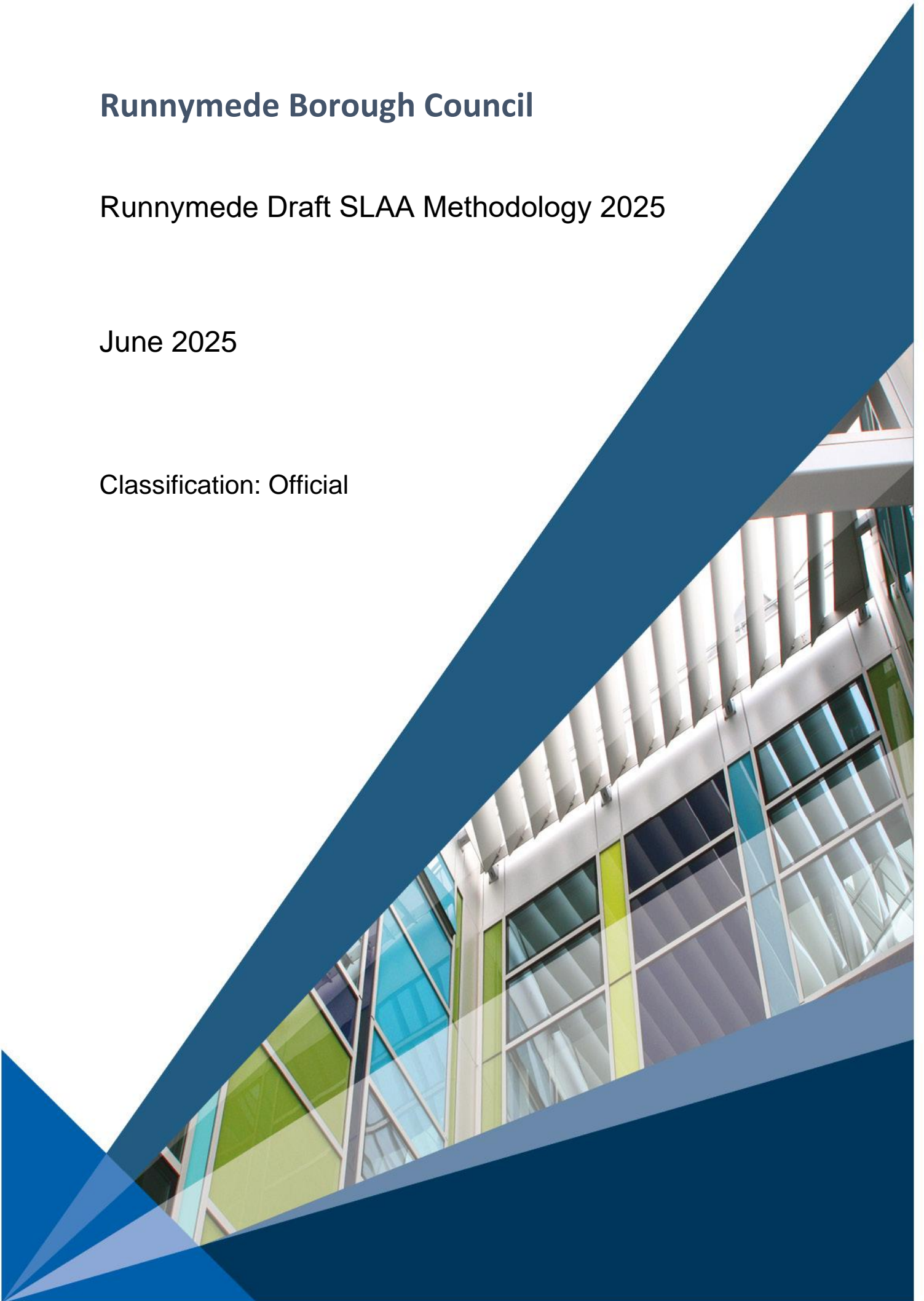


Runnymede Borough Council

Runnymede Draft SLAA Methodology 2025

June 2025

Classification: Official



Contents

| | |
|---|----|
| Background | 2 |
| Runnymede Borough Council: Spatial portrait | 4 |
| Spelthorne Borough Council: Spatial portrait | 4 |
| SLAA Methodology | 6 |
| Producing the SLAA | 6 |
| Stage 1: Identification of sites and broad locations | 8 |
| Stage 2: Site / broad location assessment | 11 |
| Step 1: Estimate the development potential of a site | 11 |
| Step 2: Assess the suitability of the site | 11 |
| Step 3: Is the site available? | 19 |
| Step 4: Is the site achievable? | 19 |
| Stage 3: Windfall assessment (for residential development) | 22 |
| Sites without planning permission | 22 |
| Permitted Development (PD) | 23 |
| Student accommodation and accommodation for older people | 24 |
| Stage 4: Assessment review | 25 |
| Stage 5: Final evidence base | 26 |
| Appendices | 28 |
| Appendix 1: Example of a Proforma | 28 |

