

# Strategic Land Availability Assessment Methodology



## Spelthorne Takes Shape

Update 2021



## Contents

Background .....	2
Runnymede Borough Council .....	4
Spelthorne Borough Council .....	5
Methodology.....	5
Producing the SLAA.....	6
Stage 1: Identification of sites and broad locations.....	8
Stage 2: Site/broad location assessment.....	10
Step 1: Estimate the development potential of a site .....	10
Step 2: Assess the suitability of the site <sup>13</sup> .....	11
Step 3: Is the site available?.....	19
Step 4: Is the site achievable?.....	19
Stage 3: Windfall assessment (for residential development) .....	21
Sites without planning permission.....	22
Permitted Development (PD).....	22
Student accommodation and accommodation for older people .....	23
Stage 4: Assessment review.....	24
Stage 5: Final evidence base .....	25
Appendices.....	27
Appendix 1: Example of a Proforma .....	27

## Background

### National planning policy and guidance

1. The Government aims to ensure there is enough land available for the delivery of new homes. Section 5 of the National Planning Policy Framework (NPPF 2021) “Delivering a sufficient supply of homes” requires Local Authorities to demonstrate that there is sufficient land available to deliver new homes in the future. The NPPF states (para. 61 and the glossary) that the number of homes identified as being needed is to be calculated using a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach.
2. It is incumbent upon Local Planning Authorities (LPAs) to demonstrate, in accordance with paragraph 68 of the NPPF, that they have a five years’ supply of land available for housing delivery and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.
3. The NPPF and the accompanying Planning Practice Guidance (PPG), a web-based tool designed to complement policy contained within the NPPF, set out the purpose of a land availability assessment and the main steps that need to be followed to undertake these assessments. Paragraph 60 of the NPPF highlights the importance of having a sufficient supply of housing land available to support the Government’s objective of significantly boosting the supply of homes”. To boost housing supply, the NPPF sets out that local planning authorities should:

*“determine the minimum number of homes needed” (para. 61)*

*“have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment” (para. 68)*

*“identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer.” (The appropriate buffer will vary between 5 and 20% depending on the circumstances of that particular local authority. (para. 74)).*

4. Section 6 of the National Planning Policy Framework (NPPF 2021) “Building a strong, competitive economy” requires local planning authorities to identify strategic sites to meet anticipated employment needs over the plan period.
5. Paragraph 10 of the Planning Policy for Traveller Sites also requires local planning authorities to identify a supply of specific deliverable and developable sites for Gypsies, Travellers and Travelling Showmen.
6. The PPG (Housing and Economic Land Availability Assessment) contains detailed guidance on how to produce an assessment of land availability. The purpose of an assessment is set out as being to identify “a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period.” Sites included in the Strategic Land Availability Assessment (SLAA) therefore, need to be considered in terms of their suitability for

development of several different uses. The guidance contained within the PPG can be found in its [Housing and economic land availability assessment<sup>1</sup>](#) section.

- Both Runnymede and Spelthorne Councils see the benefits of undertaking a more comprehensive assessment of land and are therefore undertaking a SLAA in accordance with the PPG, which states that 'Plan-making authorities may carry out land availability assessments for housing and economic development as part of the same exercise, in order that sites may be identified for the use(s) which is most appropriate.' (*Housing and economic land availability assessment, what is the purpose of the assessment of land availability?* [paragraph 1]). However, there is no requirement set out in the PPG for LPAs to identify a five-year supply of land for economic uses. As such, each authority's SLAA will consider sites including for the following types of development:

Residential – Use Classes C2 (residential Institutions) & C3 (dwelling houses, including sites for Gypsies, Travellers and Travelling Showmen)

Economic – All E use classes (business, shop, financial and professional services, café/ restaurant, clinic health centres, gyms etc) B use classes (Industrial/ Storage and distribution). Mixed use developments comprising some of the above use classes.

- This joint SLAA methodology has therefore been written to be compliant with current national policy and guidance and local variations in the approach taken are justified in the text below.

#### **Housing Market Area and Functional Economic Area context**

- Runnymede Borough Council (RBC) and Spelthorne Borough Council (SBC) have been identified as being in the same Housing Market Area. As a result, in 2015 the two authorities jointly commissioned a Strategic Housing Market Assessment (SHMA) Report for the joint housing market area. However, as both authorities are at different stages in their Local Plan timetables, the SHMA has been updated separately for each authority but both authorities continue to work closely together.
- Both authorities' SLAA reports are based on the same agreed joint methodology, first published in December 2015 and updated in this report.
- Runnymede's FEA analysis work suggests that RBC falls into two FEAs, one facing north and including Spelthorne Borough Council and London Borough of Hounslow and the southern part of the London Borough of Hillingdon (due to the location of Heathrow Airport) and one facing south, including Woking and Elmbridge Borough Councils.
- Spelthorne's FEA analysis identifies that the Borough shares its strongest economic links with Runnymede, Elmbridge and the London Boroughs of Hillingdon and Hounslow and together these authorities sit within a Heathrow-focused FEA.
- It is clear from this analysis, that the HMA and FEA boundaries of both Boroughs overlap significantly. The Councils will therefore both continue to work with those LPAs identified in the

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<sup>1</sup> <http://planningguidance.communities.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/>

HMA and FEA work on the SLAA, as well as other Duty to Co-operate matters. The text below provides a brief outline of where each Council is with its Local Plan and its emerging evidence documents and provides a brief spatial portrait of both Boroughs.

#### **Local plan position/ evidence documents**

14. Runnymede Borough Council (RBC) adopted the Runnymede 2030 Local Plan on 16<sup>th</sup> July 2020. The Runnymede 2030 Local Plan sets out the key planning policies which determine the location, scale and timing of new development in the Borough in the period up to 2030, including the spatial development strategy, allocations for housing, employment and retail development and protection of the environment. The Local Plan also contains a suite of planning policies against which planning applications in the Borough will be determined.
15. A review of the Runnymede 2030 Local Plan began almost immediately after adoption, in line with the commitment contained at paragraph 5.19 of the Plan which states,  
  
*'The Council will commence a review of the Runnymede 2030 Local Plan as soon as possible to ensure that it is able to meet the requirement of the NPPF to complete a review of the plan within 5 years of the date of adoption of this plan. In practical terms this will mean that the Borough Council commences its review early in 2021, in order to complete a review before the summer of 2025. The Council will be revising its Local Development Scheme during 2020 to confirm the timetable for the review. In accordance with the NPPF, the review will also need to plan for a 15-year period from the date of its adoption (i.e. 2040).'*
16. The reviewed evidence documents will be available to view on [Runnymede Borough Council's website](#).
17. Spelthorne Borough Council (SBC) adopted its Core Strategy & Policies DPD and a Site Allocations DPD in 2009. The SBC Core Strategy is no longer considered to be entirely up to date given the publication of the NPPF in 2012 and as such, SBC agreed to undertake a review of its Local Plan in September 2014. Evidence base documents relating to this review can be viewed on the [Spelthorne Borough Council website](#).

#### **Runnymede Borough Council**

18. Runnymede lies in North West Surrey only 20 miles from Central London and benefits from a strategic location around the junction of the M25 and M3 motorways. Runnymede is a geographically small borough, particularly when compared with most of the other Surrey Authorities, measuring just 8 miles from north to south. There are three main towns in Runnymede: Addlestone; Chertsey and Egham. There are also a few smaller local centres and villages in Runnymede. The Borough's strategic location combined with the quality of its natural environment make Runnymede an attractive place to live work and visit.
19. Approximately 74% (5801 hectares) of Runnymede's total land area is designated Green Belt and land designated as Green Belt is subject to strict policies preventing inappropriate development.
20. Furthermore, primarily due to Runnymede's proximity to the River Thames, flooding is recognised as a particularly important issue in the borough.

