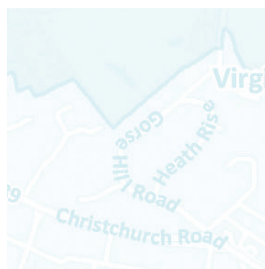
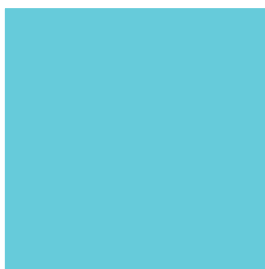


Strategic Land Availability Assessment

Methodology

December 2015



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Background

National planning policy

1. The Government aims to ensure there is enough land available for the delivery of new homes. Section 6 of the National Planning Policy Framework (NPPF) “Delivering a wide choice of high quality homes” requires Local Authorities to demonstrate that there is sufficient land available to deliver new homes in the future. Therefore, it is incumbent upon Local Planning Authorities (LPAs) to demonstrate they have a five year supply of land available for housing delivery.
2. Paragraph 47 of the NPPF highlights the process LPAs should follow with regards to housing supply:

“To boost significantly the supply of housing, local planning authorities should:

 - use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;*
 - identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;*
 - identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 ...”*
3. Paragraph 161 of the NPPF sets out that Local Planning Authorities should assess the existing and future supply of land for economic development and its sufficiency and suitability to meet identified needs and that reviews should be undertaken at the same time or combined with Strategic Housing Land Availability Assessments. 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.
4. The Government published Planning Practice Guidance (PPG) in 2014, a web-based tool designed to complement policy contained within the NPPF, with the aim of streamlining guidance to make it more accessible to members of the public. The PPG supersedes many of the previous circulars and guidance and is updated regularly.
5. The PPG contains guidance on how LPAs should make an assessment of housing land supply for a number of residential uses and also puts an additional requirement upon LPAs to make an assessment of land availability for economic uses. Therefore, to comply with current national guidance, sites submitted will be looked at in terms of suitability for development of a number of different uses. To reflect this change in land assessment, the document will in future be

referred to as a Strategic Land Availability Assessment (SLAA). The guidance contained within the PPG can be found in its [Housing and economic land availability assessment¹](#) section.

6. 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 the 'NPPF identifies the advantages of carrying out land assessments for housing and economic development as part of the same exercise, in order that sites may be allocated for the use 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 B use classes (business, general industry, storage & distribution), class A1 (shops), class D2 (assembly & leisure)

Mixed use developments comprising some of the above use classes

7. This SLAA methodology has therefore been written so as to be compliant with current national policy and guidance and justifies any local variations in the approach taken.
8. In addition to national policy and guidance, in January 2015, the Department for Communities and Local Government (DCLG) published a consultation entitled, 'Building more homes on brownfield Land'. This introduced a proposal that would require LPAs to put local development orders on qualifying brownfield land to facilitate housing development. These proposals have now been included in the Housing & Planning Bill which was introduced to Parliament in October 2015. Any updates to the Council's SLAA methodology due to legislative changes would be subject to focused consultation with a Development Market Panel (discussed in more detail later in this paper).
9. In addition, on 16th March 2015, the Government updated national policy to support the development of more starter homes for young first-time buyers. This type of housing can be used against the housing requirement, but the PPG states that Local Planning Authorities should not make an allowance for starter homes in their five year housing land supply until such a time that there is suitable evidence to confirm starter homes will consistently come forward. A requirement for housing developments to provide starter homes has also been included in the Housing & Planning Bill. However, at this stage there is no detail about which housing developments would qualify for starter homes. Again, any update to the Council's SLAA methodology due to legislative changes, may be subject to focussed discussion with a Development Market Panel.

Local planning policy/evidence

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

10. Until June 2014, Runnymede Borough Council (RBC) was progressing work on its Local Plan Core Strategy (LPCS). An initial hearing on the submitted LPCS took place on 9th April 2014 and the Inspector reached the conclusion that RBC should withdraw the draft Plan as he raised concerns with regards to the duty to cooperate and RBC's broad approach to housing. This was in part because RBC could not demonstrate an up-to-date objectively assessed need (OAN) for housing. The Inspector recommended RBC commission a new Strategic Housing Market Assessment (SHMA) as the housing evidence was not considered robust. The decision to withdraw the LPCS was ratified by Runnymede's Planning Committee on 25th June 2014.
11. 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.
12. Subsequently, Runnymede Borough Council (RBC) and Spelthorne Borough Council (SBC) commissioned independent consultants to produce a joint SHMA as it has been identified that both authorities are in the same Housing Market Area (HMA).
13. The SHMA has been published and is available to view on both Councils' websites². The proportion of the Objectively Assessed Need (OAN) set out in the SHMA which is attributed to either authority is an unconstrained figure. This will assist in assessing a five year housing land supply in either authority's SLAA until emerging housing targets are progressed through Local Plan preparation. It should also be noted that the PPG note on *Housing and Economic Availability Assessments*, at paragraph 30 states:

'Where evidence in Local Plans has become outdated and policies in emerging plans are not yet capable of carrying sufficient weight, information provided in the latest full assessment of housing needs should be considered. But the weight given to these assessments should take account of the fact they have not been tested or moderated against relevant constraints'.
14. The five year land supply for housing may also be considered across the whole HMA in future SLAA preparation although in 2015/16, each LPA will carry out its own SLAA.
15. Runnymede Borough Council has also commissioned independent consultants to complete work on a borough-wide Green Belt review. This Green Belt review was completed in December 2014, which identifies a limited number of land parcels that could be returned to the urban area as they are considered by the consultant to no longer meet the purposes of including the land within the Green Belt as effectively as other areas. However, the findings are still being considered and any recommendations the Council might make based on the evidence will have to be tested through the Local Plan process. The Green Belt review can be found at <https://www.runnymede.gov.uk/article/9200/Green-Belt-policy-documents-and-guidance>. All properties identified in the resultant land parcels have been written to as part of the Runnymede SLAA call for sites exercise to determine if they would be willing to have their land considered for development should the areas be released from the Green Belt.
16. In addition, Runnymede officers are conducting a Green Belt boundary review following the completion of the independent review of the Green Belt. This review is being undertaken in order to consider, and if necessary make any minor amendments to, the boundary to make it

² Runnymede & Spelthorne draft SHMA (2015) GL Hearn. Available at: <https://www.spelthorne.gov.uk/article/10078/SHMA>, <https://www.runnymede.gov.uk/article/10102/Strategic-Housing-Market-Assessment-SHMA>

more logical and/or defensible. Again, any outcomes from this review will need to be considered through the Local Plan process.

