



Planning Inspectorate

Report to Spelthorne Borough Council

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an Inspector appointed by the Secretary of State

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Planning and Compulsory Purchase Act 2004 (as amended)

Section 20

Report on the Examination of the Spelthorne Local Plan

The Plan was submitted for examination on 25 November 2022

The examination hearings were held between 23 May 2023 and 18 February 2025

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Abbreviations used in this report

BNG	Biodiversity Net Gain
BOA	Biodiversity Opportunity Areas
HRA	Habitats Regulations Assessment
LLFA	Lead Local Flood Authority
LPA	Local Planning Authority
NPPF	National Planning Policy Framework
SDF	Staines Development Framework
SLP	Spelthorne Local Plan
SNCI	Sites of Nature Conservation Importance
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Urban Drainage Systems
SWLP	Surrey Waste Local Plan
WHO	World Health Organisation

Non-Technical Summary

This report concludes that the Spelthorne Local Plan provides an appropriate basis for the planning of the Borough, provided that a number of main modifications [MMs] are made to it. Spelthorne Borough Council has specifically requested that I recommend any MMs necessary to enable the Plan to be adopted.

Following the hearings, the Council prepared schedules of the proposed modifications and, where necessary, carried out sustainability appraisal and habitats regulations assessment of them. The MMs were subject to two periods of public consultation both extending over a six-week period. I have recommended their inclusion in the Plan after considering the sustainability appraisal and habitats regulations assessment and all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- The introduction of an Immediate Partial Review Policy ST3;
- The deletion of a number of site allocations to take into account of flood risk that cannot be mitigated;
- Revision of flood risk policy E3 to take account of national guidance; and
- Updating the Housing Trajectory to reflect revisions in site allocations;
- Adding, amending or deleting policies and explanatory text to guide development;
- Updating Policy requirements in relation to a number of site allocations to ensure each Policy wording is clear, precise, and effective; and
- A number of other modifications to ensure that the plan is positively prepared, justified, effective and consistent with national policy.

Introduction

1. This report contains my assessment of the Spelthorne Local Plan (SLP) in terms of Section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is compliant with the legal requirements and whether it is sound. The National Planning Policy Framework 2021 (paragraph 35) (NPPF) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The Plan was submitted for examination on 25 November 2022. An updated NPPF was published on 5 September 2023, followed by further revisions in December 2023 and December 2024. The September 2023 update introduced a limited set of targeted amendments to the July 2021 NPPF, primarily aimed at facilitating onshore wind development. Therefore, unless stated otherwise, any references to the NPPF in this report relate to the September 2023 version¹.
3. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Spelthorne Local Plan, submitted in November 2022 is the basis for my examination. It is the same document as was published for consultation between 15 June – 21 September 2022.

Main Modifications

4. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2** etc, and are set out in full in the Appendix.
5. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out Sustainability Appraisal and Habitats Regulations Assessment where required. This schedule was published for a six-week public consultation. A further schedule of proposed MMs was then prepared, and Sustainability Appraisal and Habitats Regulations Assessment were likewise undertaken as necessary, before it too was consulted upon for six weeks. I have taken the consultation responses into account in reaching the conclusions set out in this report.

¹ September 2023 NPPF paragraph 1, footnote 1.

Policies Map

6. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as Pre-submission Spelthorne Local Plan 2022 – 2037 – Policies Map (Nov 2022 update) as set out in CD002 and CD003.
7. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are effective.
8. These further changes to the policies map were published for consultation alongside the MMs in the Atlas of Changes – CD047.
9. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in the Pre-submission Spelthorne Local Plan 2022 – 2037 – Policies Map (Nov 2022 update) and the further changes published alongside the MMs in the Atlas of changes.

Context of the Plan

10. Spelthorne Borough, situated on the edge of Greater London, has a population of approximately 103,000 and is home to more than 7,500 businesses. Covering around 19.75 square miles, the Borough marks the point where London's continuous urban landscape transitions into a more fragmented pattern of Surrey towns and villages. Its location provides strong transport connectivity to London and the wider South East, supporting its suitability as a place for both residential and employment uses.
11. Approximately 35% of the Borough is urbanised, while the remaining 65% is designated as Green Belt. The Green Belt has played a significant strategic role in limiting the outward expansion of Greater London, preserving the openness of the countryside, as well as minimising the coalescence of neighbouring settlements. It also accommodates key infrastructure, including four major water supply reservoirs and the Ashford Common water treatment works.

12. Spelthorne also contains areas of national and international importance for nature conservation. In addition to the reservoirs, Staines Moor is designated as a Site of Special Scientific Interest, further underscoring the need for a balanced approach to growth that respects the Borough's unique environmental assets.
13. The Spelthorne Local Plan seeks to address 3 primary constraints that shape its future development. The Green Belt, while essential for environmental and strategic reasons, limits the availability of land for growth. The River Thames, which borders the Borough, presents a significant flood risk due to Spelthorne's low-lying topography, requiring careful planning and mitigation. To the north, Heathrow Airport offers Spelthorne substantial economic benefits, including employment and business opportunities, but also imposes technical and environmental limitations that must be managed to ensure safe and sustainable development whilst ensuring its critical contribution to the UK economy.

Public Sector Equality Duty

14. I have had due regard to the aims expressed in S149(1) of the Equality Act 2010. This, amongst other matters, sets out the need to advance equality of opportunity and foster good relations between people who share a protected characteristic and people who do not share it.
15. This has included my consideration of several matters during the examination including meeting the housing needs of different groups, and health and wellbeing (Policies H1 and H2), also ensuring that development is designed to be accessible (Policy PS2) along with ensuring there is adequate provision to meet the accommodation needs of the Gypsy, Traveller and Travelling Showpeople communities (Policies ST2, H1, H2 and H3). In this way the disadvantages that they suffer would be minimised and their needs met in so far as they are different to those without a relevant protected characteristic. There is also no compelling evidence that the SLP as a whole would bear disproportionately or negatively on them or others in this category.

Assessment of Duty to Co-operate

16. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
17. The submitted Plan was accompanied by a number of statements of common ground (SoCGs) with neighbouring authorities and relevant Duty to Cooperate bodies as required by paragraph 27 of the NPPF. Further commentary can be found within the Duty to Co-operate Statement of Compliance, 25 November 2022 (CD014) and the Duty to Cooperate Compliance Statement Addendum Updated 24 January 2025 (CD014b).