### Spelthorne Borough Council

21. The Borough of Spelthorne lies in north-west Surrey and adjoins the London boroughs of Hillingdon, Hounslow and Richmond to the north, the Berkshire authorities of Windsor & Maidenhead and Slough to the west and the Surrey authorities of Runnymede and Elmbridge to the south and east respectively.
22. Spelthorne covers an area of some 5,118ha, 65% of which is designated as Green Belt. The population of the borough at the time of the 2011 census was recorded as 95,598. Most of the population are distributed to the larger centres of Ashford, Shepperton, Staines-upon-Thames and Sunbury, which are also the locations of the largest retail centres in the Borough.
23. Because of its proximity to the River Thames and its tributaries, a significant proportion of the Borough is at risk from a 1 in 100-year flood event. The River Thames forms the entire southern and eastern boundary of the Borough with Runnymede and Elmbridge.
24. Spelthorne is accessible to both the M3 and M25 motorways with junctions at Staines-upon-Thames and Sunbury. The Borough also benefits from 6 rail stations with direct links to London Waterloo, Reading, Weybridge and Windsor.
25. Heathrow airport lies just north of the Borough in the London Borough of Hillingdon and employs over 8% of Spelthorne residents. The Government announced in October 2016 that it would support a third runway at Heathrow Airport. An Airports National Policy Statement (NPS) was subsequently prepared to enable it. The NPS was subject to a successful legal challenge on climate grounds in February 2020. However, in December 2020, the Supreme Court overturned the decision and reinstated the NPS. Any future expansion of the airport will offer opportunities for engagement with the wider area moving forward.

### Methodology

26. This section sets out a nationally compliant approach for preparing the SLAA. The PPG (Housing and Economic Land Availability Assessment) sets out the current Government guidance on preparing an assessment of housing and economic land supply. The SLAA assessment should contain the following:
  - Identification of sites and broad locations with potential for development
  - Assessment of the development potential and suitability of identified sites
  - Assessment of the likelihood of development coming forward (availability and achievability)
27. This updated methodology is based on the Government's recommended approach but interpreted locally. The PPG states that the SLAA assessment should identify all sites regardless of the amount of development needed and that sites with particular policy constraints should be included in the assessment for comprehensiveness. However, constraints must be clearly set out, including where they restrict development, and the assessment should consider what action would be required to remove them.
28. As such, this methodology identifies a set of constraints which are considered to be absolute and some which affect a site's suitability. Absolute constraints are those which cannot be

overcome and where a site can be automatically excluded from further assessment. The list of other constraints is not, nor is it intended to be, exhaustive. Other types of constraints exist, such as those relating to heritage, open space and ecological designations, for example, which will also need to be assessed on a site-by-site basis in terms of how they would affect the suitability or restrict the capacity of a site. These are constraints which could be overcome by mitigation measures in some instances, although this does not imply that policy constraints will change in the future as this will be for the Local Plan process to consider. As such, the identification of an action to remove a policy constraint does not necessarily mean that it will happen.

29. A few other issues are discussed in this SLAA methodology including the approach to student accommodation, housing for older people, permitted development and housing densities. The proposed approaches to these issues are set out later in this methodology.

### **Producing the SLAA**

30. The figure below, taken from the PPG (Housing and Economic Land Availability Assessment) sets out the stages of production of the SLAA. Runnymede and Spelthorne will follow this standardised methodology.

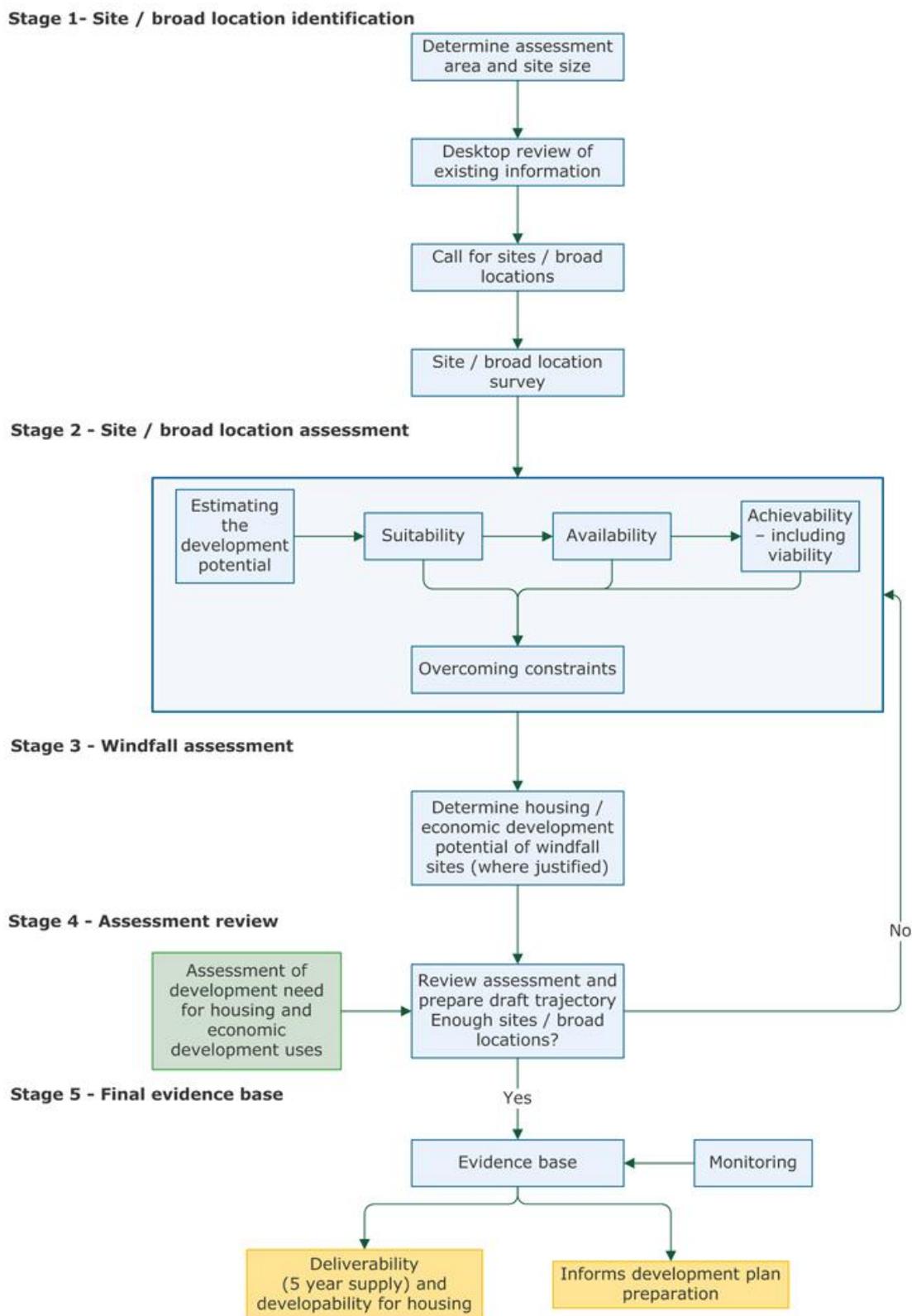


Figure 1: methodology flow chart taken from Planning Practice Guidance- Housing and economic land availability assessment