17. Runnymede Borough Council and Spelthorne Borough Council have prepared this joint SLAA methodology. The aim of the joint methodology is to ensure a consistent approach to assessing land across the Housing Market Area and Functional Economic Area (FEA) in terms of its suitability and potential for development.
18. RBC will be producing an economic strategy, which will use the evidence produced in the FEA assessment, an updated Employment Land Review (ELR) and retail study, as well as the evidence collected in the SLAA to identify opportunity areas for economic development in Runnymede. SBC has published an economic strategy³ and Retail Study⁴ but is yet to undertake an assessment of its FEA or an ELR.
19. As such, under the Duty to Cooperate both Runnymede and Spelthorne will engage with other Local Authorities identified as having functional links with Runnymede & Spelthorne through the HMA and FEA work carried out to date, as well as /prescribed bodies in relation to housing and employment issues, with a view that an agreed way forward on such issues can be agreed, which may include a joint evidence base being produced.
20. Both authorities have included minor variations in this SLAA methodology to reflect their local circumstances. These have been agreed between the two authorities and may be discussed further with their respective Development Market Panels should circumstances change. As such, further variations may be reflected in future iterations of the methodology following agreement by both authorities.
21. A draft version of this methodology was the subject of consultation with Duty to Cooperate partners and general stakeholders during September/October 2015. Comments arising from those consultations have been taken into account in this final version of the methodology. A table of the comments received and how these have been taken into account is available on either Council's website⁵. Each Council may also seek further advice on whether the methodology is robust and consistent with the PPG note on *housing and economic land assessment* by discussion or consulting with their respective Development Market Panels, especially where legislative changes arise.

Development Market Panel (DMP)

22. Runnymede and Spelthorne consider that to add robustness to the SLAA process, a Development Market Panel should be set up to advise each Council on technical aspects of land availability such as providing market commentary and commenting on development viability. The initial thinking was to hold a joint Panel for both Runnymede and Spelthorne; however, each

³ Spelthorne Economic Strategy (2013) SBC. Available at: <https://www.spelthorne.gov.uk/econstrat>

⁴ Retail & Other Town Centre Sues Study (2015) GVA. Available at: <https://www.spelthorne.gov.uk/article/9572/Retail-Study>

⁵ Draft SLAA Methodology Consultation Comments available at: <https://www.runnymede.gov.uk/article/10103/Strategic-Land-Availability-Assessment-SLAA-previously-known-as-the-SHLAA>
<https://www.spelthorne.gov.uk/article/2887/Planning-Policy>

authority has now agreed to hold its own Development Market Panel.

23. Each Panel will include those parties as identified in the PPG who are qualified to advise on the technical aspects of the SLAA such as developers; those with land interests; land promoters; local property agents and registered providers and who each represent a different company/business/interest group. The parties identified will also include representatives who have the knowledge/experience to comment on the methodology/sites that are proposed for economic development in terms of their viability.
24. Separate Panels will be set up with a Terms of Reference for each drafted and approved through the appropriate Council's processes and agreed by the Panel for that authority. The Terms of Reference for each Panel will be available to view on the respective Council's website.
25. It should be noted that each Panel is not a decision making body 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 a DMP 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.
26. Runnymede Borough Council has also set up a Community Planning Panel and the Spelthorne Statement of Community Involvement (SCI) proposes a Local Plan Forum. These will include groups identified through the PPG as follows: local communities; partner organisations; Local Enterprise Partnerships; businesses and business representative organisations; parish and town councils; neighbourhood forums preparing neighbourhood plans (where applicable). A number of documents in relation to each Local Plan may be considered by these panels, including the SLAA.
27. The SLAA report (which this methodology will help officers to produce) will form part of the evidence base that will inform the development of Runnymede Borough Council's new Local Plan (Runnymede 2035) and the review of the Spelthorne Local Plan.

Housing Market Area and Functional Economic Area context

28. The SHMA confirms that RBC and SBC are within a housing market area together. Runnymede's FEA report 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.
29. The PPG recommends that a joint SLAA should be conducted over the HMA and the FEA area. The SHMA does acknowledge the clear links with parts of Elmbridge, Woking and Hounslow Boroughs, as well as the links between Runnymede/Spelthorne and Heathrow Airport in Hillingdon. Therefore both the SHMA and FEA analyses acknowledge links with the same surrounding Boroughs.

- 30 However, the surrounding Authorities are at different stages of Plan production and it would be difficult to produce a joint evidence base with all of them on this basis. In terms of the London Boroughs, their SLAA is prepared by the GLA/Mayor of London which includes all London Boroughs. Therefore it would clearly not be appropriate to form a joint SLAA with the London Boroughs. Nevertheless, RBC and SBC have worked together on this joint methodology and consulted authorities/prescribed bodies within the HMA /FEA under the Duty to Cooperate.
- 31 Given that the SLAA is required to make an assessment of both housing and economic land availability, it is considered appropriate to provide a brief spatial portrait of both Runnymede and Spelthorne Boroughs.

