

Contents

Background	2
Runnymede Borough Council: Spatial portrait	4
Spelthorne Borough Council: Spatial portrait	5
SLAA Methodology	6
Producing the SLAA	6
Stage 1: Identification of sites and broad locations	8
Stage 2: Site / broad location assessment	10
Step 1: Estimate the development potential of a site	11
Step 2: Assess the suitability of the site	11
Step 3: Is the site available?	18
Step 4: Is the site achievable?	18
Stage 3: Windfall assessment (for residential development)	20
Sites without planning permission	21
Permitted Development (PD)	21
Student accommodation and accommodation for older people	22
Stage 4: Assessment review	23
Stage 5: Final evidence base	24
Appendices	26
Appendix 1: Example of a Proforma	26

Background

National planning policy and guidance

1. The Government aims to ensure there is enough land available for the delivery of new homes. Section 5 of the National Planning Policy Framework (NPPF 2023) 'Delivering a sufficient supply of homes' states that 'Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment' (paragraph 69). The NPPF states (para. 61 and the glossary) that the number of homes identified as being needed is to be calculated using "a local housing need assessment, conducted using the standard method in national planning guidance" - unless exceptional circumstances justify an alternative approach.
2. It is incumbent upon Local Planning Authorities (LPAs) to demonstrate, in accordance with paragraph 69 of the NPPF, that their planning policies 'identify a supply of specific, deliverable sites for five years following the intended date of [Local Plan] adoption and specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.
3. The NPPF and the accompanying Planning Practice Guidance (PPG) set out the purpose of a land availability assessment and the main steps that need to be followed to undertake these assessments. Paragraph 60 of the NPPF highlights the importance of having "a sufficient amount and variety of land can come forward where it is needed" "to support the Government's objective of significantly boosting the supply of homes".
4. However, paragraph 76¹ of the 2023 NPPF now states:
'Local planning authorities are not required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing for decision making purposes if the following criteria are met:
 - a) *their adopted plan is less than five years old; and*
 - b) *that adopted plan identified at least a five year supply of specific, deliverable sites at the time that its examination concluded.'*
5. In addition, paragraphs 77-79 provide further detail as to the circumstances as to when a 5YHLS should be provided / produced by Local Planning Authorities. Particularly, paragraph 76 states: In all other circumstances, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide either a minimum of 5 years' worth of housing, or a minimum of 4 years' worth of housing if the provisions in paragraph 226 apply.
6. Section 6 of the NPPF 2023 "Building a strong, competitive economy" requires local planning authorities to identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period.

¹ However, in relation to decision-taking, footnote 79 to paragraph 224 of the NPPF states: 'As an exception to this, the policy contained in paragraph 76 and the related reference in footnote 8 of this Framework should only be taken into account as a material consideration when dealing with applications made on or after the date of publication of this version of the Framework.'

7. 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.
8. The PPG (Housing and Economic Land Availability Assessment²) contains detailed guidance on how to produce an assessment of land availability. The purpose of an assessment is set out as being to identify “a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period.” Sites included in the Strategic Land Availability Assessment (SLAA) therefore need to be considered in terms of their suitability for development of several different uses.
9. Both Runnymede and Spelthorne Councils see the benefits of undertaking more comprehensive assessments of land and are therefore committed to undertaking SLAAs in accordance with the PPG, which states that ‘Plan-making authorities may carry out land availability assessments for housing and economic development as part of the same exercise, in order that sites may be identified for the use(s) which is most appropriate’. (paragraph 001). However, there is no requirement set out in the PPG for LPAs to identify a five-year supply of land for economic uses. Overall, each authority’s SLAA will consider sites including for the following types of development:
 - Residential – Use Classes C2 (residential Institutions) & C3 (dwelling houses, including sites for Gypsies, Travellers and Travelling Showmen)
 - Economic – All E use classes (business, shop, financial and professional services, café / restaurant, clinic health centres, gyms etc) B use classes (Industrial / Storage and distribution).
 - Mixed use developments comprising some of the above use classes.

Biodiversity Net Gain (BNG) – securing net gains in biodiversity through new development was introduced through the Environment Act 2021. It makes sure that habitats for wildlife are left in a measurably better state than they were before the development³. There are three ways a developer can achieve BNG:

1. They can create biodiversity on-site (within the red line boundary of a development site).
2. If developers cannot achieve all of their BNG on-site, they can deliver through a mixture of on-site and off-site. Developers can either make off-site biodiversity gains on their own land outside the development site, or buy off-site biodiversity units on the market.
3. If developers cannot achieve on-site or off-site BNG, they must buy statutory biodiversity credits from the government. This should be a last resort. The government will use the revenue to invest in habitat creation in England.

Suitable Alternative Natural Greenspace (SANG) – these are open spaces that are undergoing enhancements designed to attract more visitors by providing an enjoyable natural environment for recreation as an alternative to the Thames Basin Heaths Special Protection Area (SPA)⁴.

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

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

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

10. This joint SLAA methodology has therefore been written to be compliant with current national policy and guidance and local variations in the approach taken are justified in the text in chapter 2.

Housing Market Area and Functional Economic Area context

11. Runnymede Borough Council (RBC) and Spelthorne Borough Council (SBC) have been identified as being in the same Housing Market Area. As a result, in 2015 the two authorities jointly commissioned a Strategic Housing Market Assessment (SHMA) Report for the joint housing market area. However, as both authorities are at different stages in their Local Plan timetables, the SHMA has been updated separately for each authority but both authorities continue to work closely together.
12. Both authorities' SLAA reports are based on the same agreed joint methodology, first published in December 2015, updated in 2021 and again in this report.
13. Runnymede's FEA analysis work suggests that RBC falls into two FEAs, one facing north and including Spelthorne Borough Council and London Borough of Hounslow and the southern part of the London Borough of Hillingdon (due to the location of Heathrow Airport) and one facing south, including Woking and Elmbridge Borough Councils.
14. Spelthorne's FEA analysis identifies that the Borough shares its strongest economic links with Runnymede, Elmbridge and the London Boroughs of Hillingdon and Hounslow and together these authorities sit within a Heathrow-focused FEA.
15. It is clear from this analysis, that the HMA and FEA boundaries of both Boroughs overlap significantly. The Councils will therefore both continue to work with those LPAs identified in the HMA and FEA work on matters associated with housing and employment, as appropriate, as well as other Duty to Co-operate / Local Plan Alignment Test matters. The text below provides a brief outline of where each Council is with its Local Plan and its emerging evidence documents and provides a brief spatial portrait of both Boroughs.