### Stage 1: Identification of sites and broad locations

31. The SLAA will assess the potential for housing and economic sites. For housing, only sites with a potential development capacity of 5 or more net housing units will be included and for economic sites only those of 500m<sup>2</sup> floorspace or more or site size of 0.25 hectares or more will be included in the assessment. This approach is considered consistent with the PPG.
32. The list of sites considered through each authority's SLAA should not be considered an exhaustive list of sites which will come forward for development in the HMA (although it is anticipated that most sites will come forward via a call for sites exercise). Other sites brought to either Council's attention or sites/opportunities which each authority has identified themselves may also be assessed. If a site is submitted after the close of the call for sites exercise, it will be considered in the following year, although the Council will continue to identify sites themselves throughout the process.
33. The following sets out several sources that can help identify potentially available sites in the borough, the majority of which are suggested by the PPG:
  - Sites submitted as part of previous consultation processes (such as Local Plan Consultation)
  - 5-year housing land supply
  - Valuers' department and/ or other Council departments for Council-owned land
  - Existing housing/economic development allocations
  - Redevelopment/redesign of existing residential/economic areas
  - Sites subject to Section 106 Agreements
  - Planning applications refused, withdrawn or lapsed
  - Unimplemented/outstanding planning permissions for housing
  - Sites with planning permission for housing that are under construction
  - Pre-application discussion that is not considered confidential (and agreed by applicant)
  - Survey of local land agents' listings to consider the suitability of any plots of land for sale, review of redundant offices/commercial land.
  - Ordnance Survey maps and aerial photography
  - Register of public sector land
  - Neighbourhood Plan Forums (Runnymede currently has four Neighbourhood Forums but there aren't currently any in Spelthorne)
  - Data from key statutory bodies (such as the County Council, water companies, Network Rail etc)
  - Vacant and derelict land and buildings and business requirements
  - Development management officer knowledge
  - Engagement with the development industry and Community Planning Panel (Runnymede) and targeted engagement with the community (Spelthorne).
34. In addition to the desktop research to identify sites, call for sites' exercises will also be undertaken. This will also cover sites for gypsies and travellers where necessary.
35. The PPG (Housing and Economic Land Availability Assessment) advises that effective planning for an assessment of land availability must involve cooperation with relevant bodies and key stakeholders in line with the duty to co-operate. Runnymede and Spelthorne previously consulted duty to co-operate parties, the development industry and general stakeholders on a

draft version of the SLAA methodology in September/October 2015. The views expressed during that consultation were considered in updating the methodology.

36. Duty to Cooperate and targeted stakeholders from the community and the development industry were contacted to review the changes proposed to be made in this updated SLAA methodology. In addition, they will continue to be involved throughout the evidence base preparation of the SLAA through the targeted development industry consultations, Community Planning Panel (Runnymede) and targeted consultation with the community (Spelthorne) and, where appropriate, general consultation.
37. Both Councils will contact agents/landowners on their land availability assessment databases and will inform everyone on their policy and strategy consultation databases, alerting them to the call for sites exercise. Information regarding the call for sites will be made available on the respective Council's website. If no response is received from a promoter of a site previously submitted during the call for sites exercise, after two years of the site not being promoted, it will be removed from the SLAA if through previous site assessment it has been determined as not being capable of delivering development. If a site has been assessed as being capable of delivering development in the past, officers will seek to contact the agent or owner again and if necessary, search on the land registry and the site may be included in the latter stages of the Local Plan (years 11-15) until its availability can be determined.
38. The above exercises will help both Councils determine what land is available for development and the sites that are considered deliverable and will form part of the five-year housing land supply (including the supply of traveller sites).
39. It will also need to be checked whether sites previously identified in the five-year supply have been completed and should therefore be removed. It would be necessary for this to be undertaken every year the SLAA is updated. Likewise, if a site had been considered 'developable' (i.e. coming forward in years 6-15) and has since gained planning permission, it should then be included as 'deliverable' as part of the 5-year supply. If a site promoter's site has been developed, then the contact details will be removed from the SLAA consultation database unless they are known to have other land interests in that respective Borough.
40. A thorough assessment of sites will need to be undertaken to assess suitability for other residential uses and employment uses (including mixed-use schemes) as set out in the PPG advice and in paragraph 6 of this SLAA methodology. It is proposed that to do this both councils send a sample of site assessments or site typologies, forming the five-year supply, to be considered as part of a targeted developer consultation exercise. This consultation will need to consider viability issues/concerns relating to these sites as a sense-checking exercise and will both councils to make a more credible and robust analysis.
41. When either Council conducts its call for sites exercise, promoters putting forward a site will be required to provide a certain amount of information to help assist in assessing the site. Appendix 1 shows the type of information that would be expected to be collected in a site proforma for site promoters to complete for each site submitted through the call for sites process.
42. The information provided should assist in carrying out a desk-based review of any submitted site to record the following site information:

- Size of site
  - Boundaries
  - Current use
  - Surrounding land use(s)
  - Character of the area
  - Development progress (if relevant) or an indication of when the site will become available
  - Any physical constraints (such as access)
  - Legal constraints (including ownership issues)
  - International, national and local policy constraints/designations (which will need testing for appropriateness of suggested land use)
  - Initial assessment as to what type and scale of development the site could accommodate
43. Further site assessment will be necessary for sites put forward for consideration, which have a reasonable prospect of forming part of the five-year supply. This approach is consistent with the PPG (Housing and Economic Land Availability Assessment), which states that initial site surveys should be proportionate to the detail needed for a robust appraisal.
44. A site visit may in some instances help officers confirm information gathered through the call for sites and desk assessment, as well as the type and scale of development likely to be appropriate. Site visits can also help assess deliverability by identifying on-site constraints and provide an opportunity to give thought to how potential barriers could be overcome.

#### **Stage 2: Site/broad location assessment**

45. After identifying possible sites, the next stage is to assess each site in detail for its development potential.
46. Assessing a site's potential for development involves four main steps. At all stages, Runnymede and Spelthorne will seek to identify solutions in order to overcome constraints where appropriate to allow sites to be potentially designated for housing/economic land in line with Government guidance.

#### **Step 1: Estimate the development potential of a site**

47. This step involves looking at the constraints (physical, policy and legal) that affect a site in determining the nature/quantum of development that is likely to be acceptable. The policy constraints will be split into absolute (not capable of being overcome/mitigated) and non-absolute constraints which may affect suitability. The approach to absolute constraints and those which may affect suitability are set out in step 2 below.
48. For some of the larger SLAA sites, certain assumptions need to be made for the sites in order to assess their capacity. This has resulted, in some instances, in there being a range of potential housing figures for the site. It is proposed that in these instances, a mid-point in the range is taken until such time as more detailed master planning work is undertaken for that site.

49. For sites in Runnymede this step should be read in conjunction with the Runnymede Traveller Accommodation Assessment (TAA) methodology<sup>2</sup>, which sets out the absolute and non-absolute constraints. These constraints will be reviewed annually and in conjunction with any changes to policy and guidance. Any changes to constraints will be considered in future site assessments. Any assessment of development potential for housing will need to comply with paragraph 68 of the NPPF (if a site is deliverable or developable), and housing densities should reflect local circumstances (as discussed in Step 4 below). Deliverable sites will be determined through consideration of steps 2-4 of stage 2.

### Step 2: Assess the suitability of the site<sup>13</sup>

50. There are several reasons why a site is likely to be considered unsuitable for housing or other forms of development. Constraints that could apply to sites might make all or part of them unsuitable for development. Where sites are considered to be unsuitable either due to an absolute constraint or one which affects suitability, they will be excluded from the five-year housing land supply, unless in the case of non-absolute constraints where it can be demonstrated that the constraint can be overcome, in which case it may be included in the five-year housing land supply.
51. Where the whole of a site is covered by an 'absolute' constraint, the site will not be assessed and will be excluded from the SLAA. Where the whole of the site is covered by a 'constraint affecting suitability', a view will be taken on how detailed the site assessment will be depending on the constraint. Any site not found to be suitable where a 'constraint affecting suitability' could not be overcome now but may be in the future, will not be excluded from the SLAA but may not be included in the calculation of land supply depending on the constraint and/or when it could be overcome.
52. When a site is partly covered by an absolute constraint or partly covered by one which may affect the suitability of the site, the site assessment will need to take account of this and adjust the site's capacity accordingly on a site-by-site basis. An explanation of how a particular constraint has restricted capacity and how it could be overcome could be included in the assessment.
53. The approach to how constraints will be considered when assessing the suitability of sites is set out below.