18. The evidence demonstrates that the Council has been involved in ongoing and constructive engagement on strategic planning matters during the preparation of the SLP. In particular with, the London Borough of Hillingdon, London Borough of Hounslow, London Borough of Richmond upon Thames, Runnymede Borough Council, Slough Borough Council and Royal Borough of Windsor. Meaningful engagement also took place with the neighbouring borough of Elmbridge and Surrey County Council.
19. The Council has demonstrated meaningful engagement with the following prescribed bodies; the Environment Agency, Historic England, Natural England, the Mayor of London/Greater London Authority, Transport for London as well as other bodies such as the Civil Aviation Authority, Surrey Nature Partnership, and National Highways.
20. I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

Assessment of Other Aspects of Legal Compliance

21. The Plan has been prepared in accordance with the Council's Local Development Scheme November 2022 (CD008) and Local Development Scheme (2024) December 2024 (CD026).
22. Consultation on the Plan and the MMs was carried out in compliance with the Council's Statement of Community Involvement November 2021.
23. The Council carried out a Sustainability Appraisal of the Plan, prepared a report of the findings of the appraisal, and published the report along with the plan and other submission documents under regulation 19. The appraisal was updated to assess the main modifications.
24. The Stage 1 Screening of the Habitats Regulations Assessment (HRA) (ENV002) for the Plan determined that almost all policies could be screened out from further consideration. However, policies ST2 and ID1 were identified as requiring further assessment through an Appropriate Assessment (AA). The subsequent AA, documented in the Habitats Regulations Appropriate Assessment Report, September 2022 (CD007), was undertaken with input from Natural England, whose advice was incorporated into the process. The AA concluded that the development policies set out in the SLP are unlikely to result in significant effects on the qualifying features or conservation objectives of any Habitats sites. I conclude that the HRA process has been undertaken in a robust and methodologically sound manner, and I concur with its findings. The assessment demonstrates that no adverse effects on the integrity of any Habitats sites within the Borough or its immediate environs would arise, either

alone or in combination with other plans or projects. On the basis of the evidence before me, I am content that the HRA of both the Plan and the Main Modifications is robust and proportionate to the requirements of the Regulations. I also note that Natural England has raised no objections to the assessment or its conclusions.

25. The Development Plan, taken as a whole, includes policies to address the strategic priorities for the development and use of land in the local planning authority's area.
26. The Development Plan, taken as a whole, includes policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.
27. The Plan complies with all other relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

Assessment of Soundness

Main Issues

28. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, I have identified three main issues upon which the soundness of this plan depends. This report deals with these main issues. It does not respond to every point or issue raised by representors. Nor does it refer to every policy, policy criterion or allocation in the Plan.

Issue 1 – Are the Plan's Strategy, Place Shaping and Spatial Policies based on robust evidence, justified, consistent with national policy and are they likely to be effective?

29. The introductory chapter of the SLP sets out the administrative processes associated with the preparation of the plan alongside highlighting the priorities and objectives for the borough.
30. The plan as submitted for examination set out a plan period of 15 years, between 2022 and 2037. However, to ensure that the SLP is positively prepared and consistent with national policy **MM01A and MM03** are necessary to amend the plan period throughout the plan to 2024 – 2039/40 (16 years) ensuring that the plan is consistent with the latest housing trajectory and housing supply requirements for the plan period following its anticipated adoption. For effectiveness and to ensure clarity, **MM02** deletes the Sustainability Appraisal Indicators from all policies as these were only included for consultation purposes during the preparation of the plan.

31. As originally submitted, the SLP sought to rely upon the Staines Development Framework (SDF), a draft Supplementary Planning Document (SPD), to provide detailed guidance on the sustainable and coherent growth of Staines-upon-Thames within the plan period. However, the SDF had not been finalised, nor had it undergone robust and independent examination. Therefore, to ensure the SLP is supported by proportionate and justified evidence, modifications **MM04**, **MM05**, **MM06**, **MM07**, **MM08**, and **MM09** are necessary to remove both reliance and all references to the SDF from the plan.

Strategy and Strategic Policies (ST1 and ST2)

32. The Strategy and Strategic Policies chapter of the submitted SLP includes two key policies. Policy ST1 outlines the presumption in favour of sustainable development, while Policy ST2 sets out the broad spatial strategy for the borough, including the housing requirement and the approach to economic growth over the plan period.
33. As submitted for examination, Spelthorne's housing need, was calculated using the Government's standard methodology at 618 dwellings per annum and has been approached through a combination of urban capacity and targeted Green Belt release. The Council's Strategic Land Availability Assessment identifies realistic urban opportunities, while the Green Belt Assessment provides a structured evaluation of performance, enabling only weakly performing parcels to be considered for allocation. Non-strategic urban sites are expected to come forward as windfall development, supported by evidence of past trends. Given Spelthorne's constrained geography, limited urban capacity, and the lack of scope for significant redistribution within the wider housing market area, the use of selected Green Belt sites forms a proportionate and justified component of the strategy for meeting identified development need.
34. To ensure that the housing requirement in Policy ST2 is consistent with national policy and reflects the borough's objectively assessed housing need, it is necessary to amend the annual/plan period housing figures. **MM10** and **MM11A** increase the annual housing requirement from 618 to 631 dwellings per annum with consequential changes to Policy H1. **MM11A** also increases the requirement for the plan period 2024-2039/40 deleting 9,270 and replacing it with 10,726 dwellings which includes a 20% buffer in the first 5 years. The modification also updates the latest housing supply position in the plan deleting 9,270 and replacing it with 9,900 dwellings. This means that there is a shortfall in housing supply across the plan period when measured against the housing requirement. For effectiveness, **MM12** amends footnote 9 of the policy to clarify that the housing requirement was calculated using the standard method, with a base date of 2024. To ensure the policy is justified by available evidence **MM13A** updates the latest housing sources of supply position for the plan period consistent with national policy (9,900 dwellings). For effectiveness **MM16A** is a consequential amendment to the explanatory text in paragraph

3.12 relating to sites under construction deleting March 2022 and replacing it with the latest housing data from April 2024, the modification also amends the plan period in line with MM1A and MM03.

35. For effectiveness, **MM14A** and **MM15A** introduce a housing trajectory chart and table to the SLP, enabling the monitoring of projected housing delivery over the plan period. The trajectory consolidates past completions, existing commitments and anticipated delivery from site allocations to demonstrate expected supply over the 15-year period from adoption. It is assessed against the updated Local Housing Need figure of 631 dwellings per annum, including a 20% buffer in the first five years, and the plan-period requirement of 10,726 dwellings. While a deliverable five-year and ten-year supply can be demonstrated at adoption, the latest identified supply of 9,900 dwellings indicates an overall shortfall against the full plan-period requirement; accordingly, an immediate partial review will be undertaken by the Local Planning Authority to address longer-term delivery and ensure continued alignment with national policy.
36. Due to the identified shortfall in housing delivery within the plan period, a modification is necessary to ensure that the SLP is positively prepared. **MM17** and **MM17A** introduce an additional policy ST3 that requires an immediate partial review of the SLP upon adoption. This will ensure that the Local Planning Authority (LPA) remains responsive to changing circumstances and can address unmet housing need in a timely and effective manner. The review will provide an opportunity to reassess housing requirements, identify additional land allocations if necessary, and maintain alignment with the most up-to-date national planning policy objectives, thereby supporting sustainable development across the borough. The policy also requires the monitoring of housing delivery including the progress and implementation of sites allocated in this plan to inform the local plan review.
37. ST3 also places an obligation on the LPA to review the employment requirement for the whole Borough based on the most up-to-date Housing and Employment Development Needs Assessment and addressing any resultant need to allocate employment floorspace. It also requires reviewing the Gypsy Traveller and Travelling Show People Needs Assessment, in light of the update to Planning Policy for Traveller Sites (2024). In addition, ST3 requires an assessment of each policy and its conformity to the National Planning Policy Framework (NPPF).
38. In reaching this conclusion, I considered alternative approaches, including requiring the Council to identify further site allocations to address the housing shortfall, as well as undertaking additional work in relation to employment land requirements and potential supply options. However, I am mindful that the progression of the Plan has already experienced significant delay arising from matters relating to flooding and flood risk, which I address later in this report. In balancing these considerations, I attach substantial weight to the acute need for