Runnymede Borough Council: Spatial portrait

16. Runnymede lies in North West Surrey, 20 miles from Central London and benefits from a strategic location around the junction of the M25 and M3 motorways. Runnymede is a geographically small borough, particularly when compared with most of the other Surrey Authorities, measuring just eight miles from north to south. There are three main towns in Runnymede: Addlestone; Chertsey and Egham. There are also a few smaller local centres and villages in Runnymede. The Borough's strategic location combined with the quality of its natural environment make Runnymede an attractive place to live work and visit.
17. Approximately 74% (5,801 hectares) of Runnymede's total land area is designated Green Belt and land designated as Green Belt is subject to strict policies preventing inappropriate development.
18. Furthermore, primarily due to Runnymede's proximity to the River Thames, flooding is recognised as a particularly important issue in the borough particularly in the east.

Spelthorne Borough Council: Spatial portrait

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

Local plan position / evidence documents

24. Runnymede Borough Council (RBC) adopted the Runnymede 2030 Local Plan on 16th July 2020. The Runnymede 2030 Local Plan sets out the key planning policies which determine the location, scale and timing of new development in the Borough in the period up to 2030, including the spatial development strategy, allocations for housing, employment and retail development and protection of the environment. The Local Plan also contains a suite of planning policies against which planning applications in the Borough will be determined.
25. A review of the Runnymede 2030 Local Plan began almost immediately after adoption, but the review was subsequently put on pause in September 2022 due to uncertainty at a national level in relation to planning reforms. A meeting of the Council's Planning Committee on 28 June 2023, revisited the pause to the Local Plan Review and a high-level timetable for resuming work on the Local Plan, based around three potential options were discussed. Members elected to proceed with the option for preparing a plan under the new plan-making arrangements (expected to commence at the end of 2024).
26. Background evidence continues to be prepared to underpin the forthcoming Local Plan Review. The evidence produced to date is available to view on Runnymede Borough Council's website⁵.

⁵ <https://www.runnymede.gov.uk/planning-policy/review-runnymede-2030-local-plan>

27. Spelthorne Borough Council (SBC) adopted its Core Strategy & Policies DPD and a Site Allocations DPD in 2009. The SBC Core Strategy is no longer considered to be entirely up to date given the publication of the NPPF in 2012 and as such, SBC agreed to undertake a review of its Local Plan in September 2014. The review of the Local Plan is currently being prepared and was submitted to the Secretary of State for independent Examination on 25th November 2022. Information and documents relating to the Examination can be viewed on Spelthorne Borough Council's website⁶.

SLAA Methodology

28. This chapter sets out a nationally compliant approach for preparing the SLAA. The PPG (Housing and Economic Land Availability Assessment) sets out the current Government guidance on preparing an assessment of housing and economic land supply. The SLAA assessment should contain the following:
- Identification of sites and broad locations with potential for development;
 - Assessment of the development potential and suitability of identified sites; and,
 - Assessment of the likelihood of development coming forward (availability and achievability).
29. This methodology is based on the Government's recommended approach but interpreted locally. The PPG states that the SLAA assessment should identify all sites regardless of the amount of development needed and that sites with particular policy constraints should be included in the assessment for comprehensiveness. However, constraints must be clearly set out, including where they restrict development, and the assessment should consider what action would be required to overcome them.
30. As such, this methodology identifies a set of constraints which are considered to be absolute and some which affect a site's suitability. Absolute constraints are those which cannot be overcome and where a site can be automatically excluded from further assessment. The list of other constraints is not, nor is it intended to be, exhaustive. Other types of constraints typically relate to matters such as heritage, open space and ecological designations, and which will also need to be assessed on a site-by-site basis in terms of how they could affect the suitability or restrict the capacity of a site. These are constraints which could potentially be overcome by mitigation measures in some instances.
31. A few other issues are discussed in this SLAA methodology including the approach to student accommodation, housing for older people, permitted development and housing densities. The proposed approaches to these issues are set out later in this methodology.