Runnymede Borough Council

- 32 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 number of 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.
- 33 Almost 79% (6136 hectares) of Runnymede's total land area is designated Green Belt and historically it has been subject to strict policies preventing inappropriate development.
- 34 Furthermore, primarily due to Runnymede's proximity to the river Thames, flooding is recognised as a particularly important issue in the borough. As an indication 28.8% of the Borough is covered by Flood Zone 2, 21% of the Borough is covered by Flood Zone 3a and 13.3% of the Borough is covered by Flood Zone 3b. The urban settlements of Egham and Chertsey are most affected.
- 35 RBC has made an analysis of the FEA it sits within to identify the key Authorities it should be working with in order to understand the influences that will shape economic development in the area. The draft FEA identifies that Runnymede broadly sits in two FEAs (one is north facing, one is south facing) and therefore should be working with a number of Authorities, including Spelthorne.
- 36 The HMA and the FEA overlap significantly and therefore many of the same boroughs and districts identified in the FEA analysis are also identified for RBC to cooperate with in relation to housing issues (set out in the Runnymede/Spelthorne SHMA). The Council will therefore continue to work with those LPAs identified in the HMA and FEA on these matters. The Local Planning Authorities considered to be part of the same FEA and/or HMA as Runnymede are Spelthorne and parts of Woking, Elmbridge, Hounslow and Hillingdon.

Spelthorne Borough Council

- 37 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.

- 38 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. The majority 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.
- 39 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. The area susceptible to a 1 in 100 year flood event covers some 896ha or 17.5% of the borough, 358ha (or 7%) of which falls within the urban area.
- 40 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.
- 41 Heathrow airport lies just north of the Borough in the London Borough of Hillingdon and employs over 8% of Spelthorne residents. The Airports Commission's preferred option for airport expansion in the south east is for a new northwest runway at Heathrow.
- 42 Spelthorne has not currently undertaken any study to determine which FEA it lies within, but is aware of the findings of the Runnymede FEA study, which identifies Spelthorne as a linked authority and the extent of the HMA.

Methodology

- 43 This section sets out a nationally compliant approach for preparing the SLAA. The PPG 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)
- 44 This draft methodology is not an entire replication of that set out in national guidance, but is considered to be consistent with the Government's recommended approach. 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.
- 45 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 considered to be those which cannot be overcome and where a site can be automatically excluded from further assessment. The other constraints are those which would affect the suitability or restrict the capacity of a site. These are constraints which could be overcome, 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.

- 46 A number of other issues are discussed in this SLAA methodology including the approach to student accommodation, housing for older people and housing densities. The reasons for the proposed approaches to these issues are set out below or later in this methodology.

Other Issues

Student Accommodation

- 47 Runnymede contains a high population of students who attend Royal Holloway University of London (RHUL), an internationally recognised University that is located in the north of Runnymede borough. In terms of accommodation, the draft Runnymede & Spelthorne SHMA identifies that the University is likely to see a percentage decrease in the number of students living off-campus due to an increase in purpose-built accommodation that will be constructed for students.
- 48 Although the PPG's methodology on undertaking assessment of land availability discusses that student accommodation can be included towards the housing requirement (based on the amount of market accommodation it releases), it does not specifically discuss how this should be calculated (the [Student accommodation and accommodation for older people](#) section of this methodology confirms both Councils' approach in this regard).

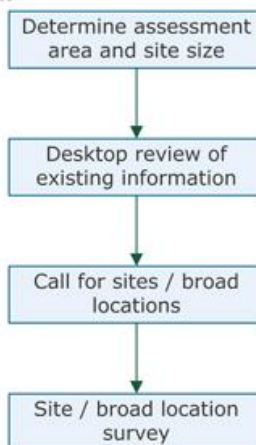
Older People

- 49 Data from ONS shows that Runnymede and Spelthorne are expected to see a notable increase in the older person population with the total number of people aged 55 and over expected to increase by approximately 42% over the next 20 years (from 2013). The Government's intention is to assist people to stay in their homes in to old age and allow them to live an independent lifestyle. Whilst this may be the case, 'Projecting Older People Population Information' (POPPI) data shows that between 2013-2033, there is also expected to be a significant increase in the number of people with dementia (a 77% increase across the HMA, alongside a 64% increase in the number of people with mobility problems).
- 50 Therefore, despite the Government's intention, given the higher levels of disability and health problems amongst older people, there is likely to be an increased requirement for specialist housing options moving forwards. It may be the case that by providing more housing options for older people (including smaller units and specialist housing), this may free up homes for growing families to occupy.
- 51 This assumption is made given that in Runnymede and Spelthorne, census 2011 data shows that older people households are more likely to under occupy their housing than other households and in total 53% of older people households across the HMA have an occupancy rating of +2 or more (meaning there are at least two more bedrooms than are actually required by the household). This indicates that 3+ bedroom homes could become available if older people move in to specialist housing (as discussed above), although not all of these will be released into the market sector as some will be part of the social housing stock.
- 52 See the [student accommodation and accommodation for older people](#) section of this methodology for more information on how the Council can calculate the number of houses that specialist housing for older people could release back to the market, which will assist calculating the five year housing land supply.

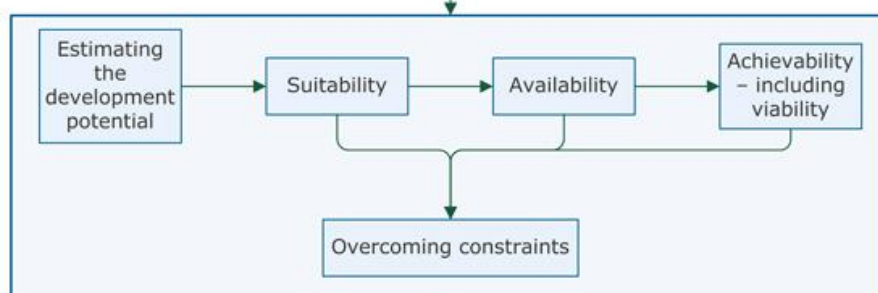
Producing the SLAA

53 The figure below, taken from the PPG sets out the stages of production of the SLAA. Runnymede & Spelthorne will follow this standardised methodology.