housing delivery and the importance of providing an appropriate level of certainty within Spelthorne's housing market. I also recognise that an additional benefit of progressing the Plan to adoption is the updating of the development management policies, including those relating specifically to flooding and flood risk, which will strengthen the decision-making framework. Moreover, the identification of new sites would, in all likelihood, necessitate further Green Belt release, and in my judgement such sites should properly be assessed through the lens of the most up-to-date version of the NPPF.

Place Shaping (PS1 to PS3)

39. The Place Shaping chapter of the SLP contains 3 overarching policies that seek to ensure that the design of the built environment contributes positively to making better places within Spelthorne. The policies within the chapter provide direction regarding responding to the climate emergency, design guidance and the conservation of the historic environment.
40. A main modification is necessary to paragraph 4.2 of the introductory text. To ensure that the Plan's climate change strategy is justified in relation to reducing carbon emissions **MM18** adds in 'and adaption' correcting a typographical error meaning that the text is consistent with the Council's climate emergency declaration of October 2020.
41. PS1: Responding to the Climate Emergency is a criteria based policy that seeks amongst other things to ensure that development is directed to sustainable locations that minimise travel demand, prioritise sustainable transport, and make efficient use of land, creating walkable, cyclable neighbourhoods. Proposals should demonstrate sustainable design, including energy efficiency, renewable energy integration, passive cooling, and responsible use of materials. Modifications to the policy wording are necessary to ensure consistency with national policy, **MM19** deletes bullet point 3 (b) in relation to requirements for the provision of electric vehicle charging points as this is set out in Building Regulations, Approved Document 5. Likewise, **MM20** deletes bullet point 5 which set requirements relating to Dwelling Emission Rate against the Target Emission Rate, as these requirements are addressed by Part L of the Building Regulations.
42. To ensure that the policy PS1 is justified, modifications correct typographical errors in the explanatory text. **MM21** corrects paragraph 4.10 in relation to the date the Council declared a climate emergency (October 2020) and **MM22** corrects the reference to the paragraph in the NPPF replacing 148 with 152 setting out that the planning system should support the transition to a low carbon future in a changing climate. For effectiveness **MM23** and **MM24** add 2 additional monitoring indicators to the policy, these record the number of commercial properties built to BREEAM very good or better and the amount of installed renewable/low carbon energy capacity (MW/h).

43. PS2: Designing Places and Spaces is policy that seeks to secure a high standard in the design and layout of new development. To ensure that the policy is effective in securing high quality design **MM25** directs the decision maker to the guidance contained in National Model Design Code, along with ensuring that they have regard to any other relevant design policies/codes. To ensure that the policy is justified **MM26** deletes the reference to the SDF as this no longer forms part of the evidence base for the Plan. For effectiveness, it also clarifies that the use of the design review panel process should be proportionate to the scale and significance of the development proposal. Likewise, **MM27** provides further guidance in the form of explanatory text (new para 4.24) in relation to the approach that should be taken in regard to the parameters and thresholds for use of a Design Review Panel to shape development proposals.
44. Policy PS3: Heritage, Conservation and Landscape seeks to preserve, and enhance as appropriate the architectural, historic and landscape character of the Borough. To ensure the policy is consistent with the statutory duties set out in the Planning (Listed Buildings and Conservation Areas) Act 1990 **MM28** deletes the word 'conserve' in the introductory text of the policy meaning that the text will read 'preserve, and enhance'. It is also necessary to add an additional paragraph **MM29** to ensure that the Plan's approach to the protection of locally listed buildings provides clear direction to the decision maker and is consistent with national policy.

Spatial Policies (SP1 to SP7)

45. The Spatial Policies chapter of the plan contains 7 area specific/thematic policies that seek to ensure that the development needs of the borough are directed to the most appropriate locations. The policies within the chapter set out suitable locations for housing, employment and retail/leisure. The policies also provide a hierarchy for development types, which suit the size and character of each identified area. The policies require decision makers to consider the Borough's river network to support biodiversity and environmental quality, for effectiveness **MM30** strengthens this guidance in paragraph 5.2 by directing them to assess how development affects water quality.

Staines-upon-Thames

46. Policy SP1 establishes Staines-upon-Thames as the primary focus for growth and regeneration within the Borough. This approach is appropriate and justified, given that Staines-upon-Thames functions as Spelthorne's main town centre and sits at the top of the Borough's centre hierarchy, making it the most suitable and sustainable location for directing higher levels of development. The policy aims to guide sustainable and coordinated development in housing, employment, and retail. The policy as originally drafted relied on further detailed guidance to be provided through the emerging SDF, a supplementary planning document. However, as the SDF has not been subject to scrutiny at

examination, **MM31** is necessary to amend the policy by removing all references to the SDF and incorporating the area-specific guidance directly within the policy. This ensures the Plan is justified by the available evidence and effective without requiring additional guidance.

Ashford, Shepperton and Sunbury Cross

47. Policy SP2: Ashford, Shepperton and Sunbury Cross aims to support the delivery of identified development needs by promoting regeneration in Ashford, Shepperton, and Sunbury Cross. It encourages the efficient use of land through increased densities, particularly around public transport stations, while maintaining high-quality design and respecting the existing character of these areas. New developments will be expected to contribute to necessary infrastructure improvements to mitigate their impacts and support sustainable growth.

Stanwell and Stanwell Moor

48. SP3: Stanwell and Stanwell Moor are communities within Spelthorne that experience limited connectivity with the wider borough. Stanwell is more developed and links with Ashford, while Stanwell Moor retains a rural character. Both areas are significantly affected by Heathrow Airport, highlighting the need to secure new and improved infrastructure and facilities to support these communities. The policy seeks to secure improved economic, social and environmental benefits for these areas.

Green Belt

49. Policy SP4: Green Belt does not seek to replicate national policy; instead, it provides locally specific guidance. This is important because the Metropolitan Green Belt in Spelthorne plays a key role in preserving local character by preventing London's outward sprawl, avoiding settlement coalescence, promoting the reuse of previously developed land, and safeguarding the countryside from encroachment. To ensure that Policy SP4 is consistent with national policy **MM32** amends it to clarify how decision makers should react to development proposals that are identified as inappropriate development, making clear that they should not be approved except in very special circumstances. To ensure that the policy is effective **MM33** provides greater clarity within the explanatory text at paragraph 5.21 advising the decision maker that proposals within the Green Belt are expected to comply with all other Plan policies 'when taken as a whole'.