Producing the SLAA

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

⁶ <https://spelthornelocalplan.info/>

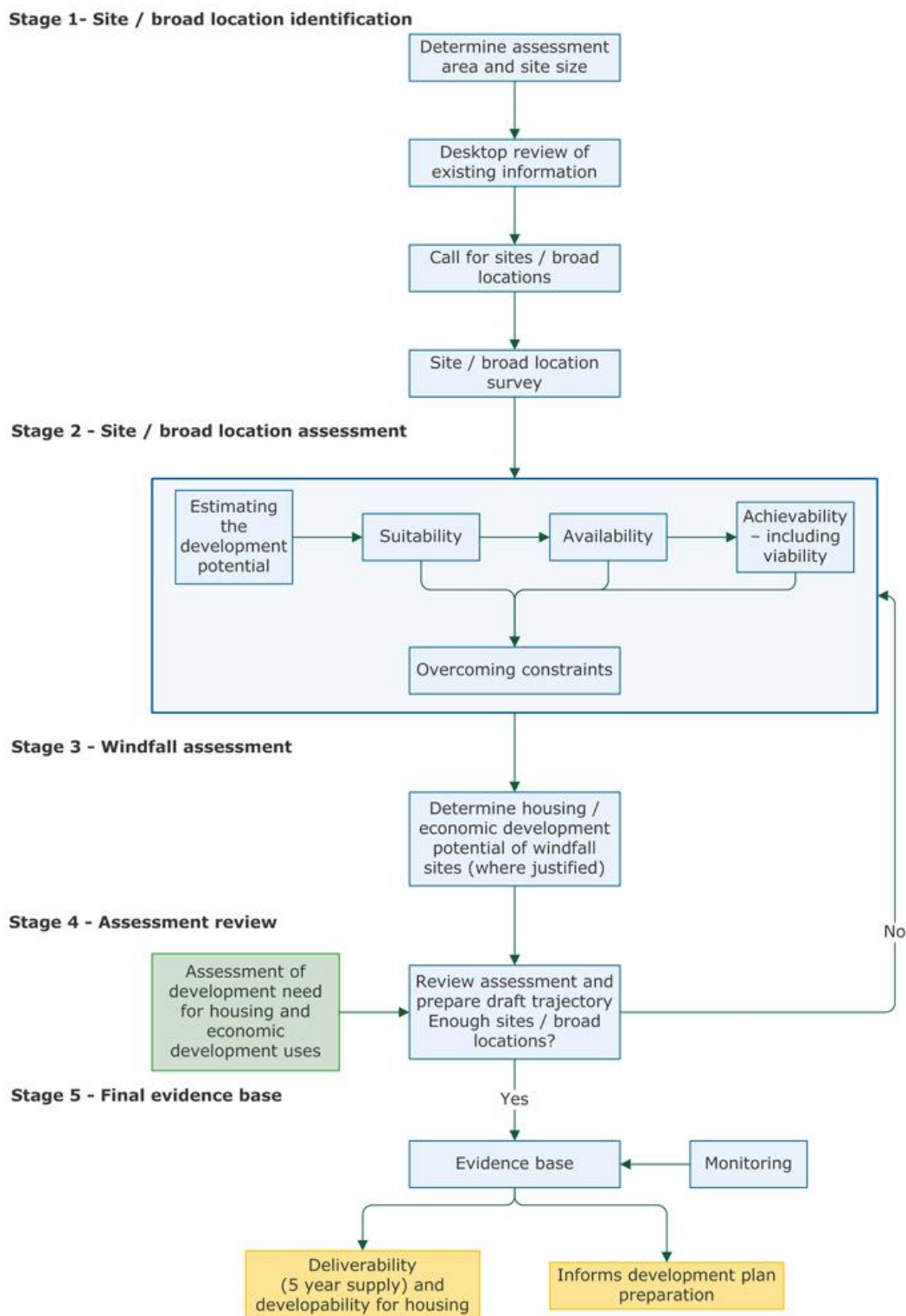


Figure 1: methodology flow chart taken from Planning Practice Guidance- Housing and economic land availability assessment.

Stage 1: Identification of sites and broad locations

33. The SLAA will assess the potential for housing and economic sites. For housing, only sites with a potential development capacity of five or more net housing units will be included and for economic sites, only those of 500m² floorspace or more or site size of 0.25 hectares or more will be included in the assessment. This approach is considered consistent with the PPG.
34. Alongside identifying sites for residential and employment uses, sites will also need to be found to enable the provision of a suitable quantum of Biodiversity Net Gain (to ensure that, where required, off-site provision and enhancements can be made), as well as enough SANG to provide enough alternative sites so that people avoid using the SPA heathlands.
35. The list of sites considered through each authority's SLAA should not be considered an exhaustive list of sites which will come forward for development in the HMA (although it is anticipated that most sites will come forward via a call for sites exercise). Other sites brought to either Council's attention or sites / opportunities which each authority has identified themselves may also be assessed. If a site is submitted after the close of a call for sites exercise, it may not be able to be considered in the next iteration of the SLAA (which is likely to be published several months after the call for sites) but would be considered in the next published version beyond this.
36. The following sets out possible sources that could help identify potentially available sites in the boroughs, the majority of which are suggested by the PPG:
 - Sites submitted as part of previous consultation processes (such as Local Plan Consultation)
 - Previous 5-year housing land supply
 - Valuers' department and / or other Council departments for Council-owned land
 - Existing housing / economic development allocations
 - Redevelopment / redesign of existing residential / economic areas
 - Sites subject to Section 106 Agreements
 - Planning applications refused, withdrawn or lapsed
 - Unimplemented / outstanding planning permissions for housing
 - Sites with planning permission for housing that are under construction
 - Pre-application discussion that is not considered confidential (and agreed by applicant)
 - Survey of local land agents' listings to consider the suitability of any plots of land for sale, review of redundant offices / commercial land.
 - Ordnance Survey maps and aerial photography
 - Register of public sector land
 - Neighbourhood Plan Forums (Runnymede currently has four Neighbourhood Fora but there are not currently any in Spelthorne)
 - Data from key statutory bodies (such as Surrey County Council, water companies, Network Rail etc)
 - Vacant and derelict land and buildings and business requirements
 - Development Management officer knowledge
 - Engagement with the development industry (for example via a Call for Sites exercise) and Community Planning Panel (Runnymede) and targeted engagement with the community (Spelthorne).