### Runnymede & Spelthorne Absolute Constraints

#### Flood Zone 3b (Functional Floodplain)

54. The NPPF sets out that inappropriate development in areas at risk of all sources of flooding should be avoided by directing development away from areas at highest risk. The PPG Note *Flood Risk and Coastal Change* sets out which types of developments are inappropriate within different fluvial flood zones based on their vulnerability. All development except for water compatible development or essential infrastructure which has passed the exception test is inappropriate in zone 3b (functional floodplain). As such, any site entirely within flood zone 3b will be excluded from the assessment.

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<sup>2</sup> Runnymede TAA methodology <https://www.runnymede.gov.uk/CHttpHandler.ashx?id=10846&p=0>

55. For sites partially within zone 3b, only the area of the site outside of zone 3b will be assessed, subject to the flood zone constraints as set out in the 'Constraints Affecting Suitability' section of this SLAA.
56. For traveller accommodation, flood zone 3a would be considered an absolute constraint due to the highly vulnerable nature of such accommodation.

#### **Sites of International and National Nature Conservation Importance**

57. Both Runnymede and Spelthorne contain sites which have been designated for their nature conservation importance either at an international or national level. Internationally designated sites include Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites. SPAs are designated for their importance to rare bird species and SACs for rare habitats. Ramsar sites are designated wetland sites which are home to rare species of birds. Nationally designated sites include Sites of Special Scientific Interest (SSSI).
58. Both Spelthorne and Runnymede include areas of the Southwest London Water Bodies SPA and Ramsar which is designated for overwintering bird species of Shoveller and Gadwall. Parts of Runnymede are also within close proximity of the Thames Basin Heaths SPA and Thursley, Ash, Pirbright and Chobham Common SAC, which have been designated because of their heathland habitats and ground nesting bird species Woodlark, Nightjar and Dartford Warbler.
59. Given the high level of protection afforded to international and national sites of nature conservation importance, sites that come forward within these areas will be excluded from the assessment.

#### **Runnymede Absolute Constraints Suitable Alternative Natural Greenspace (SANGs)**

60. The Borough's SANGs have an essential purpose in mitigating against the impact of new residential development on the Thames Basin Heaths Special Protection Area. The Council maintains these areas to a standard specified by Natural England. Development of these sites is likely to diminish their value as SANGs considerably which could impact on their ability to continue to be used for this essential mitigation, which should be secured in perpetuity.

#### **Ancient Woodland**

61. Through the Ancient Woodland Inventory carried out in 2011, several ancient woodland areas in Runnymede have been identified. These areas have a high level of protection and development on such areas should be ruled out unless exceptional circumstances can be demonstrated. This approach aligns with NPPF (paragraph 180) and policy EE9 of the adopted Runnymede 2030 Local Plan.

#### **Spelthorne Absolute Constraints**

##### **Public Safety Zone - Heathrow**

62. Policy EN14 of the Spelthorne Core Strategy seeks to maintain the public safety zone at the west end of the southern runway at Heathrow as defined by the Civil Aviation Authority. The policy sets out that development will be refused which leads to an increase in people living, working or congregating in the Public Safety Zone. Given that the safety zone is unlikely to

change in the foreseeable future, any site identified within the safety zone as defined on the Spelthorne Policies Map will be excluded.

### **Runnymede & Spelthorne Constraints Affecting Suitability**

#### **Green Belt**

63. As already set out, a large proportion of the land across Runnymede and Spelthorne is designated Green Belt and both local and national policy heavily restricts development on such land unless there are very special circumstances to justify a departure from policy. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans, in accordance with paragraph 140 of the NPPF.
64. Whilst both local and national policy severely restricts development within the Green Belt, this is a policy constraint that could be overcome through the preparation of a Local Plan, and as such is not an absolute constraint for the purposes of the SLAA. However, a distinction needs to be made between how sites which are previously developed and those that are undeveloped are assessed in the SLAA.
65. In accordance with NPPF paragraph 149, previously developed<sup>3</sup> sites in the Green Belt are capable of contributing to development needs through limited infilling or the partial or complete redevelopment of such sites and are considered suitable for the purposes of this SLAA methodology. As such, a detailed assessment of sites in the Green Belt that are previously developed will be undertaken.
66. Where part of a site in the Green Belt is previously developed and the other part is not, only the area of the site considered to be 'previously developed' will be considered as suitable in the first instance. This will be determined on a case-by-case basis. Sites in the Green Belt that don't contain previously developed land will be subject to a two-stage assessment approach. This will involve the following:

Stage 1: initially in the first iteration of the SLAA, sites in the Green Belt, which do not meet the definition of previously developed land, will not be considered suitable for development and will only be subject to a limited assessment. The purpose of this staged approach is to maximise the supply of previously developed land in the first instance.

Stage 2: If the Council takes the decision to explore the potential for Green Belt releases through its Local Plan in order to meet the development needs of the Borough, then a further iteration of the SLAA will be undertaken, in keeping with the cyclical approach to undertaking SLAAs set out in the flowchart in the PPG. This will involve carrying out more detailed assessments of the sites identified through the Council's site selection work as being preferential locations for growth following the consideration of their sustainability credentials and Green Belt performance.

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<sup>3</sup> As defined in annex 2 of the NPPF.

### **Garden centres**

67. A consistent approach is needed to assessing the potential of garden centres for development. As a result, it is proposed that unless there is an established lawful use for the site of retail/residential etc by way of a Certificate of Lawfulness that the site will be treated as being in a horticultural use and, as such, will not be considered to be previously developed land for the purposes of the SLAA.

### **Flood Risk**

68. Whilst flood zone 3b is an absolute constraint to development, sites within other lower risk flood zones can be considered suitable based on their vulnerability. As highlighted above, a significant proportion of land in Runnymede and Spelthorne is at risk from fluvial flooding.
69. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere (NPPF para. 159). Sites identified as being at risk from any source of flooding (whether this be fluvial, groundwater, reservoir or surface water flooding) will only be considered suitable where it can be clearly demonstrated that the development can be made safe for its lifetime without increasing flood risk elsewhere.
70. Generally, in Runnymede, sites in flood zone 3a or which are found to be at risk from other sources of flooding will not be included within the 'deliverable' housing supply unless they have planning permission (and as such have demonstrated through this rigorous assessment process which includes consultation with statutory and other relevant consultees, that they can be made safe for their lifetime without increasing flood risk elsewhere). However, such sites could be included within the 'developable' supply i.e. from year 6 onwards, provided that the landowner undertakes suitable flood risk assessment and mitigation measures through the planning application process.
71. In relation to other sources of flooding, whilst this will need to be examined at the planning application stage, for the purposes of the SLAA, it is considered that it will not be possible to provide an in-depth analysis for individual sites. Below is a summary of the other sources of flooding identified by the Council in its level 1 Strategic Flood Risk Assessment (SFRA), a summary of the datasets that the Council has access to, and confirmation as to how each source will be considered in the SLAA. It should be noted that these other sources of flooding will only be considered in Runnymede in its stage 2 SLAA once its 2018 Strategic Flood Risk Assessment has been updated:

– Surface water flooding: Surface water flooding occurs when rainfall intensity is greater than the infiltration rate of the soil resulting in overland sheet flow. Flooding from surface water sewers can also be caused, and is influenced by, the capacity and condition of the surface drainage network, and rates of surface runoff are influenced by rainfall and extent of impermeable area. The Environment Agency's 'Risk of Flooding from Surface Water' mapping has been produced on behalf of the Government, using information and input from Lead Local Flood Authorities. The Risk of flooding from surface water: Understanding and using the map

document<sup>4</sup> which is published alongside the mapping confirms that, 'The map does not contain sufficient information for it to be used to determine flood risk to individual properties' and instead gives an indication of whether an area may be affected by surface water flooding and to what extent. For this reason, for the purpose of the SLAA, it will be confirmed whether a site is shown to be in an area of risk, but sites affected by this type of flood risk will still be capable of being included within years 1-5.