Colne Valley Regional Park

50. The Colne Valley Regional Park (CVRP) spans over 10,000 hectares west of London, forming a 14-mile-long countryside corridor within the Green Belt from Rickmansworth to Staines and Wraysbury, where the River Colne meets the Thames. At its widest, it measures 3 miles and crosses several local authority boundaries. Around 1,000 hectares lie within Spelthorne, including three major reservoirs, Staines Moor, Hithermoor, and the settlement of Stanwell Moor.
51. Policy SP5: Colne Valley Regional Park seeks to protect and enhance the CVRP's landscape, historic environment, and waterscape, while conserving biodiversity and resisting inappropriate urbanisation. It promotes countryside recreation, supports a sustainable rural economy, and encourages community involvement through volunteering, education, and access to green spaces that foster health and well-being. For effectiveness in delivering the requirements of the policy **MM34** adds 'enhancement' to benefits to enable development proposals to contribute to the improvement and enrichment of the CVRP. Moreover, it is necessary for effectiveness to identify the River Colne Site of Nature Conservation Importance (SNCI) and King George VI Site of Special Scientific Interest (SSSI) as key features within the CVRP, **MM35** adds this to paragraph 5.22 of the explanatory text. For effectiveness **MM36** provides further clarification in relation to the purpose and objectives of the CVRP as an area for informal recreation.

River Thames and its Tributaries

52. Policy SP6: River Thames and its Tributaries, seeks to protect and, where possible, enhance the setting of the River Thames and its tributaries, recognising the river as one of the Borough's most valuable assets. The Thames is a major tourist attraction and provides significant benefits for tourism, leisure, recreation, and ecology, as well as being an important visual and cultural feature. The purpose of the policy is to safeguard landscape elements that contribute to the river's character and to preserve and improve views of the watercourse. It requires development within the river's setting to be carefully assessed to prevent harm and ensure that proposals make a positive contribution to the riverside environment, maximising the river's potential while maintaining its beauty and ecological integrity.
53. To ensure that Policy SP6 is effective **MM37** provides further detail and clarification at criterion 9 (d) in relation to the provision of undeveloped buffer zones, setting out a requirement of an 8m minimum buffer for main and culverted rivers. **MM38** also amends the explanatory text at paragraph 5.27 to explicitly direct decision makers to the requirement for obtaining a Flood Risk Activity Permit when works are proposed on a main river. This ensures the policy aligns with national policy and regulatory requirements.

54. The River Thames Scheme seeks to reduce flood risk to people living and working near the Thames. It will deliver a new river channel in two sections through Runnymede and Spelthorne, alongside increasing capacity downstream of the Desborough Cut and at key weirs in Sunbury, Molesey, and Teddington. The project also aims to enhance access to green spaces, improve connections with wildlife, and support sustainable travel. Additionally, it will create a network of high-quality habitats to promote biodiversity and environmental resilience. **MM39**, **MM40**, **MM41**, and **MM42** provide additional clarification and detail in relation to the scheme and how it will be implemented within the explanatory text. These modifications are necessary to provide clear direction to the decision maker ensuring that the policy is effective.

Heathrow Airport

55. SP7: Heathrow Airport is a criteria based policy that supports in principle the future expansion of Heathrow airport based on the potential economic benefits for Spelthorne, the Southeast, and the UK. The policy sets out comprehensive measures to mitigate negative impacts on local communities, businesses, services, and the environment. The policy's main goal is to ensure the expansion delivers the best possible outcomes for residents and businesses, particularly those most directly affected by its operation in Stanwell Moor and Stanwell. To ensure that is effective in protecting and/or enhancing designated sites of environmental character and importance **MM43** adds a reference to the CVRP within SP7 (1) (b) first bullet point. For effectiveness **MM44** amends SP7 (1) (b) second bullet point to clearly set out the requirement for qualifying development proposals to provide at least 10% Biodiversity Net Gain (BNG) consistent with national policy. In terms of assessing development proposals close to Heathrow airport or noise from the airport **MM45** clarifies that 'dB LAeq' will be used to assess overall noise exposure for health, and environmental impacts, therefore making the policy effective.

Conclusion

56. Subject to the MMs identified above the Plan's Strategy, Place Shaping and Spatial Policies are based on robust evidence, justified, and consequently they are likely to be effective.

Issue 2 – Whether the Policies of the Spelthorne Local Plan are based on robust evidence, justified, and likely to be effective?

Housing

57. The 3 policies within the Housing chapter of the Plan seek to ensure the delivery of a wide mix of high-quality homes to meet the varied needs of the community. They seek to provide for families through suitable housing sizes, support older people and those with disabilities via accessible and adaptable

homes, and offer affordable options for younger people. The policies also include provision for specialist accommodation and safeguard sites for the Gypsy and Traveller community, promoting inclusive and sustainable living for all residents.

Policy H1: Homes for All

58. Policy H1: Homes for All sets out the Council's approach to meeting the housing needs of the Borough. The policy reiterates the housing requirement for Spelthorne. It further sets out the required housing mix and standards necessary to meet varied needs of the community. The policy also includes direction for the decision maker in relation to the provision of accessible homes, specialist accommodation and self and custom build housing.
59. To ensure that the Policy H1 is consistent with national policy, **MM46** amends footnote 26 in relation to the application of the standard method for assessing housing need deleting '2021' and replacing it with 'at 2019 with a base date of 2024' to fully address historic under supply. **MM47** amends the annual housing requirement replacing 618 homes per annum with 631 homes per annum, consistent with Policy ST2 in bullet point 1. **MM54** is a consequential modification within the policy's explanatory text at paragraph 6.9.
60. Bullet point 7 sets out that the Council are supportive of 'Build to Rent Housing' subject to the provision of affordable housing, **MM48** clarifies that this should be consistent with national policy requirement of 20%, rather than relying on a benchmark figure that is yet to be established. **MM55** provides additional explanatory text in a new paragraph at 6.16 regarding affordable housing on build to rent schemes, setting out that it should be provided by default in the form of affordable private rent, which is the tenure specifically intended for this type of development. These modifications ensure that the policy will be effective and justified by the available evidence.
61. Bullet point 8 of the policy provides direction in relation to accessible housing. For effectiveness **MM49** adds additional text in relation to adaptable homes ensuring that homes can meet the needs of occupiers over their lifetime including responding to any disability. For effectiveness **MM50** and **MM51** provide further guidance in regard to the specific requirements of Part M of the Building Regulations that address accessible and adaptable buildings, and wheelchair user dwellings. To ensure that the policy is effective **MM56** provides further explanatory text relating to wheelchair accessible provision. To ensure that the policy is positively prepared **MM57** adds further guidance in the explanatory text regarding accessibility where site specific circumstances mean that the requirements of the Building Regulations may not be achievable.