37. The PPG (Housing and Economic Land Availability Assessment) advises that effective planning for an assessment of land availability must involve cooperation with relevant bodies and key stakeholders in line with the duty to co-operate (/ Local Plan Alignment Test requirements). Runnymede and Spelthorne previously consulted duty to co-operate parties, the development industry and general stakeholders on a draft version of the SLAA methodology in September/October 2015 and December 2021. The views expressed during those consultations were considered in updating the methodology.
38. Duty to Cooperate / Local Plan Alignment Test partners and targeted stakeholders from the community and the development industry will be contacted to review the changes proposed to be made in this updated SLAA methodology.
39. Both Councils will contact agents / landowners on their land availability assessment databases and will inform everyone on their policy and strategy consultation databases, alerting them to the call for sites exercise. Information regarding the call for sites will be made available on the respective Council's websites. If no response is received from a promoter of a site previously submitted during the call for sites exercise, after two years of the site not being promoted, it will be removed from the SLAA if through previous site assessment it has been determined as not being capable of delivering development. If a site has been assessed as being capable of delivering development in the past, officers will seek to contact the agent or owner again and if necessary, search on the land registry. The site may continue to be included in the latter stages of the Local Plan (years 11-15) until its availability can be determined.
40. The above exercises will help both Councils determine what land is available for development and the sites that are considered deliverable and will form part of the five-year housing land supply (including the supply of traveller sites).
41. It will also need to be checked whether sites identified in the previous iteration of the SLAA have been completed and should therefore be removed. It would be necessary for this exercise to be undertaken each time the SLAA is updated. If a site promoter's site has been developed (to the point of completion), then the contact details will be removed from the SLAA consultation database unless they are known to have other land interests in that respective Borough.
42. For remaining sites, it will need to be considered if they meet the definitions of 'deliverable' or 'developable' as contained in the NPPF. The definitions contained in the 2023 version of the NPPF Glossary⁷ are as follows:

Deliverable:

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

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

⁷ <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>

or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within 5 years.

Developable:

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

43. When assessed against these definitions, if a site had been considered previously to be 'developable' (i.e. coming forward in years 6-15) and has since gained detailed planning permission, in most cases, the site should then be considered as 'deliverable' (coming forwards in years 1-5).
44. When either Council conducts its call for sites exercise, promoters putting forward a site will be required to provide a certain amount of information to help assist in assessing the site. Appendix 1 shows the type of information that would be expected to be collected in a site proforma for site promoters to complete for each site submitted through the call for sites process.
45. The information provided should assist in carrying out a desk-based review of any submitted site to record the following site information:
 - Size of site (in hectares)
 - Its boundaries as shown on a submitted map / plan
 - Current use(s)
 - Surrounding land use(s)
 - Character of the area
 - Development progress (if relevant) or an indication of when the site will become available
 - Any physical constraints (such as access)
 - Legal constraints (including ownership issues)
 - 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
46. Further site assessment will be necessary for sites put forward for consideration, which have a reasonable prospect of being considered deliverable. This approach is consistent with the PPG (Housing and Economic Land Availability Assessment), which states that initial site surveys should be proportionate to the detail needed for a robust appraisal.
47. 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

48. After identifying possible sites, the next stage is to assess each site in detail for its development potential. Assessing a site's potential for development involves four main

steps. At all stages, Runnymede and Spelthorne will seek to identify solutions to overcome constraints where appropriate to allow sites to be potentially designated for housing / economic land (or other uses as appropriate) in line with Government guidance.

Step 1: Estimate the development potential of a site

49. 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.
50. For some of the larger SLAA sites, certain assumptions need to be made to assess their capacity. This has resulted, in some instances, in there being a range of potential housing figures for a site. It is proposed that in these instances, a mid-point in the range is taken until such time as more detailed master planning work is undertaken for that site. Further information in relation to densities is set out in the Housing Densities & Accessibility section below.

Step 2: Assess the suitability of the site

51. There are several reasons why a site is likely to be considered unsuitable for housing or other forms of development. Constraints that could apply to sites might make all or part of them unsuitable for development. Where sites are considered to be unsuitable either due to an absolute constraint or one which affects suitability, they will not be identified as deliverable, unless in the case of non-absolute constraints where it can be demonstrated that the constraint can be overcome.
52. 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.
53. 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.
54. The approach to how constraints will be considered when assessing the suitability of sites is set out below.

Runnymede & Spelthorne Absolute Constraints

Flood Zone 3b (Functional Floodplain)

55. The NPPF sets out that inappropriate development in areas at risk of all sources of flooding should be avoided by directing development away from areas at highest risk.

The PPG Note *Flood Risk and Coastal Change*⁸ sets out which types of developments are inappropriate within different fluvial flood zones based on their vulnerability. All development except for water compatible development or essential infrastructure which has passed the exception test is inappropriate in zone 3b (functional floodplain). As such, any site entirely within flood zone 3b will be excluded from the assessment.

56. 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.
57. 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

58. 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).
59. 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.
60. 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.

Additional absolute constraints in Runnymede

Suitable Alternative Natural Greenspace (SANGs)

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

Ancient Woodland

62. Through the Ancient Woodland Inventory carried out in 2011, several ancient woodland areas in Runnymede have been identified (and these have 15m buffer zones around them). These areas have a high level of protection and development on such areas should be ruled out unless exceptional circumstances can be demonstrated. This

⁸ <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

approach aligns with NPPF (paragraph 186(c)) and policy EE9 of the adopted Runnymede 2030 Local Plan.

Additional absolute constraints in Spelthorne

Public Safety Zone - Heathrow

63. 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

64. As already set out, a large proportion of the land across Runnymede and Spelthorne is designated Green Belt and both local and national policy heavily restricts development on such land unless there are very special circumstances to justify a departure from policy. Paragraph 230 of the 2023 NPPF states 'The policies in this Framework (published on 19 December 2023) will apply for the purpose of examining plans, where those plans reach regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre-submission) stage after 19 March 2024'.
65. This version of the NPPF states that 'Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process', in accordance with paragraph 145 of the NPPF.
66. Whilst both local and national policy severely restricts development within the Green Belt, this is a policy constraint that could be overcome through the preparation of a Local Plan, and as such is not an absolute constraint for the purposes of the SLAA. However, a distinction needs to be made between how sites which are previously developed and those that are undeveloped are assessed in the SLAA.
67. In accordance with the NPPF, previously developed⁹ sites in the Green Belt are capable of contributing to development needs through limited infilling or the partial or complete redevelopment of such sites (subject to the caveats in paragraph 154(g) of the NPPF) and are considered suitable for the purposes of this SLAA methodology. As such, a detailed assessment of sites in the Green Belt that are previously developed will be undertaken.
68. Where part of a site in the Green Belt is previously developed and the other part is not, only the area of the site considered to be 'previously developed' will be considered as suitable in the first instance. This will be determined on a case-by-case basis. Sites in the Green Belt that don't contain previously developed land will be subject to a two-stage assessment approach. This will involve the following:

⁹ As defined in annex 2 of the NPPF.