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 2024) 'Delivering a sufficient supply of homes' states that 'Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment' (paragraph 72). The NPPF states (paragraph 62 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'.
2. It is incumbent upon Local Planning Authorities (LPAs) to demonstrate, in accordance with paragraph 72 of the NPPF, that their 'planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:
 3. a) specific, deliverable sites for five years following the intended date of adoption³⁴; and
 - b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.
4. The NPPF and the accompanying Planning Practice Guidance (PPG) set out the purpose of a land availability assessment and the main steps that need to be followed to undertake these assessments. Paragraph 61 of the NPPF highlights the importance of having 'a sufficient amount and variety of land can come forward where it is needed' as 'The overall aim should be to meet an area's identified housing need', which will ultimately support the Government's objective of significantly boosting the supply of homes.
5. However, paragraph 78 of the 2024 NPPF now states:

'Local planning authorities should 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 policies³⁸, or against their local housing need where the strategic policies are more than five years old³⁹.'
6. Section 6 of the NPPF 2024 'Building a strong, competitive economy' requires local planning authorities to identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period.
7. Paragraph 10 of the Planning Policy for Traveller Sites¹ also requires local planning authorities to 'identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets'.
8. The PPG (Housing and Economic Land Availability Assessment²) 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,

¹ <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites>

² <http://planningguidance.communities.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/>

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.

9. Both Runnymede and Spelthorne Councils see the benefits of undertaking more comprehensive assessments of land and are therefore committed to undertaking SLAAs 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’. (paragraph 001). However, there is no requirement set out in the PPG for LPAs to identify a five-year supply of land for economic uses. Overall, 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); C1 Hotels.
 - Mixed use developments comprising some of the above use classes.
 - Biodiversity Net Gain (BNG) (including land with potential for BNG, habitat creation or nature recovery)– securing net gains in biodiversity through new development was introduced through the Environment Act 2021. It makes sure that habitats for wildlife are left in a measurably better state than they were before the development³. There are three ways a developer can achieve BNG:
 1. They can create biodiversity on-site (within the red line boundary of a development site).
 2. If developers cannot achieve all of their BNG on-site, they can deliver through a mixture of on-site and off-site. Developers can either make off-site biodiversity gains on their own land outside the development site, or buy off-site biodiversity units on the market.
 3. If developers cannot achieve on-site or off-site BNG, they must buy statutory biodiversity credits from the government. This should be a last resort. The government will use the revenue to invest in habitat creation in England.
 - Suitable Alternative Natural Greenspace (SANG) – these are open spaces that are undergoing enhancements designed to attract more visitors by providing an enjoyable natural environment for recreation as an alternative to the Thames Basin Heaths Special Protection Area (SPA)⁴.
10. 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 in chapter 2.

Housing Market Area and Functional Economic Market Area context

11. Runnymede Borough Council (RBC) and Spelthorne Borough Council (SBC) have in the past been identified as being in the same ‘North West Surrey 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

³ <https://www.gov.uk/guidance/understanding-biodiversity-net-gain#what-bng-is>

⁴ <https://www.runnymede.gov.uk/explore-borough/suitable-alternative-natural-greenspaces-sangs>

authorities were then at different stages in their Local Plan timetables, the SHMA was subsequently updated separately for each authority (in 2019 for SBC, and 2018 for RBC). Both authorities are now preparing their own Housing and Economic Development Needs Assessment (HEDNA), but both authorities continue to work closely together. Both HEDNAs will briefly re-examine the extent of the HMA and Functional Economic Market Area (FEMA).

12. Both authorities' SLAA reports are based on the same agreed joint methodology, first published in December 2015, updated in 2021 and 2024, and again in this report.
13. Runnymede's early functional economic area 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.
14. Spelthorne's most recent FEA analysis (March 2017) 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.
15. 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 HMA and FEA work on matters associated with housing and employment, as appropriate, as well as other Duty to Co-operate (or future cross-boundary strategic planning equivalent) 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.

Runnymede Borough Council: Spatial portrait

16. Runnymede lies in North West Surrey, 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 eight miles from north to south. The population of the borough is an estimated 90,442 (ONS mid-2023 estimates). 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.
17. Approximately 74% (5,801 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.
18. Furthermore, primarily due to Runnymede's proximity to the River Thames, flooding is recognised as a particularly important issue in the borough particularly in the east.