62. Bullet point 11 of the policy addresses the requirement for the provision of affordable housing in specialist accommodation development proposals. To ensure that the policy is both effective and positively prepared **MM52** deletes the reference to 'use class C3' and replaces it with 'a relevant use class' further directing the decision maker to Policy H2: Affordable Housing. This modification seeks to ensure that affordable housing can be delivered across a range of specialist accommodation models.
63. Bullet point 14(c) of the policy provides guidance on Self and Custom Build Housing, specifically the approach to unsold plots. To ensure the policy is effective, **MM53** clarifies that any plots remaining unsold after being made available and actively marketed for a minimum of 12 months must be returned to the developer. These plots should then be built out as market housing, rather than remaining on the open market or being offered to the Council or a Housing Association.

Policy H2: Affordable Housing

64. Policy H2: Affordable Housing seeks to provide a deliverable framework for securing affordable housing from new development across the Borough. It aligns with national planning policy and responds to locally identified needs, endeavouring to reduce the gap between the supply of affordable homes and the level of identified housing need. The policy is particularly important given the significant pressures on housing affordability within the Borough, where median house prices substantially exceed median workplace-based annual earnings.
65. The required provision of affordable housing on all schemes of 10 Units (net) or more is set out in H2 (1). To ensure that the policy is positively prepared **MM58** provides additional direction to the decision maker to clarify that the minimum amount of affordable housing to be delivered should be calculated based on the net total amount of provided dwellings. This modification is necessary to ensure amongst other things the viability and delivery of affordable housing on estate regeneration schemes across the Borough.
66. The policy at H2 2) (d) sets out the requirement for development proposals on qualifying sites to detail the type of tenure in the affordable homes provided. This is to ensure that they contribute towards meeting the specific affordable housing needs identified in the Strategic Housing Market Assessment. **MM59** modifies the text to make clear that the tenure split should be informed by the Council's most up to date evidence. **MM60** is a consequential modification to footnote 29 to allow for the use of other sources that demonstrate affordable housing need which may contribute to understanding needs specific to the development area. These modifications are necessary for the policy to be positively prepared.

67. Policy H2 2) (e) sets out that the Council's requirement for the provision of affordable housing within 'Build to Rent Housing. For effectiveness **MM61** clarifies that this should be consistent with national policy requirement of 20%, rather than relying on a benchmark figure that is yet to be established.
68. Policy H2 2) (g) sets out the requirement to provide affordable housing to all residential development within Use Class C3, except for Gypsy and Traveller pitches and Travelling Showpeople plots. For effectiveness **MM62** deletes 'Use Class C3' and replaces it with 'Use Class C2, C3 and C4, or any subsequent amendments to the Use Classes Order' meaning that all types of residential development can contribute affordable housing to meet the objectively assessed needs of the Borough. For effectiveness **MM63** introduces an additional monitoring indicator to assess the performance of the plan in relation to the delivery of affordable housing and its impact on the number of people on the Council's Housing Register.

Meeting the Needs of Gypsy, Traveller and Travelling Showpeople

69. Policy H3: Meeting the Needs of Gypsy, Traveller and Travelling Showpeople seeks to safeguard existing authorised pitches and to provide additional Gypsy and Traveller pitches, as well as plots for Travelling Showpeople, to meet identified accommodation needs within the Borough. To ensure consistency with national planning policy, **MM64** introduces additional criteria clarifying the circumstances in which development may be acceptable within Flood Zones. This reinforces that caravans, mobile homes and park homes intended for permanent residential use are classified as highly vulnerable, and therefore are not permitted in Flood Zone 3, and are only permissible in Flood Zone 2 where the Exception Test is satisfied. This modification will mean that proposals avoid areas at the highest risk of flooding and appropriately reflect national policy on flood risk vulnerability and sequential risk-based decision-making.

Environment

70. Chapter 7 of the SLP focuses on the environment, it explains how the Plan will protect and enhance Spelthorne's natural environment to tackle climate change, address biodiversity loss, and support healthier, more sustainable communities. It outlines the importance of safeguarding existing natural assets and securing high quality development that delivers environmental improvements over the next 15 years. To achieve this, it contains five policies that deal with Green and Blue Infrastructure, Biodiversity, Managing Flood Risk, Environmental Protection and Open Space and Recreation.
71. To ensure consistency with national policy, **MM65** updates the explanatory text at paragraph 7.2 by extending the plan period from 15 to 16 years, aligning it with the modifications made elsewhere in the Plan.

Green and Blue Infrastructure

72. Policy E1: Green and Blue Infrastructure aims to secure a strategically planned green and blue infrastructure network that delivers multiple environmental, health, and climate-resilience benefits. It promotes the protection and enhancement of natural and water-based features, from parks and woodlands to Sustainable Urban Drainage Systems (SuDS) and watercourses, to support sustainable development and improve wellbeing across the Borough.
73. For effectiveness, **MM66** clarifies in bullet point E1(1) that 'all' development must contribute to the provision, protection, and enhancement of the wider green 'and blue infrastructure' network. **MM67** further amends E1(3) to ensure effective decision making by requiring consideration of blue infrastructure that supports flood risk management where proposals are located on, or adjacent to, a watercourse or reservoir. To ensure the explanatory text reflects this updated approach, **MM68** introduces a consequential modification to paragraph 7.7, directly supporting and aligning with the changes made through MM67. These modifications ensure that the policy is effective.
74. As drafted, the reasoned justification for Policy E1 at paragraph 7.9 depends on the future preparation of supplementary guidance to explain how development should contribute to enhancing green infrastructure. **MM69** removes this reference, ensuring that the policy remains effective and justified on the basis of the evidence already available, without relying on additional guidance that has not yet been produced. For effectiveness **MM70** introduces a new paragraph 7.10 within the reasoned justification section of the policy. It sets out how minor and householder developments can incorporate simple features that enhance or contribute to the green infrastructure network. It adds that these minor improvements play an important role in strengthening and connecting green spaces, and applicants are encouraged to enhance existing green infrastructure and avoid or mitigate any loss wherever possible. To ensure the policy is justified by the most recent evidence, **MM71** updates the referenced date of the Biodiversity Opportunity Areas: The Basis for Realising Surrey's Ecological Network (Surrey Nature Partnership) report in the Key Evidence section, replacing 2015 with 2019.

Biodiversity

75. Policy E2: Biodiversity is a criteria based policy that seeks to ensure that development strengthens biodiversity by restoring and enhancing habitat connectivity, prioritising habitat creation in Biodiversity Opportunity Areas (BOA), and requiring proposals to demonstrate measurable BNG as part of the planning process.