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

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

Garden centres

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

Flood Risk

70. Whilst flood zone 3b is an absolute constraint to development, sites within other lower risk flood zones can be considered suitable depending on the vulnerability of the use proposed. As highlighted above, a significant proportion of land in Runnymede and Spelthorne is at risk from fluvial flooding.
71. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere and, where possible, should reduce flood risk overall (NPPF para. 170). Sites identified as being at risk from any source of flooding (whether this be fluvial, groundwater, reservoir or surface water flooding) will only be considered suitable where it can be clearly demonstrated that the development can be made safe for its lifetime without increasing flood risk elsewhere.
72. Generally, in Runnymede, sites in flood zone 3a or which are found to be at risk from other sources of flooding will not be included within the 'deliverable' housing supply unless they have planning permission (and as such have demonstrated through this rigorous assessment process which includes consultation with statutory and other relevant consultees, that they can be made safe for their lifetime without increasing flood risk elsewhere). However, such sites could be included within the 'developable' supply i.e. from year six onwards, provided that the landowner undertakes suitable flood risk assessment and mitigation measures through the planning application process.
73. In relation to other sources of flooding, whilst this will need to be examined at the planning application stage, for the purposes of the SLAA, it is considered that it will not be possible to provide an in-depth analysis for individual sites. The Planning Practice Guidance states¹⁰ that 'During the site survey the following information can be

¹⁰ [Housing and economic land availability assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment) – see Paragraph: 015 Reference ID: 3-015-20190722

recorded... physical constraints (e.g. ... flood risk', but it does not specify or require that all forms of flood risk need to be assessed. Below is a summary of the other sources of flooding in both boroughs which may impact on the suitability of development on sites:

- Surface water flooding
- Sewer flooding
- Groundwater flooding
- Flooding from reservoirs
- Flooding from canals and other artificial sources

74. Developers / applicants are advised to consult the Strategic Flood Risk Assessment of each authority for more information about the different flood risk is in each borough. During the plan making process, a more detailed assessment of the different types of flood risk affecting each SLAA site will be considered as part of the Strategic Sequential Test.
75. In Spelthorne, sites in flood zone 3a can be included in the 'deliverable' supply i.e. years 1-5, so long as it can be demonstrated that flood risk can be overcome. This particularly relates to sites that have progressed within the planning system or have had detailed pre-application discussions, with detailed evidence available to support the position. Sites will otherwise be included in the 'developable' supply. Sites and the wider risk of flooding in Spelthorne will be assessed in further detail through the Spelthorne Strategic Flood Risk Assessment. This will consider the risk of all sources of flooding in the Borough and consider opportunities for flood management.

River Thames Scheme (Egham to Teddington) Safeguarding Areas

76. The River Thames Scheme is a proposed major infrastructure project that will reduce flood risk between Egham and Teddington. Part of the Scheme consists of a new river channel built in two sections - through Runnymede (between Egham Hythe and Chertsey) and through Spelthorne (between the River Thames at Laleham before meeting Littleton North Lake and upstream of Desborough Cut).
77. Whilst the exact location of the flood channels has not yet been determined, the EA has indicated broad areas which should be safeguarded.
78. As such, any site put forward within proposed safeguarded areas for the River Thames Scheme will not at this stage be considered suitable, although it will be acknowledged that the constraint could potentially be overcome once details of the final scheme are known. Therefore, for comprehensiveness, sites in the safeguarding area will not be excluded from the assessment.

Waste and Minerals sites

79. Surrey County Council is the Local Planning Authority for waste and minerals. Paragraph 216(c) of the NPPF requires LPAs to:

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

80. 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...'

81. Whilst safeguarded sites or allocations for minerals and waste are not absolute constraints, Runnymede and Spelthorne will discuss with Surrey County Council any assessment of sites submitted to the SLAA which fall within a mineral safeguarding area or may impact on both existing and allocated minerals and waste sites and infrastructure used for minerals development. Where a site is identified within an existing allocation for minerals or waste development (including aggregates recycling), the site will not normally be found suitable for housing or economic development, however for comprehensiveness it will not be excluded from the assessment.

82. 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)¹¹ and policy 7 of the Surrey Waste Local Plan 2019-2033¹².

83. 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 protocol¹³ 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

84. Footnote 62 to paragraph 181 of the NPPF states that 'Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.'

85. Consistent with this national policy approach, both authorities will seek to protect those agricultural sites that are of the best quality. This exercise has already been undertaken in Runnymede as part of the Green Belt Review. Therefore, when sites are submitted to the SLAA, any assessment made will need to consider the site's agricultural value 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.

¹¹ Surrey Minerals Plan Core Strategy (2011). Available at: <https://www.surreycc.gov.uk/land-planning-and-development/minerals-and-waste/minerals-core-strategy-development-plan>

¹² Surrey Waste Plan (2020). Available at: <https://www.surreycc.gov.uk/land-planning-and-development/minerals-and-waste/waste-plan>

¹³ 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

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

86. 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. For example, sites for economic purposes and C2 uses with high dependency residents may be considered suitable within the 400m buffer.

Biodiversity Buffer Zone

87. 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.
88. 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

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

Public open space

90. Runnymede published an Open Space Study (OSS) in 2017 whilst the Spelthorne Open Space Assessment was published in 2019. Spaces identified in these studies (or any future updates) should be considered a significant constraint to development unless it is demonstrated that the land is surplus to requirement, or the provision could be replaced (NPPF paragraph 103).