Spelthorne Borough Council: Spatial portrait

19. 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.

20. Spelthorne covers an area of some 5,118 ha, 65% of which is designated as Green Belt. The population of the borough is 103,954 (ONS mid-2023 estimates). 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.
21. 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.
22. Spelthorne is accessible to both the M3 and M25 motorways with junctions at Staines-upon-Thames and Sunbury. The Borough also benefits from six rail stations with direct links to London Waterloo, Reading, Weybridge and Windsor.
23. Heathrow airport lies just north of the Borough in the London Borough of Hillingdon and employs over 8% of Spelthorne residents. Following a period of uncertainty around the expansion of Heathrow Airport, the new Labour Government announced its support for the expansion in January 2025. Both local authorities are part of the Heathrow Strategic Planning Group and will engage in discussions on any future expansion plans moving forward.

Local plan position / evidence documents

24. Runnymede Borough Council (RBC) adopted the Runnymede 2030 Local Plan on 16th 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.
25. A review of the Runnymede 2030 Local Plan was conducted in accordance with planning regulations, and the Council concluded that the Plan requires updating (at the Planning Committee meeting on 23 October 2024). An updated Local Development Scheme (LDS) timetable for work on the new Local Plan was adopted at the same meeting⁵.
26. Background evidence is now being prepared to underpin the new Local Plan. The evidence produced to date is available to view on Runnymede Borough Council's website⁶.
27. 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. The new Spelthorne Local Plan 2024-2039 was submitted to the Secretary of State for independent Examination on 25th November 2022. The Local Plan was subject to Examination in Public in May 2023 and then after a pause the hearings concluded in January and February 2025. It is anticipated that the Local Plan will be adopted in Autumn 2025. Information and

⁵ <https://www.runnymede.gov.uk/planning-policy/local-development-scheme-lds>

⁶ <https://www.runnymede.gov.uk/planning-policy/review-runnymede-2030-local-plan>

documents relating to the Examination can be viewed on Spelthorne Borough Council's website⁷.

SLAA Methodology

28. This chapter 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; and,
 - Assessment of the likelihood of development coming forward (availability and achievability).
29. This 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 overcome them.
30. 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 typically relate to matters such as heritage, open space and ecological designations, and which will also need to be assessed on a site-by-site basis in terms of how they could affect the suitability or restrict the capacity of a site. These are constraints which could potentially be overcome by mitigation measures in some instances.
31. 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

32. 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.