- Sewer flooding: Climate change, population growth, and the paving over of green spaces that provide natural drainage are stated by Thames Water as being factors that are putting increasing pressure on the sewerage network, particularly after heavy rain. Thames Water provides the Councils with extracts from their DG5 Flood Register. Due to data protection requirements the data is not provided at individual property level; rather the register comprises the number of properties within 4-digit postcode areas that have experienced sewer flooding either internally or externally within the last 10 years. It should be noted that records only appear on the DG5 register where they have been reported to Thames Water, and as such they may not include all instances of sewer flooding. Given the relatively high-level nature of this data set and given that potentially the data is incomplete, for the purpose of the SLAA, whilst the data will be commented on, the data will not be used as a determining factor in deciding whether a site is deliverable or developable.

- Groundwater flooding: Flooding from groundwater can happen when the level of water within the rock or soil that makes up the land (known as the water table) rises. The water table in the drift deposits are a reflection of river levels, therefore the risk of groundwater flooding generally occurs in this part of the County when there is also a risk of flooding from the Thames. The BGS Susceptibility to Groundwater Flooding dataset shows where groundwater flooding could occur (defined by the term susceptibility) but does not indicate risk, which is the likelihood that it will occur. Given the limitations of the dataset, for the purpose of the SLAA it will be confirmed whether a site is shown to be in an area which is susceptible to this type of flooding, but this dataset will not be used as a determining factor in deciding whether a site is deliverable or developable.

- Flooding from reservoirs: A number of reservoirs are located within and adjacent to the Boroughs of Runnymede and Spelthorne. Such bodies of water have the potential to cause flooding in both Boroughs. The Environment Agency publishes mapping which shows the maximum extent of reservoir flooding however the information published alongside the dataset confirms that since the mapping seeks to predict a credible worst-case scenario, it's unlikely that any actual flood would be this large. This data is intended for emergency planning only and is not reliable for large scale flood risk assessments. Given the limitations of the dataset, for the purpose of the SLAA, whilst the data will be commented on, it will not be used as a determining factor in deciding whether a site is deliverable or developable.

- Flooding from canals and other artificial sources: As with reservoirs, the flood risks from canals and raised water bodies are considered to be residual. The flood mechanisms identified from canals are breaching and overtopping. The control of flow in canals via weirs and gates means that the levels should not be overtopped from a fluvial flood event. There remains, however, a residual risk that flood water could be conveyed down the canal should the appropriate

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<sup>4</sup> [Flood risk maps for surface water: how to use the map - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/442222/flood_risk_maps_for_surface_water_how_to_use_the_map.pdf)

measures fail. At locations where embankments are perched there lies a residual risk of breaching, however the probability of a breach is very small as there is a regime of regular maintenance and inspections. There is no mapping that shows flood risk from canals and other sources that either Local Authority is aware of. As such, this type of flooding will not be reported in the SLAA.

-Tidal flooding: There is no risk of tidal flooding occurring in Runnymede or Spelthorne Boroughs.

72. In Spelthorne, sites in flood zone 3a can be included in the 'deliverable' supply i.e. years 1-5, so long as it can be demonstrated that flood risk can be overcome. This particularly relates to sites that have progressed within the planning system or have had detailed pre-application discussions, with detailed evidence available to support the position. Sites will otherwise be included in the 'developable' supply. Sites and the wider risk of flooding in Spelthorne will be assessed in further detail through the Spelthorne Strategic Flood Risk Assessment Stage 2 which will be published alongside the draft Local Plan. This will consider the risk of all sources of flooding in the Borough and consider opportunities for flood management

#### **River Thames Scheme (Datchet to Teddington) Safeguarding Areas**

73. The River Thames Scheme is a proposed major infrastructure project that will reduce flood risk between Datchet and Teddington. Part of the Scheme consists of major engineering works to construct three new flood channels between 30-60m wide and totalling 17km in length.
74. As part of the Scheme, the Environment Agency has identified areas within Runnymede and Spelthorne as the preferred locations for two of the flood channels. Whilst the exact location of the flood channels has not yet been determined, the EA has indicated broad areas which should be safeguarded.
75. As such, any site put forward within proposed safeguarded areas for the River Thames Scheme will not at this stage be considered suitable, although it will be acknowledged that the constraint could be overcome once details of the final scheme are known. Therefore, for comprehensiveness, sites in the safeguarding area will not be excluded from the assessment.

#### **Waste and Minerals sites**

76. Surrey County Council is the Local Planning Authority for waste and minerals. Paragraph 210 of the NPPF requires LPAs to:

*'safeguard mineral resources by defining Mineral Safeguarding Areas; and adopt appropriate policies so that known locations of specific mineral resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that resources defined will be worked);'*

77. Further, paragraph 8 of the National Planning Policy for Waste (NPPW) states:

*'When determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that the likely impact of proposed, non-waste related development on existing waste management facilities, and on sites and areas allocated for waste management, is acceptable and does*

*not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities...'*

78. Whilst safeguarded sites or allocations for minerals and waste are not absolute constraints, Runnymede and Spelthorne will discuss with the County Council any assessment of sites submitted to the SLAA which fall within a mineral safeguarding area or may impact on both existing and allocated minerals and waste sites and infrastructure used for minerals development. Where a site is identified within an existing allocation for minerals or waste development (including aggregates recycling), the site will not normally be found suitable for housing or economic development, however for comprehensiveness it will not be excluded from the assessment.
79. The local context for defining mineral safeguarding areas, allocated and existing sites for minerals and waste development and safeguarding infrastructure for minerals development can be found in policy MC6 of the Surrey Minerals Plan Core Strategy (2011)<sup>5</sup> and policy 7 of the Surrey Waste Local Plan 2019-2033<sup>6</sup>.
80. In addition, regard to the Surrey Minerals Plan 2011: Minerals Site Restoration Supplementary Planning Document (July 2011) will also need to be had for the most up to date position on preferred after uses and current best practice in restoration techniques. Surrey County Council has produced a protocol<sup>7</sup> for boroughs/districts when consulting the County on minerals and waste sites, which also provides some useful background information, including the allocated sites in Runnymede and Spelthorne.

### **Agricultural land**

81. Footnote 58 to paragraph 175 of the NPPF states that 'Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.'
82. Consistent with this national policy approach, both authorities will seek to protect those agricultural sites that are of the best quality. This exercise has already been undertaken in Runnymede as part of the Green Belt Review. Therefore, when sites are submitted to the SLAA, any assessment made will need to consider the site's agricultural value in order to safeguard the best quality sites, as it would be highly unlikely that these sites would be considered for development. As such, sites on land designated as the best quality for agriculture will not be considered suitable but will be included in the assessment for comprehensiveness.

### **Runnymede Specific Constraints Affecting Suitability – Thames Basin Heaths SPA 400m Buffer**

83. As stated elsewhere in this methodology, sites of international or national conservation importance are considered to be absolute constraints. However, there is also a general constraint against any net additional dwellings within 400m of the Thames Basin Heaths SPA

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<sup>5</sup> Surrey Minerals Plan Core Strategy (2011). Available at: <http://www.surreycc.gov.uk/environment-housing-and-planning/minerals-and-waste-policies-and-plans/surrey-minerals-plan-core-strategy-development-plan-document>

<sup>6</sup> Surrey Waste Plan (2020). Available at: [Surrey Waste Local Plan 2019-2033 - Surrey County Council \(surreycc.gov.uk\)](http://www.surreycc.gov.uk/data/assets/pdf_file/0020/19145/Consultation-Protocol-Jun-19.pdf)

<sup>7</sup> Surrey Planning Officers Association (SPOA) Minerals and Waste Safeguarding Agreed protocol for District/Borough consultation with Surrey County Council (January 2014) [http://www.surreycc.gov.uk/data/assets/pdf\\_file/0020/19145/Consultation-Protocol-Jun-19.pdf](http://www.surreycc.gov.uk/data/assets/pdf_file/0020/19145/Consultation-Protocol-Jun-19.pdf)

due to recreational and urbanising impacts. As such, residential sites proposing net additional dwellings within 400m of the Thames Basin Heaths SPA will be considered unsuitable, but not excluded as on very rare occasions, development within 400m has been found to be acceptable. Sites for economic purposes and C2 uses with high dependency residents may be considered suitable within the 400m buffer.