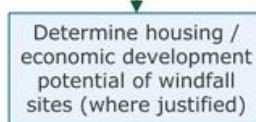
Stage 1 - Site / broad location identification



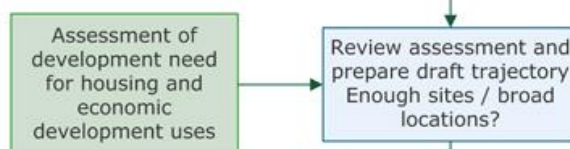
Stage 2 - Site / broad location assessment



Stage 3 - Windfall assessment



Stage 4 - Assessment review



Stage 5 - Final evidence base

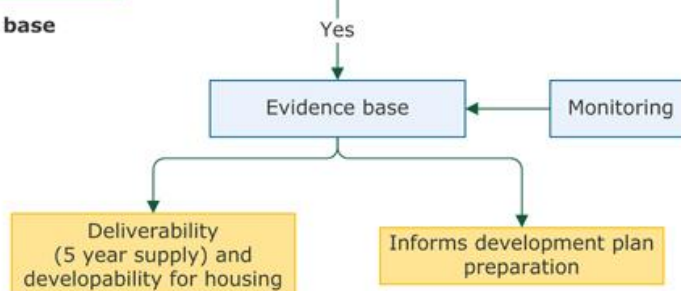


Figure 1: methodology flow chart taken from Planning Practice Guidance- Housing and economic land availability assessment

Stage 1: Identification of sites and broad locations

- 54 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 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.
- 55 Spelthorne has always counted sites of less than 0.4ha as windfalls in past monitoring reports and these sites also form part of the Spelthorne housing trajectory but not the five year housing land supply. Care will need to be taken not to double count smaller sites of less than 0.4ha.
- 56 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 the majority of 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.
- 57 The following sets out a number of 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)
 - Annual Monitoring Report
 - 5 year housing land supply
 - Valuers department for Council-owned land
 - Existing housing/economic development allocations
 - Sites reserved for housing in previous Local Plans
 - 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
 - Potential urban extensions and new free standing settlements
 - 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 (does not currently apply to Runnymede or Spelthorne)
 - Data from key statutory bodies (such as the County Council)
 - Vacant and derelict land and buildings and business requirements
 - Development management officer knowledge
 - Development Market Panel, Community Planning Panel or Local Plan Forum
- 58 In addition to the desktop research to identify sites, Runnymede conducted its annual call for sites exercise in September 2015. In 2014, RBC conducted a call for sites for traveller sites, and

the information gathered from this exercise will now be included in the SLAA. Spelthorne will be undertaking its call for sites in 2016. For future SLAA's, both authorities will issue a call for sites in their annual update of the SLAA where this is considered necessary.

- 59 The PPG 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 cooperate. Runnymede and Spelthorne consulted duty to cooperate parties and general stakeholders on a draft version of the SLAA methodology in September/October 2015. The views expressed during that consultation have been taken into account in this final methodology and can be viewed on either Council's website. Duty to Cooperate and general stakeholders will continue to be involved throughout the evidence base preparation of the SLAA through the DMP, Community Planning Panel/Local Plan Forum and where appropriate general consultation.
- 60 Both Councils will contact agents/land owners on their previous 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.
- 61 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).
- 62 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.
- 63 From this year onwards, to reflect guidance contained in the PPG, a more thorough assessment of sites will need to be undertaken to assess suitability for other residential uses and employment uses (including mixed-use schemes) as defined in paragraph 6 of this SLAA methodology, as well as consideration of viability. Therefore, a sample of site assessments or site typologies forming the five-year supply will be considered by each DMP in terms of viability issues/concerns as a sense-checking exercise, which will provide a more credible and robust analysis.
- 64 When either Council conducts its call for sites exercise, it will be expected that promoters putting forward a site will be required to provide a certain amount of information to help assist in making an assessment of the site. Appendix 1 shows a copy of the site proforma that site promoters should complete for each site submitted through the call for sites process.

- 65 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
- 66 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, which states that site surveys should be proportionate to the detail needed for a robust appraisal and sites that are considered to be more realistic for potential housing development should be surveyed in greater detail.
- 67 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

- 68 After identifying possible sites, the next stage is to assess each site in detail for its development potential.
- 69 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

- 70 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. For sites in Runnymede this step should be read in conjunction with the Runnymede Traveller Accommodation Assessment (TAA) methodology⁶, 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

⁶ Runnymede TAA methodology <https://www.runnymede.gov.uk/CHttpHandler.ashx?id=10846&p=0>

to constraints will be considered in future site assessments. Any assessment of development potential for housing will need to comply with paragraph 47 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 site¹³

- 71 There are a number of 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.
- 72 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.
- 73 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.
- 74 The approach to how constraints will be taken into account when assessing the suitability of sites is set out below.

Runnymede & Spelthorne Absolute Constraints

Flood Zone 3b (Functional Floodplain)

- 75 The NPPF sets out that inappropriate development in areas at risk 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 flood zones based on their vulnerability. All development except for water compatible development or essential infrastructure which has passed the exception test is considered to be inappropriate in zone 3b (functional floodplain). As such, any site entirely within flood zone 3b will be excluded from the assessment.
- 76 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.

- 77 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

- 78 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).
- 79 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.
- 80 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)

- 81 The Borough's SANGs have an essential purpose in militating 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

- 82 Through the Ancient Woodland Inventory carried out in 2011, a number of ancient wooded 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 118) and policy NE12 of the Runnymede Local Plan.

