Spelthorne Local Plan under the Duty to Cooperate. The examination of the local plan was requested to be paused following an Extraordinary Council meeting on 6 June 2023. Since then, has occurred:

In an extraordinary meeting of the Environment & Sustainability Committee on 29 February 2024 it was decided to propose modifications of the local plan to the planning inspector. These modifications were;

1. To remove all Green Belt allocations from the local plan with the exception of the two allocations that meet the need for Gypsy, Traveler and Travelling Showpeople,
2. To remove sites at high risk of flooding, and to move some higher risk sites to be delivered in years 11-15 of the plan period to allow the River Thames Schemes to be operational and effective and for the Spelthorne design code to be completed, and
3. To withdraw the Staines Development Framework as a core document.

On 18 July 2024 it was resolved in a meeting of Council to;

1. Propose a main modification to the Inspector to remove Bridge Street Car Park/Hanover House/Sea Cadet Building and Riverside Surface Car Park as site allocations from the local plan;
2. To propose a main modification to the Inspector to agree to new policy wording in relation to site allocations at risk from access and egress issues; and
3. The Chair of the Environment & Sustainability Committee to write the Inspector with proposed modifications and request examination to be resumed.

On 24 October 2024 it was resolved in a meeting of Council to;

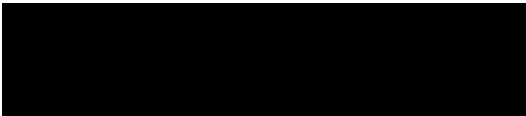
1. Note that the Environment Agency has signed a Statement of Common Ground (SoCG).
2. to propose to keep the Green Belt allocations in the Local Plan as submitted to the Planning Inspectorate on 25 November 2022.
3. Agree to delegate authority to the Group Head of Place, Protection and Prosperity in consultation with the Chair of the Environment and Sustainability Committee, to undertake any further consultation required by the Planning Inspector.
4. Agree to delegate authority to the Group Head of Place, Protection and Prosperity in consultation with the Chair of the Environment and Sustainability Committee, to prepare a main modification to the Local Plan, for a new policy on "Local Plan Early Review".

We have not yet received an update from the planning inspector regarding the resumption of the examination, but we remain optimistic that its resumption will be possible in the near future.

In light of the above update, I would like to provide an opportunity for you to raise any queries or concerns relating to the Duty to Cooperate. Should you wish to arrange a meeting to discuss any of the above, please contact me directly and the Council will be happy to accommodate this.

Yours sincerely,

Martin Horn - Senior Planning Officer (Strategic Planning)



From: [REDACTED]
Sent: 21 November 2024 10:38
To: Horn, Martin
Cc: Monika Jain
Subject: RE: Update on Spelthorne Local Plan for Duty to Cooperate bodies

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Dear Martin

Many thanks for contacting TfL with this update. We don't have any comments but I would like to ask that contact details for TfL are changed in your planning consultations database because I will shortly be leaving TfL. Please can you send any consultations or notifications regarding the Local Plan or planning policy documents to:

TfL Spatial Planning SpatialPlanning@tfl.gov.uk

Many thanks
Richard

Richard Carr | Principal Planner - Spatial Planning (He/Him/His)
TfL Planning, Transport for London
E: [REDACTED]

I work part time and so there may be a short delay in responding to emails

TfL Spatial Planning is committed to equity, diversity and inclusion and we strive to ensure that Londoners are fully represented in the planning process

For more information regarding TfL Spatial Planning, including TfL's Transport assessment best practice guidance and pre-application advice please visit: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-services>

From: Horn, Martin [REDACTED]
Sent: 20 November 2024 15:11
To: Horn, Martin <[REDACTED]>
Subject: Update on Spelthorne Local Plan for Duty to Cooperate bodies

Dear Sir/Madam,

I am contacting you as a prescribed body in planning for strategic cross boundary matters under the Duty to Co-operate. Please, find attached a letter from Spelthorne Borough Council regarding an update on the Spelthorne Local Plan progress.

I would be most grateful to hear from you if you have any comments, concerns or queries relating to the progress set out within the letter. Should you wish to discuss any of this in a meeting we would be most happy to accommodate this.

If you have any questions, please contact me directly either via email or phone.

Kind regards,

Martin Horn
Senior Planning Officer (Strategic Planning)

Spelthorne Borough Council
Council Offices, Knowle Green, Staines-upon-Thames, TW18 1XB
Tel: 01784 444272

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<https://spelthorne.inconsult.uk/antisocial>

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