### **Biodiversity Buffer Zone**

84. The Environment Agency requires a minimum 8m buffer zone around all rivers, mainly for biodiversity reasons but also to gain access for maintenance purposes. The 8m buffer should be without structures, hard standing (including car parks), formal footpaths, fences, overhanging development such as balconies and should not include formal landscaping.
85. As such, any site submitted to the SLAA which has land within or on an 8m buffer of a river, will not have that part of the site considered as suitable for development and an allowance will be made in the site's capacity.

### **Conservation Areas**

86. Runnymede has seven and Spelthorne has eight designated areas of special architectural or historic interest that are protected with conservation area status. The Planning (Listed Buildings and Conservation Area) Act 1990 allows LPAs to designate such areas. Whilst development is not precluded in Runnymede or Spelthorne's conservation areas, it is unlikely that there would be significant development opportunities.

### **Public open space**

87. Runnymede published an Open Space Study (OSS) in 2017 whilst the Spelthorne Open Space Assessment was published in 2019. Spaces identified in these studies should be considered a significant constraint to development unless it is demonstrated that the land is surplus to requirement, or the provision could be replaced (NPPF paragraph 99).

### **Spelthorne Specific Constraints Affecting Suitability**

#### **Heathrow Airport Noise Contours**

88. Policy EN11 of the Spelthorne Core Strategy seeks to deal with the noise impact of Heathrow. The Policy seeks to refuse the development of new residential development where aircraft noise levels are at or exceed 66Leq. The 66Leq noise contour is shown on the Spelthorne Policies Map. As such, any site identified for net additional dwellings within or on the 66Leq noise contour will not be considered suitable. If a third runway at Heathrow Airport is implemented, this is likely to change the noise contours around the airport. Depending on the details of any noise mitigation proposed this could widen or narrow the contours around the airport. As such, any changes to the noise contours around the airport will need to be considered in future iterations of the SLAA when these occur and as such, sites within or on the 66Leq contour will not be excluded.
89. Policy EE2 of Runnymede's 2030 Local Plan sets out that development proposals resulting in or being subject to external noise impacts above Significant Observed Adverse Effect Level will not

be supported unless it can be demonstrated that the social and economic benefits of the proposal outweigh noise impacts and unless the scheme's design and layout has been optimised to avoid, mitigate and reduce impacts to a minimum. However, Policy EE2 is not a constraint to all development and therefore does not affect the suitability of a site.

### **Other Considerations Affecting Suitability or Capacity**

90. Other considerations which may affect the suitability or capacity of a site in part or in whole in either the Runnymede or Spelthorne SLAA include physical and other environmental constraints. This could include (but is not limited to) site access and visibility, presence of utility infrastructure, contaminated land or neighbouring amenity. As these constraints are likely to be different for each site, they will be considered on a site-by-site basis and treated in accordance with saved policies in the adopted Runnymede 2030 Local Plan or Spelthorne Core Strategy & Policies DPD 2009 and saved policies from the 2001 Local Plan. Compliance with national policy contained in the NPPF will also be considered.

### **Step 3: Is the site available?**

91. The proforma to be submitted with a site will help establish its availability. It will help highlight ownership and other legal issues that may need considering. In addition, the proforma will help identify if the site is currently available or will be in the longer term. If there is anything preventing the site from being available, it will need to be established if there is any action that could be taken to address the barriers to development.
92. The PPG (Housing and Economic Land Availability Assessment) advises that '*consideration can also be given to the delivery record of the developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions*' (PPG, Housing and Economic Land Availability Assessment: stage 2 ([paragraph 19])). It is also worth noting that although a site may have an extant planning permission, it does not necessarily guarantee the site is available as a party can make a planning application on a site even if they do not own it. Such factors will be considered on a site-by-site basis.
93. Where either authority identifies a site or opportunity which it considers could come forward or has potential, that authority will undertake land registry searches and write to the owners regarding site ownership and availability. If an owner indicates that they have no intention of releasing a site/land for other uses, then the site will not be included in the assessment. If a site owner indicates that the site could be developed now or at some point in the future, then the site will be assessed against the methodology criteria.

### **Step 4: Is the site achievable?**

94. A site is considered achievable for development where there is a reasonable prospect that it will be developed at a particular point in time. To determine achievability, it is necessary to test whether a site is economically viable. This can be a difficult test to undertake at this stage if the quantum of development is unknown, although officers will make an estimation of development potential.
95. When estimating a site's potential, regard will need to be had to the latest Runnymede and Spelthorne Strategic Housing Market Assessment (SHMA) in terms of the size and type of dwellings which should be delivered on a site. Regard will also need to be had to the approach to density and accessibility, as set out below, and to any open space/playing space

requirements.

96. Where assumptions of site yield made by officers' match those of the owner/agent, the site would be assumed to be achievable, but where there is conflict, officers should attempt to obtain information from the landowner/agent on whether the sites would still prove developable at lower yields or for different uses.
97. It is hoped that targeted consultations with developers/ landowners etc will be able to assist officers in determining a realistic view of viability for a number of uses, dependent on what a given site is capable of delivering.
98. All sites put forward for development which have been identified as suitable and achievable will be visited and scoped for their suitability and development potential. Runnymede's allocated housing sites that have not yet gained planning permission and Spelthorne's undeveloped allocations will also be re-visited to check for any changes in circumstances on site if required.
99. The final SLAA report should also include a site book showing maps of each of the SLAA sites together with a completed officer site assessment form completed in accordance with the above steps (containing the type of information set out in Appendix 1 to this report).

#### **Housing Densities & Accessibility**

100. The PPG says that LPAs can include locally determined policies on density but that when assessing development potential, plan makers should seek to make the most efficient use of land (paragraph 16).
101. The adopted Runnymede 2030 Local Plan doesn't prescribe a set density for developments but instead sets out, in Policy EE1: Townscape and Landscape Quality, that all development proposals need to achieve high quality and inclusive design which responds to the local context while making efficient use of land.
102. Spelthorne has an adopted policy (Policy HO5) on housing densities in its Core Strategy & Development Policies DPD (2009) with densities ranging from 35-55 dph in areas predominated by family housing and up to 75 dph or above in Staines Town Centre. The Spelthorne SLAA will assess sites submitted as part of the call for sites in accordance with policy HO5, or where character permits, densities may be increased accordingly; however, as for Runnymede, density will be considered on a site-by-site basis and the policy will be used as a minimum.
103. Certain locations in both Runnymede and Spelthorne will be highly accessible to a range of public transport options or to areas benefitting from key services and employment opportunities. These areas, such as town centre locations, should be considered for higher density developments. As such, both authorities will seek to take advantage of the sustainability credentials of such areas and take account of the accessibility of sites to public transport and key services/employment opportunities when assessing site densities.
104. For previously developed sites in the Green Belt, the density will be governed by the need to comply with paragraph 149 g) of the NPPF, which states that limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings) will be acceptable if it would not have a greater impact on the openness of the Green Belt than the existing development or where the re-use of previously developed land would contribute to meeting an identified affordable

housing need. As such, a suitable density on these sites will need to be considered on a case-by-case basis, as will be the case for any rural exception sites.

105. As such, SLAA densities will need to be assessed on a site-by-site basis to consider where higher densities can be achieved. However, most SLAA sites will assume a minimum housing density of 30 dph as a starting point.