Spelthorne Specific Constraints Affecting Suitability

Heathrow Airport Noise Contours

91. Policy EN11 of the Spelthorne Core Strategy seeks to deal with the noise impact of Heathrow. The Policy seeks to refuse the development of new residential development where aircraft noise levels are at or exceed 66Leq. The 66Leq noise contour is shown on the Spelthorne Policies Map. As such, any site identified for net additional dwellings within or on the 66Leq noise contour will not be considered suitable. If a third runway at Heathrow Airport is implemented, this is likely to change the noise contours around the airport. Depending on the details of any noise mitigation proposed this could widen or narrow the contours around the airport. As such, any changes to the noise contours around the airport will need to be considered in future iterations of the SLAA when these occur and as such, sites within or on the 66Leq contour will not be excluded.

Other Considerations Affecting Suitability or Capacity

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

Step 3: Is the site available?

93. 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.
94. The PPG (Housing and Economic Land Availability Assessment) advises that *'consideration can also be given to the delivery record of the developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions'* (paragraph 19). It is also worth noting that although a site may have an extant planning permission, it does not necessarily guarantee the site is available as a party can make a planning application on a site even if they do not own it. Such factors will be considered on a site-by-site basis.
95. Where either authority identifies a site or opportunity which it considers could come forward or has potential, but there are questions about the site's availability, that authority will undertake land registry searches and write to the owners regarding site ownership and availability. If an owner indicates that they have no intention of releasing a site / land for development, then the site will not be included in the assessment. If a site owner indicates that the site could be developed now or at some point in the future, then the site will be assessed against the methodology criteria.

Step 4: Is the site achievable?

96. 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.
97. When estimating a site's potential, regard will need to be had to the latest Strategic Housing Market Assessment (SHMA) for the borough in question in terms of the size and type of dwellings which should be delivered on a site. Regard will also need to be had to the approach to density and accessibility, as set out below, and to any open space / playing space requirements.
98. Where assumptions of site yield made by officers' match those of the owner / agent, the site would be assumed to be achievable, but where there is conflict, officers should

attempt to obtain information from the landowner / agent on whether the sites would still prove developable at lower yields or for different uses.

99. It is anticipated that targeted consultations with developers / landowners etc will be able to assist officers in determining a realistic view of viability for a number of uses, dependent on what a given site is capable of delivering.
100. The final SLAA report will also include a site book showing maps of each of the SLAA sites together with a completed officer site assessment form completed in accordance with the above steps (containing the type of information set out in Appendix 1 to this report).

Housing Densities & Accessibility

101. The PPG states that LPAs can include locally determined policies on density but that when assessing development potential, plan makers should seek to make the most efficient use of land in line with policies set out in the NPPF (particularly paragraphs 129 and 130).
102. The adopted Runnymede 2030 Local Plan does not prescribe a set density for developments but instead sets out, in Policy EE1: Townscape and Landscape Quality, that all development proposals need to achieve high quality and inclusive design which responds to the local context while making efficient use of land.
103. Spelthorne has an adopted policy (Policy HO5) on housing densities in its Core Strategy & Development Policies DPD (2009) with densities ranging from 35-55dph in areas predominated by family housing and up to 75dph or above in Staines Town Centre. The Spelthorne SLAA will assess sites submitted as part of the call for sites in accordance with policy HO5, or where character permits, densities may be increased accordingly; however, as for Runnymede, density will be considered on a site-by-site basis.
104. 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.
105. For previously developed sites in the Green Belt, the density will be governed by the need to comply with paragraph 154 g) of the NPPF, which states that:
 - g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
 - not have a greater impact on the openness of the Green Belt than the existing development; or
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.
106. As such, a suitable density on these sites will need to be considered on a case-by-case basis.

107. As such, SLAA densities will need to be assessed on a site-by-site basis to consider a suitable density/density range for development. This assessment will be made in line with paragraphs 129 and 130 of the NPPF, any relevant local policies and any adopted Borough Design Codes.

Air Quality

108. Runnymede currently has two Air Quality Management Areas (AQMA) in place; one along the M25 and one at Addlestone Town Centre. Spelthorne has a single AQMA in place, which covers the whole of the Borough and was designated for exceedance of NOx in certain areas of the Borough.

109. Any sites put forward for consideration in the AQMAs will need to be considered in line with the requirements of paragraph 192 of the NPPF, relevant local plan policies and should have regard to Runnymede's Air Quality Action Plan¹⁴ and Spelthorne's Air Quality Action Plan¹⁵.

Stage 3: Windfall assessment (for residential development)

110. Windfalls are sites not specifically identified in the development plan. They are usually small-scale sites that are first encountered as development sites when a planning application / prior approval application is submitted.

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

Runnymede

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

Spelthorne

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

¹⁴ <https://www.runnymede.gov.uk/pollution/air-quality-1/3>

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

Sites without planning permission

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

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

115. This is far less detailed than the current definition set out in the 2023 NPPF Glossary which is as follows:

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

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

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

116. Due to the more recent definition of deliverability from the 2023 NPPF being more detailed than the 2012 version, with an emphasis on sites with planning permission, but more importantly, the emphasis in point b) of there being a need for ‘clear evidence’ that completions **will begin** [RBC emphasis] (compared to ‘clear evidence that schemes will not be implemented’ in the 2012 definition) for certain listed types of site within five years, the Councils will ensure that sites included in the 5YHLS trajectory meet the stricter tests of deliverability set out in the current definition. This will ensure that there is greater certainty that they will provide units within the five-year timeframe, but due to this, a discount will no longer applied, due to this greater certainty that the sites included will deliver the full number of units set out in the trajectory.