⁷ <https://spelthornelocalplan.info/>

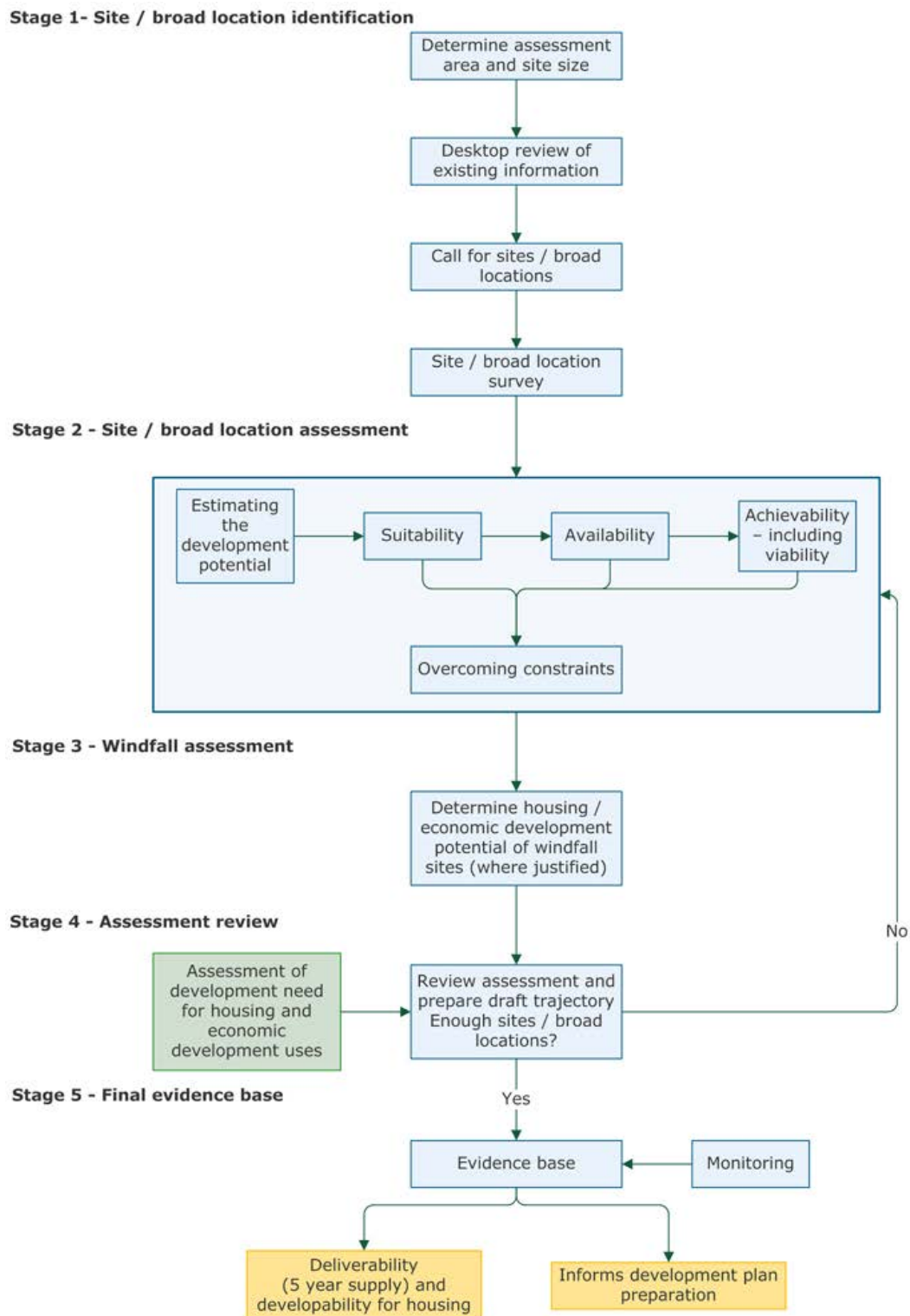


Figure 1: methodology flow chart taken from Planning Practice Guidance- Housing and economic land availability assessment.

Stage 1: Identification of sites and broad locations

33. The SLAA will assess the potential for housing and economic sites. For housing, only sites with a potential development capacity of five or more net housing units will be included and for economic sites, only those of 500m² 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.
34. Alongside identifying sites for residential and employment uses, sites will also need to be found to enable the provision of a suitable quantum of Biodiversity Net Gain (to ensure that, where required, off-site provision and enhancements can be made), as well as enough SANG to provide enough alternative sites so that people avoid using the Thames Basin Heaths Special Protection Area (TBH SPA) heathlands.
35. 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 a 'Call for Sites' exercise, it may not be able to be considered in the next iteration of the SLAA (which is likely to be published several months after the call for sites) but would be considered in the next published version beyond this.
36. The following sets out possible sources that could help identify potentially available sites in the boroughs, the majority of which are suggested by the PPG:
 - Sites submitted as part of previous consultation processes (such as Local Plan Consultation)
 - Previous 5-year housing land supply assessments
 - 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 sites that are 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(s) of public sector land
 - Neighbourhood Plan Forums (Runnymede currently has four Neighbourhood Fora but there are not currently any in Spelthorne)
 - Data from key statutory bodies (such as Surrey 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 (for example via a Call for Sites exercise) and Community Planning Panel (Runnymede) and targeted engagement with the community (Spelthorne).

37. The PPG (Housing and Economic Land Availability Assessment) advises that effective planning for an assessment of land availability must involve co-operation 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, December 2021 and then May-June 2024. The views expressed during those consultations were considered in updating the methodology.
38. Duty to Cooperate partners and targeted stakeholders from the community and the development industry will be contacted again to review the changes proposed to be made in this updated SLAA methodology.
39. Both Councils will also 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 websites. 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. The site may continue to be included in the latter stages of the Local Plan (years 11-15) until its availability can be determined.
40. 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).
41. In addition to the Call for Sites exercise, Runnymede Borough Council also intends to conduct an Urban Area Capacity Study to feed into the SLAA process. This will involve a forensic desktop analysis of the borough's existing Urban Area using Ordnance Survey maps and aerial photography to identify additional potential sites, using density multipliers to understand how the efficient use of land could allow smaller sites to be considered, and then identifying and contacting landowners to proactively enquire about the availability of these sites for development. Further details will be provided in an Appendix to RBC's SLAA.
42. Spelthorne Borough Council will also be proactive in identifying urban sites, an approach which it has adopted since the inception of the SLAA. This is to reflect Planning Practice Guidance on Housing and Economic Land Availability Assessment which sets out that plan makers need to be proactive in identifying as wide a range of sites and broad locations for development as possible⁸. Spelthorne will continue to review the urban area and explore a wide range of sources of supply to maximise yields.
43. It will also need to be checked whether sites identified in the previous iteration of the SLAA have been completed and should therefore be removed. It would be necessary for this exercise to be undertaken each time the SLAA is updated. If a site promoter's site has been developed (to the point of completion), 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.