### **Air Quality**

106. Runnymede currently has two Air Quality Management Areas (AQMA) in place; one along the M25 at Junction 11 and one at Addlestone Town Centre. Spelthorne has a single AQMA in place, which covers the whole of the Borough and was designated for exceedance of NO<sub>x</sub> in certain areas of the Borough.
107. Any sites put forward for consideration in the AQMAs will need to be considered in line with the requirements of paragraph 186 of the NPPF and should have regard to Runnymede's Air Quality Action Plan and Spelthorne's Air Quality Action Plan<sup>8</sup>.

### **Stage 3: Windfall assessment (for residential development)**

108. Windfalls are sites not specifically identified in the development plan. They are usually small-scale sites that are first encountered as development sites when a planning application / prior approval application is submitted.
109. The supply calculation in the housing trajectory for both authority areas will include an allowance for windfalls in the five-year housing land supply as Runnymede and Spelthorne can demonstrate that windfall development has consistently formed a significant part of the housing supply and is likely to continue to do so. This is evident through analysing the previous SHLAAs and looking at historic windfall delivery rates.

### **Runnymede**

110. The windfall figure will be derived from averaging housing delivery from sites over the preceding 5 or more years. To date, Runnymede has not seen a significant fluctuation in the amount of windfall sites coming forward in recent years, and there is no evidence to suggest a downward trend, despite difficult current national economic circumstances. To avoid double counting, windfall sites will be included in the housing trajectory from year 4 onwards.

### **Spelthorne**

111. Spelthorne's windfall calculation is based on the average completion of sites of 4 units or less over the past 7 years. This average figure is included within the housing trajectory. In order to avoid double counting, sites with planning permission will not be considered in the SLAA and instead a small sites allowance will be factored into the calculation of supply.

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<sup>8</sup> Spelthorne Air Quality Action Plan, 2005 <https://www.spelthorne.gov.uk/article/2108/Air-quality---latest-reports>

### Sites without planning permission

112. When assessing land availability, it is deemed appropriate to apply an under-delivery discount adjustment to sites that do not have an extant planning permission, to identify a realistic five-year housing land supply in the housing trajectory. This approach has been recognised as good practice by the Planning Inspectorate in order to ensure a robust methodology<sup>9</sup>. The exact 'discount' to apply to residential development delivery will be determined using up-to-date data for each authority and will be set out in the SLAA report itself.

### Permitted Development (PD)

113. Since May 2013, developers have been given the right to seek permission to convert certain commercial properties – primarily offices, light industrial units and small shops – to homes through a light-touch 'prior approval' process.

114. More recently, the Government made significant changes to town centre use classes, that came into effect from the start of September 2020. Those changes saw a whole host of uses – primarily offices, restaurants and shops, professional services and light industrial combined into one all-encompassing new category, class E.

115. The Government is currently introducing legislation for England, to come into effect from 1<sup>st</sup> August 2021, to allow buildings under the new class E use class to convert to residential use (class C3) without the need for applicants to submit a planning application. Buildings with over 1,500 square metres of floorspace will be exempt from the new rules. The new right will include a vacancy requirement that will ensure the building changing use has been vacant for three months before the date of the application. In addition, the building must have been in commercial business and service use [class E] for two years before benefiting from the right.

116. There will be limited opportunities for local consideration by the local planning authority of specific planning matters through the prior approval process. These considerations include:

- Flooding
- Impacts of noise from commercial premises
- Provision of adequate natural light to all habitable rooms
- In conservation areas only - consideration of the impact of the loss of the ground floor commercial, business and service use
- Impact of the loss of health centres and registered nurseries on the provision of such local services.

117. Permitted development rights have had a significant impact in both boroughs since they were first introduced in May 2013. Not all of these prior approvals will necessarily be implemented, as some are likely to be speculative i.e. to see what value could be gained from the building if it were to be converted. However, recent research undertaken by the Bartlett School of Planning, placed Runnymede 14<sup>th</sup> in local planning authorities in England (with 26.3% of net housing additions from PDR conversions 2019/20) and Spelthorne was ranked 8<sup>th</sup> in the same survey

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<sup>9</sup> An example is Elmbridge Borough Council implemented policy CS2: *Housing provision, location and distribution* in their Core Strategy, which utilised a 15% contingency that was applied to unimplemented planning permissions to take account of uncertainties in delivering housing in the economic climate. An Inspector found the Core Strategy sound and the Council adopted it in July 2011. There are several other LPAs that have also implemented an under-delivery discount to housing delivery in their trajectories

(with 33.8%). These figures suggest that PD conversions are having a significant impact in both Boroughs.

118. However, in September 2020 the Government agreed to make space standards mandatory for all homes in England built under permitted development rights. This means that from 6<sup>th</sup> April 2021 all permitted development homes will have to comply with the government's nationally prescribed space standards. This could well result in a reduction in the number of PD conversions taking place in the future, as it will become less advantageous for developers to make these conversions.

119. Nonetheless, PD conversions are likely to have a significant impact on increasing the delivery of housing sites in both Boroughs and as a result both housing trajectories will need to factor in this source of supply.

### **Student accommodation and accommodation for older people**

120. Runnymede contains a high population of students who attend the Royal Holloway University of London (RHUL), an internationally recognised university located in the north of Runnymede Borough. The University has purpose-built accommodation for students both on and off campus.

121. In accordance with the PPG (Housing Supply and Delivery), the contribution arising from purpose-built student accommodation needs to be taken into account in the Runnymede BC housing trajectory.

122 The PPG (Housing Supply and Delivery) sets out that all student accommodation can in principle count towards an authority's housing land supply. In assessing the amount of market housing that may be released by purpose-built student accommodation, officers at RBC have considered the:

- Amount of accommodation that new student housing releases in the wider housing market (by allowing existing properties to return to general residential housing); and/or
- The extent to which it allows general market housing to remain in such use, rather than being converted to student accommodation.

123 This approach will need to be applied to both communal establishments for students and to multi-bedroom self-contained student flats. The PPG sets out that authorities will need to base their calculations on census data and, consequently this approach will be used in the SLAA.

124 As with student accommodation and in accordance with the PPG (Housing Supply & Delivery), the amount that purpose-built housing for older people can contribute to the five-year supply should be determined. As such, residential institutions within Use Class C2 will need to be considered and a figure of how much market housing is likely to be released by purpose-built older people's accommodation should be determined when producing the housing trajectory, based on data taken from the most recent Census.

### **Conclusions on site assessments**

125 Detailed site assessments will not be undertaken for new sites regarding achievability and deliverability that have not been deemed 'suitable' and 'available' in earlier stages of the site

assessment process. However, in subsequent years, if a site that had previously not been assessed in detail later met the suitable and available criteria; a more detailed assessment would then be undertaken at such a time.

126 When considering the viability of sites both authorities will, to add robustness to the SLAA process, cross-reference information provided by the site promoter and a selection of sites or site typologies appraised by targeted engagement with the development industry, as well as any evidence of viability through Community Infrastructure Levy (CIL) charging schedule preparation. These targeted consultations will include developers, those with land interests; land promoters; local property agents and registered providers.

127 It should be noted that the purpose of these consultations is not for these parties to play a decision-making role and neither will it be an opportunity for parties to advance their own interests. Decisions regarding which sites might be allocated for development will be a matter for each authority's Local Plan process not this group of bodies or the SLAA itself. Neither should it be construed that a site in the SLAA would necessarily be granted planning permission. As such, the SLAA acts as an audit of sites which could be brought forward for development but does not indicate whether a site would be allocated, or that planning permission would be granted. The purpose of each panel is to advise each Council on the technical aspects of the SLAA methodology and seek confirmation of viability assumptions on a selection of SLAA sites or site typologies each year.

#### Stage 4: Assessment review

128 Once the sites and broad locations have been assessed, the development potential of all sites can be collected to produce an indicative trajectory. This should set out how much housing and the amount of economic development that can be provided, and at what point in the future (i.e. within years 1 to 5, 6 to 10, and 11 and beyond). An overall risk assessment should be included setting out whether sites will come forward as anticipated.