Spelthorne Absolute Constraints

Public Safety Zone - Heathrow

- 83 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

- 84 As already set out, the majority of 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. In addition, the extent of the Green Belt can only be amended through the adoption of a Local Plan, in accordance with paragraph 83 of the NPPF.
- 85 Whilst both local and national policy severely restricts development within the Green Belt, this is a policy constraint that could be overcome, 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.
- 86 In accordance with NPPF paragraph 89, previously developed⁷ sites in the Green Belt are capable of making a contribution 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 considered to be previously developed will be undertaken.
- 87 Sites in the Green Belt that are not considered to be previously developed will be recorded in each authority's SLAA for comprehensiveness. However, these sites will not be considered suitable and will only be subject to a limited assessment. It is considered that, prior to any Green Belt Assessment undertaken by either Runnymede or Spelthorne which may or may not indicate whether Green Belt boundaries should be altered and would be subject to adoption through the Local Plan process, sites in the Green Belt that have not been previously developed are inappropriate. Whilst this policy constraint could be overcome by the removal of Green Belt designation, this is for any future Green Belt Assessment to make recommendations and for the Local Plan process to determine, not the SLAA, and to consider a site as 'suitable' ahead of any such assessment would be premature and give a false impression of land supply.
- 88 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. This will be determined on a case-by-case basis. In the case of Runnymede, in 2015, sites that have been 'reserved' for housing in previous Local Plans but remain undeveloped will be considered suitable.
- 89 Neither Council are anticipating there to be any rural exception sites over the Plan period. In the case of Spelthorne there are no areas of the Borough which would qualify for a rural exception and only very limited locations that may in Runnymede. However, should sites come forward that could qualify as a rural exception, these will be considered suitable in Green Belt locations provided they are located adjacent to or are well related to existing rural settlements.

⁷ As defined in annex 2 of the NPPF.

Flood Risk

- 90 Whilst flood zone 3b is considered to be an absolute constraint, sites within other lower risk flood zones can be considered suitable based on their vulnerability. As highlighted in paragraphs 34 & 38 of this methodology, a significant proportion of land in Runnymede and Spelthorne lies in flood zones 2 or 3.
- 91 The PPG note *Flood Risk & Coastal Change* classifies residential development (use classes C2, C2a, C3 & C4) as 'more vulnerable' and is considered to be acceptable in flood zone 2 subject to the sequential test first being passed and acceptable in flood zone 3a subject to the sequential and exceptions tests being passed. As such, sites within flood zones 1, 2 & 3a would be considered suitable on this basis.
- 92 Pitches for Gypsies & Travellers and plots for Travelling Showmen are considered to be highly vulnerable and would not be acceptable in flood zone 3a. However, 'highly vulnerable' uses are acceptable in flood zone 2 subject to the sequential and exception tests being passed and as such pitches/plots or sites for Gypsies & Travellers or Travelling Showmen could be suitable in flood zone 2.
- 93 Economic uses (use Class A or B with the exception of drinking establishments) and Leisure uses (Class D2), are classified as less vulnerable and are acceptable in flood zones 2 and 3a subject to the sequential test first being passed and are therefore considered to be suitable.
- 94 If a site is partially located in a higher risk flood zone for which the exception test cannot be passed, only that part of the site in a lower risk zone will be acceptable and therefore considered suitable (more information can be found in [Table 2: Flood risk vulnerability classification](#)⁸ and [Table 3: Flood risk vulnerability and flood zone 'compatibility'](#)⁹ of the PPG). It will also be made clear in the site assessments where the sequential and/or exception tests will need to be passed to overcome the constraint.
- 95 It should be noted that the Environment Agency (EA) is consulted on all planning applications that propose new housing development on sites within 20m of a main river and zones 3a and 3b (unless the development proposed is so minor [i.e. small extensions] that it would fall under the scope of the Environment Agency's standing advice). Both Runnymede and Spelthorne Councils are diligent not to grant planning permission for housing on any sites contrary to EA advice. This is supported by both Councils' monitoring data, which shows that in recent years, the Councils have not approved any schemes in flood zone 3 that have received sustained objections from the EA.
- 96 For the next SLAA, in the absence of either Council yet carrying out the strategic sequential test that is required to support the Local Plan process when identifying suitable allocations, it would be a matter for any submitted planning application to specifically consider whether the sequential test (and exception test) has been passed. As such, it is only sites that have already received planning permission in flood zones 2 and 3 and/or are reserved for housing that will appear in the housing trajectory.

⁸ http://planningguidance.planningportal.gov.uk/blog/guidance/flood-risk-and-coastal-change/flood-zone-and-flood-risk-tables/table-2-flood-risk-vulnerability-classification/#paragraph_062

⁹ <http://planningguidance.planningportal.gov.uk/blog/guidance/flood-risk-and-coastal-change/flood-zone-and-flood-risk-tables/table-3-flood-risk-vulnerability-and-flood-zone-compatibility/>

- 97 In future SLAAs, a Strategic Sequential Test will have been completed as part of the Strategic Flood Risk Assessment, which will provide evidence to support land allocations in both Local Plans. At that stage, sites in higher flood zones may be considered acceptable for development and appear in the housing trajectory even where planning permission has not been secured.

River Thames Scheme (Datchet to Teddington) Safeguarding Areas

- 98 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.
- 99 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.
- 100 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

- 101 Surrey County Council is the Local Planning Authority for waste and minerals. Paragraph 143 of the NPPF requires LPAs to:

'define minerals safeguarding areas and adopt appropriate policies in order that known locations of specific minerals resources of local and national importance are not needlessly sterilised by non-mineral development, whilst not creating a presumption that resources defined will be worked; and define Minerals Consultation Areas based on these Minerals Safeguarding Areas...set out policies to encourage the prior extraction of minerals, where practicable and environmentally feasible ...set out policies to encourage the prior extraction of minerals, where practicable and environmentally feasible, if it is necessary for non-mineral development to take place'.

- 102 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...'

- 103 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.

104 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)¹⁰ and policy DC1 of the Surrey Waste Plan (2008)¹¹.

105 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 protocol¹² 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

106 Paragraph 112 of the NPPF states that '*Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality*'.

107 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 give consideration to 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

108 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 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

¹⁰ 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>

¹¹ Surrey Waste Plan (2008). Available at: <http://www.surreycc.gov.uk/environment-housing-and-planning/minerals-and-waste-policies-and-plans/surrey-waste-plan>

¹² 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

109 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.