⁸ Paragraph: 010 Reference ID: 3-010-20190722

44. For remaining sites, it will need to be considered if they meet the definitions of 'deliverable' or 'developable' as contained in the NPPF. The definitions contained in the 2024 version of the NPPF Glossary⁹ are as follows:

Deliverable:

To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within 5 years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within 5 years.

Developable:

To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

45. When assessed against these definitions, if a site had been considered previously to be 'developable' (i.e. coming forward in years 6-15) and has since gained detailed planning permission, in most cases, the site should then be considered as 'deliverable' (coming forwards in years 1-5).
46. 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.
47. 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 (in hectares)
 - Its boundaries as shown on a submitted map / plan
 - Current use(s)
 - 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)

⁹ <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>

- 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
48. Further site assessment will be necessary for sites put forward for consideration, which have a reasonable prospect of being considered deliverable. 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.
49. 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

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

Step 1: Estimate the development potential of a site

51. 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.
52. For some of the larger SLAA sites, certain assumptions need to be made to assess their capacity. This has resulted, in some instances, in there being a range of potential housing figures for a 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. Further information in relation to densities is set out in the Housing Densities & Accessibility section below.

Step 2: Assess the suitability of the site

53. 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 not be identified as deliverable, unless in the case of non-absolute constraints where it can be demonstrated that the constraint can be overcome.
54. 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.

55. 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.
56. 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)

57. 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*¹⁰ 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.
58. 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.
59. 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

60. 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).
61. 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.
62. 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.

¹⁰ <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

Additional absolute constraints in Runnymede

Suitable Alternative Natural Greenspace (SANGs)

63. 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. However, it is possible for BNG measures to be delivered on SANG land, if such habitat creation or enhancement provides measurable additionality over and above the minimum SANG requirements and BNG features do not conflict with the principal purpose of the SANG.

Ancient Woodland

64. Through the Ancient Woodland Inventory carried out in 2011, several ancient woodland areas in Runnymede have been identified (and these have 15m buffer zones around them). 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 193(c)) and policy EE9 of the adopted Runnymede 2030 Local Plan.

Additional absolute constraints in Spelthorne

Public Safety Zone - Heathrow

65. 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

66. 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.
67. Paragraph 145 of the NPPF states that 'Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.'
68. 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.

69. In accordance with the NPPF, previously developed¹¹ sites in the Green Belt are capable of contributing to development needs through limited infilling or the partial or complete redevelopment of such sites (subject to the caveats in paragraph 154(g) of the NPPF) 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.
70. 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 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.

Grey Belt

71. The 2024 version of the NPPF introduced the concept of 'grey belt', which is defined in the Glossary as: 'land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.'
72. Paragraph 148 of the NPPF states that 'Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations'. To identify potential grey belt land, Runnymede and Spelthorne Councils, along with Elmbridge Borough Council are intending to perform a joint review of Green Belt boundaries. The Government expects all local planning authorities reviewing Green Belt boundaries to identify where land is grey belt, dividing the Green Belt land into separate assessment areas to analyse the extent to which this land strongly contributes to Green Belt purposes (a), (b) or (d), using criteria provided in the PPG. It is therefore too early to identify and assess grey belt sites in this first iteration of the 2025 SLAA, but any sites falling within the grey belt areas identified in the separate Green Belt assessment, that are subsequently identified as having development potential, will be assessed in future iterations of the SLAA.

¹¹ As defined in annex 2 of the NPPF.

Garden centres

73. In the previous SLAA methodology, a consistent approach was needed to assess the potential of garden centres for development. It was proposed that unless there was an established lawful use for the site of retail / residential by the way of a Certificate of Lawfulness, the site would be treated as being in horticultural use and, as such, was not considered to be previously developed land for the purposes of the SLAA. With the publication of the 2024 NPPF, garden centres or horticultural greenhouses might be reclassified as grey belt land. Until such a time that grey belt areas are identified in the Green Belt assessment as above, the approach for garden centres in the previous iteration of the SLAA methodology will be pursued..