Permitted Development (PD)

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

118. From the starts of 2020 the Government made significant changes to town centre use classes. Those changes saw a whole host of uses – primarily offices, restaurants and shops, professional services and light industrial combined into one all-encompassing new category, class E.
119. The Government introduced legislation that from 1st August 2021 that allows buildings under use class E to convert to residential use (class C3) without the need for applicants to submit a planning application. In February 2024, the Government amended this element of permitted development (under class MA rights) which removed the previously existing 1,500sqm size limit for these applications as well as the three-month vacancy requirement. However, the building must still have been in commercial business and service use (class E) for two years before benefiting from the right.
120. There will be limited opportunities for local consideration by the local planning authority of specific planning matters through the prior approval process. These considerations include:
- Flooding
 - Impacts of noise from commercial premises
 - Provision of adequate natural light to all habitable rooms
 - In conservation areas only - consideration of the impact of the loss of the ground floor commercial, business and service use
 - Impact of the loss of health centres and registered nurseries on the provision of such local services.
121. Permitted development rights have had a significant impact in both boroughs since they were first introduced in May 2013. Not all prior approvals will necessarily be implemented, as some are likely to be speculative i.e. to see what value could be gained from the building if it were to be converted.
122. In September 2020 the Government agreed to make space standards mandatory for all homes in England built under permitted development rights. This means that from 6th April 2021 all permitted development homes will have to comply with the government's nationally prescribed space standards. This could well result in a reduction in the number of PD conversions taking place in the future, as it could become less advantageous for developers to make these conversions.
123. Nonetheless, PD conversions are likely to have a significant impact on increasing the delivery of housing sites in both Boroughs and as a result both housing trajectories will need to factor in this source of supply.

Student accommodation and accommodation for older people

124. Runnymede contains a high population of students who attend the Royal Holloway University of London (RHUL), an internationally recognised university located in the north of Runnymede Borough. The University has purpose-built accommodation for students both on and off campus.
125. The PPG (Housing Supply and Delivery) sets out that all student accommodation can, in principle, count towards an authority's housing land supply. In assessing the amount of market housing that may be released by purpose-built student accommodation, officers at RBC will consider the:

- Amount of accommodation that new student housing releases in the wider housing market (by allowing existing properties to return to general residential housing); and / or
 - The extent to which it allows general market housing to remain in such use, rather than being converted to student accommodation.
126. This approach will need to be applied to both communal establishments for students and to multi-bedroom self-contained student flats. The PPG sets out that authorities will need to base their calculations on census data and, consequently this approach will be used in the SLAA.
127. As with student accommodation and in accordance with the PPG (Housing Supply & Delivery), purpose-built housing for older people can contribute to a local authority's five-year supply calculation. As such, residential institutions within Use Class C2 will need to be considered and a figure of how much market housing is likely to be released by purpose-built older people's accommodation should be determined when producing the housing trajectory, based on data taken from the most recent Census.

Conclusions on site assessments

128. Detailed site assessments will not be undertaken for new sites regarding achievability and deliverability that have not been deemed 'suitable' and 'available' in earlier stages of the site assessment process. However, in subsequent years, if a site that had previously not been assessed in detail, later met the suitable and available criteria; a more detailed assessment would then be undertaken at such a time.
129. Runnymede Borough Council will invite comments on SLAAs prepared as part of Local Plan preparation process through the consultation stages. As such, the initial version of the document that is published is likely to be branded as an interim version and will be amended as appropriate following the consideration of comments from key stakeholders, including the development community.
130. Decisions regarding which sites might be allocated for development will be a matter for each authority's Local Plan process not the SLAA itself. Neither should it be construed that a site in the SLAA would necessarily be granted planning permission. As such, the SLAA acts as an audit of sites which could be brought forward for development but does not indicate whether a site would be allocated, or that planning permission would be granted.

Stage 4: Assessment review

131. The PPG states at paragraph 24¹⁶: 'Once the sites and broad locations have been assessed, the development potential of all sites can be collected to produce an indicative trajectory. This should set out how much housing and the amount of economic development that can be provided, and at what point in the future (i.e. within years 1 to 5, 6 to 10, and 11 and beyond). An overall risk assessment should be included setting out whether sites will come forward as anticipated'. However, in line with changes made in the 2023 NPPF, trajectories will only be produced in circumstances where the local planning authority is required to demonstrate a 5YHLS.
132. Local Housing Need (LHN) is an up-to-date assessment of housing need calculated in accordance with the Government's standard method. The assessment of deliverable

¹⁶ <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

sites i.e. those expected to come forward in the first five years can then be compared to the Local Housing Need (LHN) to help each authority to assess whether there is a five-year housing land supply (in circumstances where a 5YHLS is required to be produced by one or both of the authorities in line with NPPF requirements).

133. If it is considered that a shortfall exists between the LHN and the housing land supply, the assessment will firstly need to be revisited to see whether further sites can be found or changing assumptions about the development potential of particular sites will increase the supply. If there is still insufficient supply, the PPG (Housing and Economic Land Availability Assessment) advises in respect of housing that it may be necessary to plan how this shortfall should best be managed.
134. 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.
135. Any shortfall between housing and economic targets and the five-year supply of land will trigger the Council to undertake a potential number of steps to try and address the shortfall, which are as follows:
- Sites that have not been assessed in detail should be re-examined to establish whether they can be reconsidered dependent on, for example, the outcome of discussion with the landowner / agent on how they could overcome identified non-absolute constraints
 - Reconsider density and suitability assumptions
 - Investigate other housing and planning policy options that have the potential to increase the delivery of housing, for example consider the release of designated employment sites
 - Investigate smaller sites than that set out in the PPG
 - Broad locations for development may need to be re-considered, dependent on the evidence the Councils have collected.
 - Only should the above steps fail to address the shortfall, both Councils continue discussions with neighbouring Authorities, in particular those within the FEA and HMA in the first instance, as to whether they can meet any identified shortfalls, noting that contents of paragraph 60 of the NPPF which confirms that 'The overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community.'