110 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

111 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

112 Runnymede will be publishing an Open Space Study (OSS) in 2016. Spaces identified in the OSS should be considered a significant constraint to development unless the OSS demonstrates the land is surplus to requirement, or the provision could be replaced (NPPF paragraph 74).

Spelthorne Specific Constraints Affecting Suitability

Heathrow Airport Noise Contours

113 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 taken into account in future iterations of the SLAA when these occur and as such, sites within or on the 66Leq contour will not be excluded.

114 Policy BE22 of Runnymede's Local Plan sets out that parts of the north of the borough are affected by airport noise and those locations where noise reaches 60Lq or more, residential development should be constructed to provide attenuation of a minimum 20dB. However, policy BE22 is not a constraint to development and therefore does not affect the suitability of a site.

Other Considerations Affecting Suitability or Capacity

115 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 taken into account on a site by site basis and treated in

accordance with saved policies in the adopted Runnymede 2001 Local Plan or Spelthorne Core Strategy & Policies DPD 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?

- 116 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.
- 117 The PPG advises that *'consideration should 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 20])). 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.
- 118 Where either authority identify 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?

- 119 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.
- 120 When estimating a site's potential, regard will need to be had to the joint Runnymede & 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.
- 121 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 as well as the DMP on whether the sites would still prove developable at lower yields or for different uses.

Housing Densities & Accessibility

- 122 The PPG says that LPAs should utilise the information that is contained within adopted policy or else look at past delivery by looking at relevant existing development schemes in order to justify the housing density being applied to a SLAA site assessment. Runnymede Borough Council does

not have any up-to-date adopted policy in this regard, and research shows that historically within the Borough's urban areas, residential development has previously occurred at an average of 18 dwellings per hectare. Moving forward, for urban area sites in Runnymede (this may in the future include sites that are currently located in the Green Belt but which are returned to the Urban Area through the Local Plan process), in order to ensure the best use of land released for housing, and to achieve sustainable growth in the Borough, it is considered that development will be required to be delivered at a higher density.

123 This is because whilst the NPPF does not prescribe density standards, when trends in planning policy are looked at over time, PPG3 which was published in 2000 encouraged housing development to be built at between 30 and 50 dwellings per hectare (dph). The Surrey Structure Plan (2004) sought to achieve an average density across all completed housing developments of at least 35 dph, with a density of at least 50 dph being aimed for in town centres. The South East Plan 2009 contained a regional target of 40 dph in policy H5. This reflects the trend over time in national and regional planning policy to increase the density of development.

124 As such, in the Runnymede SLAA, density will need to be assessed on a site by site basis to consider where higher densities can be achieved. However as an absolute minimum housing density of 30 dph will apply to all sites as a starting point. This is in general accordance with DCLG data on housing densities¹³.

125 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; however, as for Runnymede, density will be considered on a site by site basis and the policy will be used as a minimum.

126 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.

127 For previously developed sites in the Green Belt, the density will be governed by the need to comply with the 6th bullet point of paragraph 89 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 and the purpose of including land within it than the existing development. 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.

128 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 NOx in certain areas of the Borough.

¹³ Land use change statistics in England: 2013/14

- 129 Any sites put forward for consideration in the AQMAs will need to be considered in line with the requirements of paragraph 124 of the NPPF and should have regard to Runnymede's Air Quality Action Plan, 2014¹⁴ and Spelthorne's Air Quality Action Plan¹⁵.
- 130 It is hoped that each DMP 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.
- 131 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 reserve 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.
- 132 Appendix 2 contains the drafted officer site assessment form that will be completed for sites and together will form a site book that will be based on the research undertaken for these sites in accordance with the above steps.

Stage 3: Windfall assessment (for residential development)

- 133 Windfalls are sites that have not been previously identified and which are usually first encountered as development sites when a planning application is submitted (or when pre-application discussions have taken place). For Runnymede, windfalls are usually small-scale development (4 net units or less) and in Spelthorne sites of 0.4ha or less. Given each authority takes account of windfalls differently it is proposed that this is one area of the SLAA where the methodology will diverge, although future iterations may change this. The current approach of each authority to windfalls for the purpose of the SLAA is set out below.

Runnymede

- 134 As in previous years, the supply calculation in the housing trajectory will include an allowance for windfalls in the five year housing land supply as the Council can demonstrate that windfall development has consistently formed a significant part of the housing supply in Runnymede and is likely to continue to do so. This is evident through analysing the previous SHLAAs and looking at historic windfall delivery rates. This approach to windfalls is deemed to be consistent with paragraph 48 of the NPPF. Back garden developments will be excluded from the calculation, in line with the NPPF.
- 135 The windfall figure will be derived from averaging housing delivery from sites under 5 net units, over the preceding 5 years. To date, Runnymede has not seen a significant fluctuation in the amount of windfall sites coming forward in recent years (previously for net 1-9 units; however to comply with the PPG, the windfall figure has been reduced), and there is no evidence to suggest a downward trend, despite difficult current national economic circumstances. However, to reflect that over time, less land will be available to develop on a small scale, in years 6-15, the

¹⁴ Runnymede Air Quality Action Plan, 2014 <https://www.runnymede.gov.uk/CHttpHandler.ashx?id=5497&p=0>

¹⁵ Spelthorne Air Quality Action Plan, 2005 <https://www.spelthorne.gov.uk/article/2108/Air-quality---latest-reports>

annual windfall figure calculated in the SLAA will be reduced by 20% (which is in line with the Inspector's recommendations in appeal APP/Q3630/A/13/2192120 at Wick Road).

Spelthorne

136 In Spelthorne the supply calculation in the housing trajectory does contain an element of windfalls (sites less than 0.4ha) but an estimate of windfalls is not included within the 5 year housing land supply figure. This is because Spelthorne has consistently demonstrated that windfalls are not required to meet the 5 year housing land supply target.

137 Spelthorne's windfall calculation is based on the average completion of windfalls over the past 7 years. This average figure is included within the housing trajectory from year 4 onwards, but not within years 1-3. Small sites of less than 0.4ha in years 1-3 are based on existing commitments with no additional provision made for windfalls. All windfall estimates have included a notional 10% discount to allow for the exclusion of garden land from the definition of previously developed land.