76. E2 (3) directs that the Council will protect SNCIs, allowing development only where it is clearly demonstrated, through appropriate assessment, that no direct or indirect harm will occur to their ecological value. To ensure that the policy is effective and positively worded **MM72** provides additional guidance to the decision maker setting out that development proposals will be supported where they clearly demonstrate enhancements to the value of SNCIs and include an agreed long-term management plan setting out how those enhancements will be secured.
77. E2 (5) sets out the Council's approach to securing at least 10% BNG. To ensure that the policy is effective **MM73** provides additional direction setting out that BNG provision should be appropriate to the scale of the development proposed. E2 (6) directs that developers are expected to consider a range of measures to improve biodiversity, including innovative features such as bee bricks, bird boxes, green roofs, and living walls. For effectiveness in securing BNG, **MM74** adds bat roost boxes and gabions, whilst encouraging the minimising of external lighting to the examples of innovative approaches. **MM75** amends E2 (7) to ensure that development proposals demonstrate how BNG is achieved in accordance with national, regional and local biodiversity strategies, meaning that the plan is positively prepared.
78. As drafted E2 (8) establishes a BNG delivery hierarchy for the Borough. To ensure consistency with national policy, **MM76** strengthens the policy by setting out and requiring development to follow the BNG mitigation hierarchy, avoiding losses first, then mitigating impacts, and only compensating as a last resort. It also clarifies that, where off-site compensation is necessary, it should be secured on land within the Borough boundary wherever feasible and practical, providing appropriate flexibility for sites located near administrative boundaries.
79. E2 (10) provides direction to decision-makers regarding development on or adjacent to waterbodies within the Borough. **MM77** removes the final sentence, which had set out guidance for circumstances where significant adverse effects on waterbodies could not be fully addressed. This deletion is necessary because the wording conflicted with national policy and the requirements of the Water Framework Directive.
80. To ensure that the policy is positively prepared **MM78** and **MM79** provide additional guidance in the explanatory text at paragraph 7.24 directing the decision maker to the Local Nature Recovery Strategy and at paragraph 7.25 highlighting that the River Thames (TV06) is a BOA. To ensure the policy is justified by the most recent evidence, **MM80** updates the referenced date of the BOAs: The Basis for Realising Surrey's Ecological Network (Surrey Nature Partnership) report in the Key Evidence section, replacing 2015 with 2019.

Managing Flood Risk

81. Policy E3: Managing Flood Risk is a criteria based policy which seeks to ensure that new development is directed to the areas of lowest flood risk and designed to remain safe from flooding, in line with national guidance and the Council's flood risk evidence. It requires the use of the sequential and, where necessary, exception tests, and expects site layouts to minimise and safely manage flood risk without increasing risk elsewhere.
82. As highlighted elsewhere in this report the River Thames and its tributaries are a significant consideration in planning for the Borough. Flooding and flood risk are a major influence in relation to the site allocation process and subsequent decision making. As such it is critical to ensure that the policies and site allocations within the plan are effective, robust, evidence based and consistent with national policy and guidance. In this respect **MM81** and **MM82** are necessary to modify policy E3 to ensure that it is both effective and consistent with national policy. For clarity and effectiveness, **MM83** and **MM84** amend footnotes 9 and 10 to direct decision-makers to published guidance on flood-risk emergency planning and the latest national policy. Similarly, to support effective monitoring of the plan, **MM85** updates the monitoring indicators to record any decisions that depart from the advice of the Environment Agency and/or Surrey County Council as Lead Local Flood Authority (LLFA).
83. Addressing flooding and flood risk issues in Spelthorne has been a complex and time-consuming exercise. It has required extensive modelling, analysis, and detailed technical discussions between the Council, the Environment Agency, and the Lead Local Flood Authority. Furthermore, it is also important to acknowledge the contributions of residents during the examination, whose local knowledge and input greatly contributed to this process. This positive collaborative approach has ensured that the modified Policy E3, together with the detail assessment of the proposed site allocations discussed later in this report, will provide the necessary level of protection from flooding for both existing and future residents of the Borough.

Groundwater

84. I have carefully considered the issues of groundwater and groundwater-related flood risk, which were highlighted as key local concerns. Representations explained that Staines is underlain by river terrace gravels above impermeable London clay, enabling groundwater flows beneath the town. Interested parties contended that these flows, combined with rainfall-generated surface water, may contribute to flood risk on both sides of the River Thames. It was also confirmed that an independent academic study by Royal Holloway, University of London is underway to examine the scale and effects of groundwater movements in the area.

85. In response to these concerns, I sought the views of the Environment Agency and the Lead Local Flood Authority. While noting the issues raised and the emerging study, neither objected to the Managing Flood Risk policy on the basis of groundwater effects. We also discussed the approach that would be taken to assessing any development proposal should groundwater-related flood risk be demonstrated to be a material issue. Based on the evidence before me, I am satisfied that Policy E3 provides an appropriate framework to secure necessary protection and mitigation should such circumstances arise. Moreover, given the necessity of introducing an additional policy (ST3) that requires an immediate review of the SLP upon adoption, it is appropriate that any further evidence relating to groundwater, should it arise, be considered as part of that review process.

Environmental Protection

86. Policy E4: Environmental Protection this policy aims to ensure development protects and enhances the natural and local environment by preventing unacceptable risks from pollution or land instability. It requires proposals to avoid contributing to harmful soil, air, water or noise pollution, and encourages improvements to local environmental conditions, such as air and water quality, alongside the remediation of degraded or contaminated land where appropriate.
87. Regarding air quality, Policy E4(1) as drafted directs the decision-maker to the World Health Organisation (WHO) Air Quality Guidelines. However, to ensure consistency with national policy, modification **MM86** is necessary. This removes the reference to the World Health Organisation Guidelines and instead requires decision-makers to have regard to the most up-to-date Air Quality Action Plan, consistent with the NPPF. **MM95** is a consequential modification that updates the explanatory text at paragraph 7.42 to clarify the Council's ambition to work towards meeting WHO air quality guidelines.
88. E4(5) seeks to ensure that development does not have adverse impacts on water quality or water features. To strengthen the policy's effectiveness, **MM87** introduces additional guidance relating to groundwater flow, quantity, and quality. To ensure that the policy is comprehensive and therefore effective in securing environmental protection, **MM88** introduces a new section into the policy E4(6) to prevent development from being located in areas where future occupiers may be adversely affected by odour. This modification also requires the consequential renumbering of the remaining sub-sections within the policy.
89. In terms of assessing development proposals in relation to noise impact or generation **MM89** clarifies that 'dB LAeq' will be used to assess overall noise exposure for health, and environmental impacts, therefore making the policy effective, with **MM96** and **MM97** making consequential modifications at paragraph 7.54 and the monitoring indicators. Addressing light pollution, Policy

E4 (7) seeks to limit impact of light pollution from artificial light in the interests of amenity, dark landscapes and conservation. For effectiveness, **MM90** introduces additional guidance to ensure that new development is designed to avoid adverse effects arising from existing sources of light pollution.