Flood Risk

74. Whilst flood zone 3b is an absolute constraint to development, sites within other lower risk flood zones can be considered suitable depending on the vulnerability of the use proposed. As highlighted above, a significant proportion of land in Runnymede and Spelthorne is at risk from fluvial flooding. It should be noted that since the last iteration of this document, the Environment Agency has updated their long-term flood risk data and modelling as part of the National Flood Risk Assessment, and this has resulted in enhanced flood risk information which will be used as part of the SLAA exercise.
75. 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 and, where possible, should reduce flood risk overall (NPPF paras. 170 and 178). 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.
76. 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 six onwards, provided that the landowner undertakes suitable flood risk assessment and mitigation measures through the planning application process.
77. 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. The Planning Practice Guidance states¹² that 'During the site survey the following information can be recorded... physical constraints (e.g. ... flood risk', but it does not specify or require that all forms of flood risk need to be assessed. Below is a summary of the other sources of flooding in both boroughs which may impact on the suitability of development on sites:
- Surface water flooding
 - Sewer flooding
 - Groundwater flooding

¹² [Housing and economic land availability assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment) – see Paragraph: 015
Reference ID: 3-015-20190722

- Flooding from reservoirs
 - Flooding from canals and other artificial sources
78. Developers / applicants are advised to consult the Strategic Flood Risk Assessment of each authority for more information about the different flood risk is in each borough. During the plan making process, a more detailed assessment of the different types of flood risk affecting each SLAA site will be considered as part of the Strategic Sequential Test.
79. 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.

River Thames Scheme (Egham to Teddington) Safeguarding Areas

80. The River Thames Scheme is a proposed major infrastructure project that will reduce flood risk between Egham and Teddington. Part of the Scheme consists of a new river channel built in two sections - through Runnymede (between Egham Hythe and Chertsey) and through Spelthorne (between the River Thames at Laleham before meeting Littleton North Lake and upstream of Desborough Cut).
81. Whilst the exact location of the flood channels has not yet been determined, the EA has indicated broad areas which should be safeguarded.
82. 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 potentially 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, particularly if the proposed uses are for SANG and/or BNG.

Waste and Minerals sites

83. Surrey County Council is the Local Planning Authority for waste and minerals. Paragraph 223(c) of the NPPF requires LPAs to:
- 'safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas⁷⁷; 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);'*
84. 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...'*

85. Whilst safeguarded sites or allocations for minerals and waste are not absolute constraints, Runnymede and Spelthorne will discuss with Surrey 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.
86. 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)¹³ and policy 7 of the Surrey Waste Local Plan 2019-2033¹⁴.
87. 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 protocol¹⁵ 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

88. Footnote 65 to paragraph 188 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.'
89. 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 (in 2017) and this will again be considered in the next iteration of this evidence base document. Therefore, when sites are submitted to the SLAA, any assessment made will need to consider the site's agricultural value 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

90. 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 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

¹³ Surrey Minerals Plan Core Strategy (2011). Available at: <https://www.surreycc.gov.uk/land-planning-and-development/minerals-and-waste/minerals-core-strategy-development-plan>

¹⁴ Surrey Waste Plan (2020). Available at: <https://www.surreycc.gov.uk/land-planning-and-development/minerals-and-waste/waste-plan>

¹⁵ 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

unsuitable, but not excluded as on very rare occasions, development within 400m has been found to be acceptable. For example, sites for economic purposes and C2 uses with high dependency residents may be considered suitable within the 400m buffer.

Biodiversity Buffer Zone

91. 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.
92. 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.
93. In addition, the Basingstoke Canal Authority supports an undeveloped buffer zone of 5-8m width alongside the canal, which should serve as green infrastructure as well as habitats of biodiversity value.

Conservation Areas

94. Runnymede and Spelthorne both have 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, any significant development opportunities would need to demonstrate how the relevant Conservation Area would be protected and enhanced. .

Public open space

95. Runnymede published an updated Open Space Study (OSS) in 2025 whilst the Spelthorne Open Space Assessment was published in 2019. Spaces identified in these studies (or any future updates) should be considered a significant constraint to development unless it can be demonstrated that the land is surplus to requirement, or the provision could be replaced, or the development is for alternative sports and recreational provision which is more beneficial (NPPF paragraph 104).

Spelthorne Specific Constraints Affecting Suitability

Heathrow Airport Noise Contours

96. 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. The new Spelthorne Local Plan 2024-2039 (which is anticipated for adoption in autumn 2025) also seeks to minimise adverse impacts where noise levels are at or exceed 66 Leq. 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.

Other Considerations Affecting Suitability or Capacity

97. 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, then the new Spelthorne Local Plan 2024-2039 once adopted. Compliance with national policy contained in the NPPF will also be considered.

Step 3: Is the site available?

98. 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.
99. 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'* (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.
100. Where either authority identifies a site or opportunity which it considers could come forward or has potential, but there are questions about the site's availability, 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 development, 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?

101. 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.
102. When estimating a site's potential, regard will need to be had to the latest Strategic Housing Market Assessment (SHMA) or Housing and Economic Development Needs Assessment (HEDNA) for the borough in question 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.