129 Local Housing Need (LHN) is an up-to-date assessment of housing need calculated in accordance with the Government's standard method. The assessment of deliverable sites i.e. those expected to come forward in the first five years can then be compared to the Local Housing Need (LHN) to help each authority to assess whether there is a five-year housing land supply.

130 If it is considered that a shortfall exists between the LHN and the housing land supply, the assessment will firstly need to be revisited to see whether further sites can be found or changing assumptions about the development potential of particular sites will increase the supply. If there is still insufficient supply, the PPG (Housing and Economic Land Availability Assessment) advises in respect of housing that it may be necessary to plan how this shortfall should best be managed.

131 In terms of economic land, even though there is no requirement to identify a five-year supply of sites for economic uses, the SLAA will help identify potential sites in either Borough which may be suitable for such uses. This information will assist when either Council is working with the other Local Authorities identified as being located within an FEA with Runnymede and/or Spelthorne to consider which sites across the wider FEA may be the most suitable to meet identified economic needs.

132 Any shortfall between housing and economic targets and the five-year supply of land will trigger the Council to undertake a potential number of steps to address the shortfall, which are as follows:

- Sites that have not been assessed in detail should be re-examined to establish whether they can be reconsidered dependent on, for example, the outcome of discussion with the landowner/agent on how they could overcome identified non-absolute constraints
- Reconsider density and suitability assumptions
- Investigate other housing and planning policy options that have the potential to increase the delivery of housing, for example consider the release of designated employment sites
- Investigate smaller sites than that set out in the PPG
- Broad locations for development may need to be re-considered, dependent on the evidence the Councils have collected.
- Only should the above steps fail to address the shortfall, both Councils continue discussions with neighbouring Authorities, in particular those within the FEA and HMA in the first instance, as to whether they can meet any identified shortfalls.

#### Stage 5: Final evidence base

134 Both Councils will produce a housing trajectory once a year (unless any material changes occur, and it is necessary to update the trajectory to assist decision-making on major planning applications) that will illustrate the distribution of sites for different types of residential uses during the set year periods. This will be a snapshot as at 31<sup>st</sup> March. By the time of publication, the deliverability and yield of some sites may vary.

135 Each Council's final SLAA will consist of two documents:

- A **Report**, which details the SLAA assessment background, methodology and conclusions
- A **Sitebook**, showing each site to scale and including various physical constraints and officer assessment of the developable and deliverable nature of the site, including the type and estimated quantity of development. The Sitebook may be broken down into separate sections/documents to reflect different site typologies, sizes and phasing.

136 A draft report will be published for key stakeholders to review individual sites, prior to either Council finalising their study. This will include all Councils within the Council's HMA and FEA.

137 The assessment will be published on either Council's website to ensure it is publicly available.

138 The SLAA evidence will inform any necessary Duty to Cooperate discussions regarding identifying land to meet the development needs of Runnymede and Spelthorne over the Plan period.

139 The conclusions of each Council's SLAA assessment will also be used in conjunction with other evidence to inform their emerging Local Plans, including whether there are sufficient sites to meet both boroughs' needs. Each Council's Local Plan will undergo full consultation and independent examination before any decisions are made on site allocations.

140 Each Council's SLAA will be updated annually (or sooner should significant new evidence be identified to justify an early revision of the evidence) in line with the PPG until such a time that

sites have been allocated in either Council's adopted Local Plan. This would need to be kept under review as part of the monitoring of either Local Plan.

## Appendices

### Appendix 1: Example of a Proforma

#### Site Assessment Pro- forma

Pro-forma, similar to the one outlined below, should be used to help to identify potential housing and economic sites in the SLAA. Suggested sites should be able to accommodate at least 5 or more net dwellings, one traveller pitch/plot or accommodation for older people or students, or in the case of economic land, sites should be 0.25ha or greater in size (or have capacity for 500m<sup>2</sup> of floor space) with the view for development occurring by YEAR XXX.

**A separate form should be filled in for each site and include a site plan clearly showing the boundaries of each site.**

Sites that have been submitted previously should include the site ID (if known) and details of any changes since the previous SLAA was published. A map of the site should also be submitted showing site boundaries (or amendments to an existing site boundary if previously submitted).

All information provided may be made public apart from private email addresses and telephone numbers.

Completed forms and site location maps must be received by the Council no later than xxxx:

Your Details			
Name			
Organisation (optional)			
Address			
Postcode		Telephone number(s)	
E-mail address			
Landowner (please provide contact details)			
Please indicate in what capacity you are submitting the site details	Owner <input type="checkbox"/> Agent <input type="checkbox"/> 3rd party <input type="checkbox"/>	Contact details:	

Site Details			
Address			
Postcode		Site Area (Hectares)	
Brief description of site			
Current Land Use			
Site previously submitted to SLAA?		SLAA ID (if applicable):	
Location			
Please tick one as appropriate	Previously developed land <sup>10</sup>	Not previously developed	
Green Belt			
Surrounding Details			
Land Uses			
Character of Surrounding Area			
Constraints			
Policy Constraints (if known)			
Physical (access, steep slopes, potential flooding, location of pylons, protected trees, contaminated land, listed buildings etc.)			
Legal			

<sup>10</sup> Defined in Annex 2 of the National Planning Policy Framework 2021

<b>Land ownership</b>	
<b>Other</b>	
<b>What would be required to overcome the constraints identified that currently prohibit development on the site?</b>	
<b>Proposed Development</b>	
<b>Is the site currently in the planning process?</b>	<p>The site has not been involved in the planning process <input type="checkbox"/></p> <p>There have been pre-application discussions about the site <input type="checkbox"/></p> <p>The site has a current or expired outline permission <input type="checkbox"/> (please include application number if known) prefixed RU.</p> <p>The site has a current or expired full permission <input type="checkbox"/> (please include application number if known) prefixed RU.</p>
<b>Is the site available now? If not, when is it expected to be available?</b>	
<b>Number of proposed Houses / Units</b>	
<b>Number of Houses / Units to be demolished</b>	
<b>Expected density (Dwellings per hectare)</b>	
<b>Indicative housing mix</b>	
<b>Would you consider making the site available for other residential uses (traveller site, student accommodation, accommodation for older people, self-build)?</b>	<p>If yes, please state which other residential uses you would consider making the site available for</p>

<b>Would you consider making the site available for other uses (for example, economic, retail, leisure)?</b>	<b>Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, please state which other uses you would consider making the site available for</b>
<b>Over what broad timeframe do you anticipate that the site could be developed? If in years 1-5, information should be provided to support the likely timeframe</b>	<b>Within next 1-5 years <input type="checkbox"/> Within next 6-10 years <input type="checkbox"/> Within next 11-15 years <input type="checkbox"/> Beyond 15 years <input type="checkbox"/></b>
<b>Other information</b>	
<b>Viability (has any financial appraisal been undertaken and what are the outcomes)</b>	
<b>Is there any other information you feel is relevant?</b>	
<b>Please also include a copy of the site plan with boundaries clearly shown with your completed form whether by post or email.</b>	

**Disclaimer:**

The SLAA is a key part of the evidence base that will be used to inform either Council's future Local Plan but does not in itself constitute planning policy. It is important to note that the SLAA does not formally allocate sites for development and the identification of a site in this document as having the potential for housing will not prejudice the determination of any subsequent planning application for that site nor does it influence the Council towards the favourable consideration of any future planning applications for the development of that site.

Any comments made in relation to a particular site does not constitute a planning brief or formal planning advice.

All proposals for housing development arising during the plan period will be considered on their individual merits in relation to adopted and emerging development plan policies and other material considerations relevant at the time of determination.

The Councils accept no liability for any costs, liabilities or losses arising because of the use of, or reliance upon, the contents of the SLAA.