90. In relation to assessing development proposals on land affected by contamination, **MM91** adds a requirement to E4 (8) that the preparation of appropriate risk assessments and remediation measures must be undertaken by a competent person consistent with the NPPF. To ensure consistency with national policy, **MM93** also introduces additional explanatory text at paragraph 7.37, directing decision makers to the NPPF definition of a competent person.
91. For effectiveness, **MM92** requires that decision-makers apply conditions to planning permissions to ensure that the remediation of contaminated sites is carried out to the required standard and that this work is properly verified. **MM94** is a consequential modification to footnote 57 in relation to correctly referencing Ministry of Housing, Community and Local Government 'Land affected by contamination guidance'.

Open Space and Recreation

92. Policy E5: Open Space and Recreation seeks to protect the Borough's open spaces as valued strategic assets that support health, wellbeing, character, and the wider green infrastructure network. It prioritises safeguarding all identified urban open spaces, recognising their role in providing relief from the built environment and maintaining the quality and distinctiveness of settlements. To ensure alignment with national policy, **MM98** and **MM99** revise the policy sub-heading to include 'sport and recreation facilities'. Correspondingly, 'sports facilities' is added to criterion E5(1), ensuring that decision makers appropriately assess the impact of development proposals sport and recreation facilities to enable them to protect, maintain and/or enhance their provision. For effectiveness **MM100** refines E5 (2) to ensure that development proposals that would lead to the loss, displacement, or change of use of existing open space, sports, or recreational facilities, including playing fields, must be assessed in line with national policy.

Economy

93. Chapter 8 of the plan sets out the Council's approach to the economy. It focuses on strengthening Spelthorne's economic health by supporting vibrant, attractive centres that meet the shopping, leisure, and service needs of residents and visitors. It aims to enhance the Borough's appeal to businesses and visitors, promote a diverse mix of uses, and create local employment opportunities, helping ensure a resilient and prosperous local economy. To achieve this, it contains four policies that deal with Meeting Employment Needs,

Retail, Local Centres, Shopping Parades and Isolated Retail Units, and Leisure and Culture.

Meeting Employment Needs

94. Policy EC1: Meeting Employment Needs seeks to support economic growth in Spelthorne by protecting and enhancing employment land, providing new sites where needed, and encouraging innovative reuse of existing floorspace so the Borough can meet future job growth and sustain its local economy.
95. The Employment Land Needs Assessment identifies a requirement for 19,109 sqm of additional B-class employment floorspace in Spelthorne over the 2022–2037 period (as submitted), comprising growth in E(g)(i–ii) office and light industrial space (+18,372 sqm) and B8 warehousing (+12,005 sqm), offset by a decline in B2 industrial floorspace (–11,268 sqm). Although the assessment predates the COVID-19 pandemic and the shift towards hybrid working, the longer-term implications for future floorspace demand remain uncertain.
96. The explanatory text at paragraph 8.4 identifies the impacts of BREXIT and COVID-19 on working patterns and employment requirements, noting that at the time of the Plan's preparation it remained uncertain whether these changes would prove permanent. For reasons of effectiveness, **MM101** modifies the paragraph to make clear that the Plan has been informed by the most up-to-date evidence available, namely the 2022 Employment Land Needs Assessment. **MM102** amends EC1 (1) by replacing employment 'land' with employment 'floorspace' and provides further direction regarding the protection and innovative re-use of employment floorspace ensuring that the policy is effective. EC1 (4) identifies five designated employment areas within the Borough; **MM103** provides further guidance for the decision maker in relation to appropriate uses at Shepperton Studios making clear that it is not a preferred location for new office and research and development floorspace. EC1 (9) seeks to protect employment floorspace located outside designated employment areas.
97. For effectiveness, **MM104** amends the policy to clarify that marketing evidence is not required where an employment site is allocated for an alternative use within the Plan. **MM105** updates the monitoring indicators to track the net change in permitted and completed E(g)(i and ii), B2 and B8 floorspace (sqm) across the Borough, aligning the indicators with the findings of the 2022 Employment Land Needs Assessment and ensuring the policy is implemented effectively.
98. In conclusion, recent localised effects of Brexit and COVID-19 may have temporarily suppressed demand for employment floorspace, while the prospect of further Heathrow-related growth could alter longer-term requirements. In

these circumstances, and as set out earlier in this report in relation to new Policy ST3, it is necessary for the LPA to undertake an immediate partial review to robustly reassess employment floorspace needs, ensuring the Plan remains responsive to evolving economic conditions and aligned with up-to-date evidence.

Retail

99. Policy EC2: Retail seeks to ensure that the Borough's identified retail needs are met by directing development to its established hierarchy of centres. It aims to maintain and enhance the vitality and viability of Staines-upon-Thames as the main town centre and primary focus for new town centre uses, while supporting Ashford, Shepperton and Sunbury Cross in their roles as district centres. To ensure consistency with national policy, **MM106** adds the national Planning Practice Guidance to the list of key evidence that underpins the Council's policy approach to retail development proposals.

Local Centres, Shopping Parades and Isolated Retail Units

100. Policy EC3: Local Centres, Shopping Parades and Isolated Retail Units is a policy that identifies and seeks to protect and support Spelthorne's local centres and shopping parades, which provide essential day-to-day services for their surrounding communities. As many of these centres are located in more isolated parts of the Borough, the policy aims to support their continued viability so they can remain accessible, sustainable hubs to meet local needs.

Leisure and Culture

101. Policy EC4: Leisure and Culture is a positively worded policy that seeks to encourage high-quality and varied leisure and visitor facilities that enhance tourism, arts and cultural heritage within the Borough. By supporting such proposals, the policy aims to strengthen quality of life, promote social and cultural well-being, contribute to economic growth, and protect and enhance the natural environment. **MM107** amends EC4 (3) to ensure that any proposals leading to the loss, relocation or change of use of major indoor sports facilities are assessed in line with the most up-to-date national planning policy.

Infrastructure and Delivery

102. Chapter 9 explains how the Borough will ensure that essential infrastructure, such as transport, social and community facilities, and green spaces, is planned, delivered, and aligned with future growth. It outlines how the Infrastructure Delivery Plan (IDP) identifies what new or improved infrastructure is needed to support development over the plan period, based on ongoing engagement with providers and stakeholders. Together with the Plan's policies,

it sets out how infrastructure needs will be met to secure a sustainable future for the Borough. To achieve this, it contains 2 policies that provide the decision maker with clear direction in relation to Infrastructure and Delivery, and Sustainable Transport for New Developments.

Infrastructure and Delivery

103. Policy ID1: Infrastructure and Delivery seeks to ensure that development is supported by timely and adequate infrastructure, requiring early engagement with providers and appropriate mitigation through on-site provision or contributions. It also protects existing social and community facilities, allowing their loss only where need and viable alternatives have been fully addressed.
104. To ensure consistency with national policy, **MM108** updates the explanatory text at paragraph 9.1 by extending the plan period from 15 to 16 years, aligning it with the modifications made elsewhere in the Plan. For effectiveness, **MM109** amends the explanatory text in paragraph 9.9 to provide clearer guidance to decision makers on how to direct developers to demonstrate that sufficient wastewater and water network capacity will be available to support the proposed development and its occupation. **MM110** deletes the reference to Part 2 of the IDP ensuring that the policy is based upon robust and justified evidence.