103. 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 site would still prove developable at lower yields or for different uses.
104. It is anticipated 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.
105. The final SLAA report will 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

106. The PPG states 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 in line with policies set out in the NPPF (particularly paragraphs 129 and 130).
107. The adopted Runnymede 2030 Local Plan does not 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.
108. Paragraphs 129 and 130 of the NPPF set out that plan making and decision taking need to 'make the most efficient use of land' and ensure that 'developments make optimal use of the potential of each site'. Paragraph 130(a) goes further by saying that policies: 'should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas'.
109. To help do this Runnymede will undertake a couple of steps including:
 - Establishing the density baseline of development in the Borough, by identifying different density character areas within each settlement area (looking at the residential areas only, so as not to have the residential density diluted by non-residential uses such as shops, schools, parks etc.) and then determining the typical dwellings-per-hectare densities within each.
 - Apply optimised density ranges, ensuring that the approach is not excessively optimistic, but still includes an uplift on the existing density of an area to meet the requirements of the NPPF.
110. Policy ST2: Planning for the Borough of the new Spelthorne Local Plan 2024-2039 (anticipated adoption Autumn 2025), sets out that *'the Council expects that all development proposals located within or adjacent to town/local centres or a public transport interchange will seek to optimise the density of development, in order to make the most efficient use of the land in the most sustainable locations'*.

111. Policy PS2: Designing Places and Spaces of the new Spelthorne Local Plan sets out the principles to guide the design of new development in the borough. Similarly, this does not set out specific densities for development to optimise densities and make efficient use of land, but instead seeks for development to be of high-quality design and layout, having regard for the local character.

In addition, the emerging Spelthorne Design Code will be used to guide development design and density once adopted. This does not set out specific densities but sets out principles on design and development types, including density to make the most efficient use of land.

112. 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.
113. For previously developed sites in the Green Belt, the density will be governed by the need to comply with paragraph 154 g) of the NPPF, which states that:
- 'g) limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt' is considered appropriate.*
114. As such, a suitable density on these sites will need to be considered on a case-by-case basis.
115. As such, SLAA densities will need to be assessed on a site-by-site basis to consider a suitable density/density range for development. This assessment will be made in line with paragraphs 129 and 130 of the NPPF and planning practice guidance, any relevant local policies and any adopted Borough Design Codes.

Air Quality

116. Runnymede currently has two Air Quality Management Areas (AQMA) in place; one along the M25 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 NOx in certain areas of the Borough.
117. Any sites put forward for consideration in the AQMAs will need to be considered in line with the requirements of paragraph 199 of the NPPF, relevant local plan policies and should have regard to Runnymede's Air Quality Action Plan¹⁶ and Spelthorne's Air Quality Action Plan¹⁷.

¹⁶ <https://www.runnymede.gov.uk/pollution/air-quality-1/3>

¹⁷ Spelthorne Air Quality Action Plan, https://www.spelthorne.gov.uk/media/27415/Air-Quality-Action-Plan-2024-2029/pdf/Air_Quality_Action_Plan.pdf?m=1733918009983

Stage 3: Windfall assessment (for residential development)

118. 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.
119. The supply calculation in any housing trajectory produced (when required to meet NPPF requirements) will include an allowance for windfalls in the five-year housing land supply as windfall development has consistently formed a significant part of the housing supply in both boroughs and is likely to continue to do so. This is evident through analysing the previous SLAAs and looking at historic windfall delivery rates.

Runnymede

120. The windfall figure will be derived from averaging housing delivery from sites over the preceding five 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 four onwards.

Spelthorne

121. Spelthorne's windfall calculation is based on the average completion of sites of four units or less over the past seven years. This average figure is included within the housing trajectory. 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.

Sites without planning permission

122. Previously, the approach to sites without planning permission was to include them in the trajectory if there was some evidence that they could deliver units in the first five-year period of the trajectory, but with an under-delivery discount applied to them. This was following the approach set out in an earlier version of this methodology, and which underpinned the development the trajectory used in the Runnymede 2030 Local Plan examination. However, this plan was examined under the 2012 NPPF, which had the following definition of deliverable at footnote 11 to paragraph 47:

'To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.'

123. This is far less detailed than the current definition set out in the 2024 NPPF Glossary which is as follows:

Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

124. Due to the more recent definition of deliverability from the 2024 NPPF being more detailed than the 2012 version, with an emphasis on sites with planning permission, but more importantly, the emphasis in point b) of there being a need for 'clear evidence' that completions **will begin** [RBC emphasis] (compared to 'clear evidence that schemes will not be implemented' in the 2012 definition) for certain listed types of site within five years, the Councils will ensure that sites included in the five year housing land supply (5YHLS) trajectory meet the stricter tests of deliverability set out in the current definition. This will ensure that there is greater certainty that they will provide units within the five-year timeframe, but due to this, a discount will no longer applied, due to this greater certainty that the sites included will deliver the full number of units set out in the trajectory.