Stage 5: Final evidence base

136. Both Councils will produce a housing trajectory in circumstances where the NPPF confirms that one is required (see paragraph 5 of this document). Trajectories will seek to illustrate the distribution of sites for different types of residential uses during the set year periods.
137. Each Council's final SLAA will consist of two documents:
- A **Report**, which details the SLAA assessment background, methodology and conclusions

- A **Site book**, showing each site to scale and including various physical constraints and officer assessment of the developable and deliverable nature of the site, including the type and estimated quantity of development. The Site book may be broken down into separate sections / documents to reflect different site typologies, sizes and phasing.
138. 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.
139. The assessment will be published on the relevant Council's website to ensure it is publicly available.
140. The SLAA evidence will inform any necessary Duty to Cooperate/Local Plan Alignment Test discussions regarding identifying land to meet any unmet development needs of Runnymede and Spelthorne over the Plan period.
141. 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.
142. During Local Plan development, each Council's SLAA will be updated on a regular basis in line with the PPG until such a time that sites have been allocated in either Council's adopted Local Plan. Following this point, in line with paragraph 79 of the NPPF, 'to maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission'. The Councils both do this on a continuous basis through their housing monitoring record keeping and report on it annually via the publishing of their respective Authority Monitoring Reports.

Appendices

Appendix 1: Example of a Proforma

Site Assessment Pro- forma

Pro-forma, similar to the one outlined below, should be used to help to identify potential housing and economic sites in the SLAA. Suggested sites should be able to accommodate at least 5 or more net dwellings, one traveller pitch/plot or accommodation for older people or students, or in the case of economic land, sites should be 0.25ha or greater in size (or have capacity for 500m² of floor space) with the view for development occurring by **YEAR XXX**.

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

Sites that have been submitted previously should include the site ID (if known) and details of any changes since the previous SLAA was published. A map of the site should also be submitted showing site boundaries (or amendments to an existing site boundary if previously submitted). All information provided may be made public apart from private email addresses and telephone numbers.

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

Your Details			
Name			
Organisation (optional)			
Address			
Postcode		Telephone number(s)	
E-mail address			
Landowner (please provide contact details)			
Please indicate in what capacity you are submitting the site details	Owner <input type="checkbox"/> Agent <input type="checkbox"/> 3rd party <input type="checkbox"/>	Contact details:	
Site Details			
Address			
Postcode		Site Area (Hectares)	
Brief description of site			
Current Land Use			
Site previously submitted to SLAA?		SLAA ID (if applicable):	

Location		
Please tick one as appropriate	Previously developed land¹⁷	Not previously developed
Green Belt		
Surrounding details		
Land Uses		
Character of Surrounding Area		
Constraints		
Policy Constraints (if known)		
Physical (access, steep slopes, potential flooding, location of pylons, protected trees, contaminated land, listed buildings etc.)		
Legal		
Land ownership		
Other		
What would be required to overcome the constraints identified that currently prohibit development on the site?		
Proposed Development		
Is the site currently in the planning process?	<p>The site has not been involved in the planning process <input type="checkbox"/></p> <p>There have been pre-application discussions about the site <input type="checkbox"/></p> <p>The site has a current or expired outline permission <input type="checkbox"/></p> <p>(please include application number if known) prefixed RU.</p> <p>The site has a current or expired full permission <input type="checkbox"/></p> <p>(please include application number if known) prefixed RU.</p>	
Is the site available now? If not, when is it expected to be available?		
Number of proposed Houses / Units		
Number of Houses / Units to be demolished		
Expected density (Dwellings per hectare)		
Indicative housing mix		

¹⁷ Defined in Annex 2 of the National Planning Policy Framework 2023

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

Disclaimer:

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

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

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

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

Appendix 2: Consultation on the Draft SLAA Methodology May – June 2024

Runnymede consulted on the draft updated SLAA Methodology between 15 May and 16 June 2024. During this period the Council welcomed any comments and suggested amendments to this document. The representations received are set out in the table below:

Name	Comments	Actions / amendments made to the methodology
Private consultancy	<p>We note that the Council (in association with Spelthorne Borough Council) is consulting on an updated version of the SLAA Methodology. The promoter of this site has previously commented on how green belt has been handled in previous versions of the Council's SHLA and this document from June 2021 is attached (unchanged) for completeness.</p> <p>We note paras. 68 and 69 of the draft updated methodology, and still have reservations about the attempt to inject a sequential approach to the consideration of sites on grounds other than the ability to promote sustainable development – something unsupported explicitly by national legislation or policy. However, and with reference to para. 69, it is clear that Runnymede Council does have to get on with its Local Plan review or replacement, and it is equally clear that the Plan will have to allocate for development sites that are currently in the green belt.</p> <p>Above all however, and noting the way the Councils have addressed such as recent changes to the Framework (December 2023) whichever party forms the administration in July 2025 new policy statements can be expected soon this year either taking forward the LURA or following through on the Labour Manifesto. The Council will have to address this forthcoming new policy context, something likely to further affect what the SHLA says or how it will be interpreted and applied. Rather than make detailed comment on the current 2024 draft methodology therefore, we will await how the Council adapts to whatever national policy context is coming and respond accordingly.</p>	No amendments made due to no specific adjustments being identified as being necessary to the approach / methodology in the submission made. The representation made raises issues / concerns but does make defined suggestions for amendments to the SLAA methodology.
National Highways	No comment.	N/A

Name	Comments	Actions / amendments made to the methodology
Natural England	No comment.	N/A
Transport for London	No comment.	N/A
Surrey County Council	No comment.	N/A

Four of the five representations made were 'no comment'. The other comment mainly related to the Council's approach to the assessment of Green Belt and its boundaries and did not request any specific changes were made to the SLAA methodology. Therefore, no changes to the methodology have been made to the draft methodology, which now becomes the final and adopted version.