138 In order to ensure Spelthorne does not double count windfalls it will only include sites of less than 0.4ha which are under construction or with permission. Any site put forward which is less than 0.4ha and which does not benefit from permission or is under construction will not be considered in the SLAA, but an allowance will be made in years 6-15 for windfalls based on the average of the past 7 years' performance.

Sites without planning permission

139 When making an assessment of land availability, it is deemed appropriate to apply an under-delivery discount adjustment to sites that do not have an extant planning permission, in order 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 methodology¹⁶. It is also recognised that even sites considered to be deliverable will not always come forward as anticipated.

140 The exact 'discount' to apply to residential development delivery in Runnymede and Spelthorne will vary from year to year. One method for calculating the delivery adjustment will be to use the completion dates of developments of 1 or more net units using Council-held information. This will be compared with the planning applications that were granted permission three years prior to determine the % of development that has come forward in that time in order to determine the delivery rate in Runnymede and Spelthorne. This exercise can be conducted over a three year period to obtain a three year average of housing delivery.

Permitted Development

141 Since May 2013, premises in B1 (a) office use can change to C3 residential use without requiring planning permission, subject to prior approval covering flooding, highways and transport issues and contamination. In October 2015, this became a permanent change to permitted development rights. Likewise, since April 2014, buildings in A1 or A2 retail use or certain

¹⁶ 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 an the economic climate. An Inspector found the Core Strategy sound and the Council adopted it in July 2011. There are a number of other LPAs that have also implemented an under-delivery discount to housing delivery in their trajectories

agricultural buildings can be converted to C3 residential use, again subject to prior approval. More recently in April 2015, new changes to new permitted development rights have been introduced that allow B8 uses of a certain size to change to residential use as well as the introduction of certain sui generis uses to change to residential uses without requiring planning permission.

142 Three such applications were received by Runnymede in 2015 and four in Spelthorne, which did not require prior approval. It is not known at the current time whether these have been implemented.

143 Information held by Runnymede Borough Council demonstrates that as at 30th April 2015, only five prior approval schemes have been implemented in Runnymede under the prior approval mechanisms discussed above. All of these have been through the conversion of B1(a) premises to C3 residential units. This has resulted in a net increase of 30 residential units over the relevant 2 year period (assuming that the applicants have pursued the same internal layouts as shown in their applications).

144 In Spelthorne, as at 31st March 2015 the number of prior approval schemes implemented since the introduction of the changes to permitted development is 19 proposing a total of 201 residential units. So far 3 of these schemes have been completed and a further 5 have been implemented. Since the 31st of March a further 3 schemes have been submitted for prior approval with a total of 92 units. As for Runnymede all prior approval schemes have involved the conversion of Offices to residential.

145 Although the introduction of these changes to permitted development can therefore be shown to have had a fairly limited contribution in Runnymede (generating on average 15 units per annum) and Spelthorne, prior approvals are still capable of increasing the delivery of windfall sites and will need to be factored in when preparing the housing trajectory.

Student accommodation and accommodation for older people

146 In accordance with the PPG, the contribution arising from purpose-built student accommodation was considered within the Runnymede SHLAA for the first time in 2014 and will also be included in this year's housing trajectory. The PPG advises that, in dealing with student housing, local planning authorities should consider the amount of accommodation purpose-built accommodation releases in the housing market.

147 In making an assessment of the amount of market housing that may be released by purpose-built student accommodation, officers at RBC have looked at the growth planned at Royal Holloway University of London (RHUL). If the growth in student numbers predicted is greater than the number of new bed spaces that are proposed, then it is unlikely that any HMOs will be released to market housing and zero will be applied to the five year supply. However, if the growth in student numbers is less than the number of new student bed spaces provided, then it is likely that HMOs could be released to market housing.

148 RHUL's long-term Masterplan for development up to 2031 was granted outline planning permission in 2015. The number of new bedspaces proposed in the outline application was 2650. The number of students proposed up to 2031 is 12000, which is a growth of an estimated 3000 from 2015. These figures highlight that the number of additional students predicted is

larger than the number of bedspaces proposed, and therefore, it is unlikely that any student houses in multiple occupation will be released to market housing.

- 149 As with student accommodation and in accordance with the PPG, 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.
- 150 It is proposed this will be achieved by contacting older people's accommodation providers and the Council's SHMA consultants and determining from these sources the types of occupiers of purpose-built accommodation (single householders or couples) and if they hold information as to the type of accommodation the occupiers have vacated and the number of households that have moved to C2 accommodation in Runnymede.

Conclusions on site assessments

- 151 Detailed site assessment 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.
- 152 When considering the viability of sites, both authorities will cross-reference information provided by the site promoter and a selection of sites or site typologies appraised by their DMP, as well as any evidence of viability through Community Infrastructure Levy (CIL) charging schedule preparation.

Stage 4: Assessment review

- 153 For 2015, the latest housing projections may be used to determine whether or not either Council has a five-year supply of housing sites. In 2016, both Councils will have had the opportunity to consider the OAN as evidenced in the SHMA and how the requirement will be considered by Runnymede and Spelthorne to identify an annual figure contained in their respective Local Plans. This will help each authority to assess whether there is a five year housing land supply.
- 154 After the sites submitted have been assessed for their development potential, if it is considered that sites identified as suitable and achievable in either Council's SLAA cannot meet the housing requirements, along with the Reserve Housing sites identified in Runnymede's Local Plan 2001 that have come forward for development, the PPG advises in respect of housing that it may be necessary to plan how this shortfall should best be managed.
- 155 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.

156 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
- For Runnymede, consider release of its remaining reserve sites that have not yet come forward
- 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

157 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 31st March. By the time of publication, the deliverability and yield of some sites may vary.

158 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

159 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.