Permitted Development (PD)

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

126. From the start of 2020¹⁸, the Government made significant changes to town centre use classes. 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.

127. The Government introduced legislation that from 1 August 2021 that allows buildings under use class E to convert to residential use (class C3) without the need for applicants to submit a planning application. In February 2024, the Government amended this element of permitted development (under class MA rights) which removed the previously existing 1,500sqm size limit for these applications as well as the three-month vacancy requirement. However, the building must still have been in commercial business and service use (class E) for two years before benefiting from the right.

128. 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

¹⁸ <https://www.planningresource.co.uk/article/1701908/no-size-limit-new-town-centre-to-residential-use-permitted-development-right>

- 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.
129. Permitted development rights have had a significant impact in both boroughs since they were first introduced in May 2013. Not all 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.
130. 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 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 could become less advantageous for developers to make these conversions.
131. 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

132. 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.
133. 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 will consider 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.
134. 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.
135. As with student accommodation and in accordance with the PPG (Housing Supply & Delivery), purpose-built housing for older people can contribute to a local authority's five-year supply calculation. 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

136. 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.
137. Runnymede Borough Council will invite comments on SLAAs prepared as part of Local Plan preparation process through the consultation stages. As such, the initial version of the document that is published is likely to be branded as an interim version and will be amended as appropriate following the consideration of comments from key stakeholders, including the development community.
138. Decisions regarding which sites might be allocated for development will be a matter for each authority's Local Plan process not 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.

Stage 4: Assessment review

139. The PPG states at paragraph 24¹⁹: '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'. However, in line with changes made in the 2024 NPPF, trajectories will be produced annually as the local planning authorities are required to assess whether they can demonstrate a 5YHLS each year.
140. 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.
141. 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.
142. 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.

¹⁹ <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

143. 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 try and 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, noting that contents of paragraph 61 of the NPPF which confirms that 'The overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community'.

Stage 5: Final evidence base

144. Both Councils will produce a housing trajectory annually as required by the NPPF. Trajectories will seek to illustrate the distribution of sites for different types of residential uses during the set year periods.

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

- A **Report**, which details the SLAA assessment background, methodology and conclusions
- A **Site book**, 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 Site book may be broken down into separate sections / documents to reflect different site typologies, sizes and phasing.

146. Spelthorne BC will also produce a digital map identifying all sites assessed through the SLAA and their categorisation i.e. whether they have been discounted or their anticipated delivery timeframe.

147. 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 FEMA.

148. The assessment will be published on the relevant Council's website to ensure it is publicly available.

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

150. 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.
151. During Local Plan development, each Council's SLAA will be updated on an annual basis in line with the PPG until such a time that sites have been allocated in either Council's adopted Local Plan. Following this point, in line with paragraph 79 of the NPPF, 'To maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission'. The Councils both do this on a continuous basis through their housing monitoring record keeping and report on it annually via the publishing of their respective Authority Monitoring Reports.

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 500m² 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 **DATE 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 land²⁰ | 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 | | |
| Land ownership | | |
| Other | | |
| What would be required to overcome the constraints identified that currently prohibit development on the site? | | |
| Proposed Development | | |
| Is the site currently in the planning process? | <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> | |
| Is the site available now? If not, when is it expected to be available? | | |
| Number of proposed Houses / Units | | |
| Number of Houses / Units to be demolished | | |
| Expected density (Dwellings per hectare) | | |
| Indicative housing mix | | |

²⁰ Defined in Annex 2 of the National Planning Policy Framework 2023

| | |
|--|---|
| Would you consider making the site available for other residential uses (traveller site, student accommodation, accommodation for older people, self-build)? | If yes, please state which other residential uses you would consider making the site available for |
| Would you consider making the site available for other uses (for example, economic, retail, leisure, BNG, SANG)? | Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, please state which other uses you would consider making the site available for |
| 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 | 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"/> |
| Other information | |
| Viability (has any financial appraisal been undertaken and what are the outcomes) | |
| Is there any other information you feel is relevant? | |
| Please also include a copy of the site plan with boundaries clearly shown with your completed form whether by post or email. | |

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.

For all information contained within this document contact:

Runnymede Borough Council
The Civic Centre
Station Road
Addlestone
Surrey KT15 2AH

Tel 01932 838383

email: planningpolicy@runnymede.gov.uk

www.runnymede.gov.uk

Further copies of this publication,
or copies in large print other
formats or languages
can be obtained via the
above contact details.



Search: Runnymede Borough Council