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

- 161 The SLAA evidence will inform any necessary Duty to Cooperate discussions in regard to identifying land to meet the development needs of Runnymede and Spelthorne over the Plan period.
- 162 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.
- 163 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: Proforma

Site Assessment Pro- forma

This form will help to identify potential housing and economic sites as intended by 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 31st March 2029. **A separate form should be filled in for each site and include a site plan clearly showing the boundaries of each site.**

For sites that have been submitted previously (Runnymede only), please include the site ID (if known) and details of any changes since the previous SHLAA was published. Please include a map of the site if it has not been submitted to the 2014 SHLAA showing site boundaries (or if you are seeking an amendment to an existing site boundary).

Please note that 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:

This form is available electronically on the Council's website at www.runnymede.gov.uk or www.spelthorne.gov.uk. Alternatively, please telephone Runnymede on 01932 42 5267 or email planningpolicy@runnymede.gov.uk or telephone Spelthorne on 01784 446345 or email planning.policy@spelthorne.gov.uk for paper copies.

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 SHLAA?	Yes <input type="checkbox"/> No <input type="checkbox"/>	SHLAA ID (if applicable):
Location		
Please tick one as appropriate	Previously developed land ¹⁷	Not previously developed
Urban	<input type="checkbox"/>	<input type="checkbox"/>
Green Belt	<input type="checkbox"/>	<input type="checkbox"/>
Surrounding Details		
Land Uses		
Character of Surrounding Area		

¹⁷ Defined in Annex 2 of the National Planning Policy Framework 2012

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?				
Housing types (if known)	1 Bed	2 Bed	3 Bed	4 Bed+
Number of proposed Houses / Units				
Number of Houses / Units to be demolished				
Expected density (Dwellings per hectare)				
Would you consider making the site available for other residential uses (traveller site, student accommodation, accommodation for older people)?	Yes <input type="checkbox"/> No <input type="checkbox"/> 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, employment, retail, leisure)?	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?	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	
Is there any other information you feel is relevant?	

If the site is in Runnymede, please complete this form and post to the **Policy & Strategy Team, Runnymede Borough Council, Civic Centre, Station Road, Addlestone KT15 2AH** or email it to planningpolicy@runnymede.gov.uk

If the site is in Spelthorne, please complete this form and post to **Planning Policy & Implementation, Spelthorne Borough Council, Knowle Green, Staines-upon-Thames, TW18 1XB** or email to planning.policy@spelthorne.gov.uk

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 do 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. At this present time all planning applications are being assessed according to the adopted development plan. In Runnymede this is the Runnymede Borough Local Plan Second Alteration (2001) (saved policies), the Surrey Minerals Plan 2011 and Aggregates Recycling Joint Development Plan Document (2013) published by Surrey County Council and policy NRM6 of the South East Plan (SEP). As well as the waste and minerals plans and Policy NRM6 of the SEP, in Spelthorne this is the adopted Core Strategy & Policies DPD (2009), Allocations DPD (2009) and saved policies from the 2001 Local Plan.

The Councils accept no liability for any costs, liabilities or losses arising as a result of the use of, or reliance upon, the contents of this report.

Appendix 2: Officer Site assessment form

Name, location

ID

Site Area (ha)

(Road map, aerial map and key)

Ownership type	
Site description	
Planning status	
Planning History	RU.XX/XXXX
Current use?	
Previously developed?	

Site constraints			
Green Belt		Ancient woodland	
Flood zone 2		TPO	
Flood zone 3a		SSSI	
Flood zone 3b		SNCI	

Within 5 km of TBH SPA		LNR	
Within 5 km-7km of TBH SPA		Nationally listed buildings	
Conservation area		Other (specify)	

Potential Use	Owner willing to consider use?	No units/ m2	No spaces	Supporting comments
Housing, e.g. market housing with a proportion of affordable housing				
All affordable housing				
Elderly people's housing, student halls				
Traveller accommodation				
Starter homes				
Employment (B1 use classes)				
Employment (B2 and B8 use classes)				
Retail				
Food and drink				
Leisure				
Community uses				
Hotel				
Custom build				
Self-build				

(For housing)

Suitable: *(insert comments)*

Deliverable

Available: *(insert comments)*

Developable

Achievable: *(insert comments)*

Recommendation (e.g. housing/mixed use and if/when likely to be developed)

Left Intentionally Blank

বাঙলা

আপনি যদি ইংরেজি পড়তে বা বলতে না পারেন, ও এই লেখাটি পড়তে যদি আপনার কোনও সাহায্য লাগে তাহলে অনুগ্রহ করে 01483 750548 নাম্বারে উইটস্ লিঙ্কলাইন (WITS Linkline)-এর সাথে যোগাযোগ করুন ও আপনার নিজের ভাষায় একটা মেসেজ রাখুন।

Italiano

Qualora non siate in grado di leggere o di parlare l'inglese, e necessitate assistenza che vi permetta di capire il presente documento, siete pregati di contattare la WITS Linkline allo 01483 750548 e lasciare un messaggio nella vostra lingua.

Polski

Jeżeli nie potrafisz czytać lub mówić po angielsku i potrzebujesz pomocy w zrozumieniu tego dokumentu, proszę skontaktować się z Linją Telefoniczną WITS pod numerem 01483 750548, zostawiając wiadomość w języku ojczystym.

简体中文

如果您无法阅读或说英语，需要协助以明白此文件，请与和景翻译服务处之语言专线联络 01483 750548，并用您的母语留下讯息。

اردو

اگر آپ انگریزی زبان پڑھ اور بول نہیں سکتے ہیں اور آپ کو اس دستاویز کو سمجھنے میں دقت پیش آتی ہے؛ تو برائے مہربانی سے وٹس لنک لائن کو اس نمبر 01483 750548 پر رابطہ کریں اور اپنی زبان میں اپنا پیغام چھوڑیں۔

Español

Si no puede leer o hablar ingles, y necesita ayuda para entender este documento, por favor contacte a WITS Linkline al 01483 750548 y deje un recado en su idioma.

All enquiries about this paper should be directed to:

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

Tel 01932 838383

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2015