Sustainable Transport for New Developments

105. Policy ID2: Sustainable Transport for New Developments uses a criteria based approach to direct that new development supports sustainable and active travel by prioritising public transport, cycling, walking, EV infrastructure and appropriate parking standards. It also seeks to secure contributions to transport improvements, strengthens borough-wide sustainable transport networks, and applies tailored parking standards in Staines-upon-Thames.
106. For effectiveness **MM111** amends ID2 (1) (a), (d) and (e) to clarify that the sustainable and active travel measures required by the policy will only be necessary where they are identified as required. This ensures the policy focuses transport infrastructure and initiatives where they are most needed to maximise the use of sustainable and active travel modes. For effectiveness **MM112** amends ID2 (1) (b) setting out in a footnote that parking requirements may be reduced in locations with strong access to public transport and local services, subject to factors such as proximity to transport nodes, the quality and frequency of rail and bus services, the suitability of walking and cycling routes, and consistency with Surrey County Council's Car Club Guidance. For effectiveness **MM113** amends ID2 (1) (d), (f) and 2 (c) replacing Public Transport Interchange with Public Transport Stations improving clarity for the decision maker. Likewise, **MM114** updates ID2 (1) (e) deleting the term

'forthcoming' in relation to the status of the IDP as it has now been prepared.

MM115 updates ID2 (1) (f) increasing the flexibility and therefore the effectiveness of the policy by deleting the word 'major' meaning that any development likely to generate significant transport activity should prepare a Transport Assessment and Travel Plan, **MM117** is a consequential modification to the explanatory text at paragraph 9.17, these ensure that the policy is effective.

107. For effectiveness **MM116** modifies paragraph 9.15 to direct decision makers to Surrey County Council's 2022 Local Transport Plan, which seeks to cut transport-related emissions in support of the county's 2050 net-zero target. A key element is the development of Local Cycling and Walking Infrastructure Plans to create safe, high-quality routes that encourage more walking and cycling. To ensure that the policy is justified, **MM118** updates the key evidence section of the policy to reference Surrey County Council's Vehicle, Cycle and Electric Vehicle Parking Guidance for New Development 2022.

Conclusion

108. Subject to the modifications I have identified the policies of the Spelthorne Local Plan are based on robust evidence, justified, consistent with national policy and consequently they are likely to be effective.

Issue 3 – Whether the Site Allocations of the Spelthorne Local Plan are based on robust evidence, justified, and likely to be effective?

109. As submitted for examination, the SLP contains 55 site allocations, arranged across three tranches covering the full plan period and distributed over Years 1–5, 6–10, and 11–15 to reflect expected delivery timescales. As outlined earlier in this report, addressing flooding and flood-risk issues in Spelthorne has been a complex process, requiring detailed analysis of all 55 allocations. This work resulted in a pause in the examination to allow the Council to collaborate with the Environment Agency. As a consequence, several allocations have had to be deleted due to flood-risk constraints, and the implementation timetable has been adjusted to ensure that mitigation can be secured on others. The pause also enabled the Council to reassess delivery timescales across the remaining sites. The following modifications set out these changes along with other amendments to ensure that the allocations can meaningfully contribute to meeting housing need in Spelthorne.
110. In relation to site selection, the Green Belt Assessments (GRB001–GRB007) provide a comprehensive, staged evidence base to inform decisions on Green Belt boundaries in the Local Plan. Stage 1 established the methodology for assessing Green Belt parcels and evaluated them against national Green Belt purposes. Stage 2 then considered parcels with development potential in more

detail, assessing the level of harm arising from possible release and the robustness of revised boundaries. Stage 3 updated and completed the assessment to align with the emerging Local Plan strategy. Taken together, this tiered approach provides a robust and transparent assessment of Green Belt performance and the implications of potential release, forming a sound basis for the Plan's consideration of Green Belt amendments.

111. For effectiveness, **MM119A** updates the site-specific guidance for allocations AE3/006, AS1/001, AS1/003, AS2/006, AT1/002, AT1/012, AT3/007, AT3/009, AT3/016, HS1/002, HS1/009, HS1/012, HS1/012b, HS2/004, LS1/024, RL1/011, SC1/006, SC1/013, SC1/019, SC1/021, SE1/003, SE1/005, SE1/008, SE1/020, SE1/024, SE1/025, SH1/010, SH2/003, SN1/005, SN1/006, SN1/012, ST1/028, ST1/031, ST1/037, ST1/043, ST2/006, ST3/004, ST3/012, ST3/014, ST4/004, ST4/009, ST4/019, ST4/023, ST4/024, ST4/025, ST4/026, ST4/028 to clarify the approach to securing sustainable transport for new development, directing decision-makers to Policy ID2. It also removes the reference to AS1/011, which has been deleted from the Plan.
112. For effectiveness, **MM120** encourages applicants to work with the LPA during the detailed design stage, and the use of a Design Review Panel is supported where it can positively shape development. This applies to the following site allocations of 75 units or more AT1/002, AT3/016, LS1/024, SE1/024, SN1/006, ST1/037, ST3/004, ST4/019, ST4/026, AE3/006, AS1/001, SC1/006, ST3/014, ST4/004, ST4/023, SC1/021, SE1/003, SN1/005, SN1/012, ST2/006, ST3/012, ST4/009.
113. For effectiveness and to ensure consistency with national policy, **MM121** adds site specific requirements in relation flood risk for site allocations ST4/004, ST4/019, ST4/023, ST4/024, ST4/025, ST4/026, ST4/028, SH1/015, SH1/010, SH2/003, and ST1/028 stating that each site will not be available for development until a safe route for access and egress can be provided and maintained during a flood event, specifically the 1% AEP fluvial and surface water events, including an appropriate climate change allowance. In reaching this conclusion I have given significant weight to the extensive advice provided by the Environment Agency.
114. For effectiveness **MM122A** amends the allocation timeframe for years 1–5, replacing 2023–2027 with 2024–2028 for the following site allocations: AS2/006, AT1/002, AT1/012, AT3/007, HS1/002, HS1/009, HS1/012, HS2/004, LS1/024, SE1/005, SE1/024, SN1/006, ST1/037, ST1/043, and ST3/004.
115. For effectiveness **MM134** amends the allocation timeframe for years 6–10, replacing 2028-2032 with 2029-2033 for the following site allocations: AE3/006, AS1/001, RL1/011, SC1/006, ST3/014, ST4/004, ST4/023, ST4/024.

116. For effectiveness **MM146A** amends the allocation timeframe for years 11–16, replacing 2033–2037 with 2034–2039/40 for the following site allocations: AT3/009, SC1/013, SE1/003, SE1/008, SH1/015, SH2/003, SN1/005, ST1/031, ST2/006, ST3/012, ST4/009. Likewise, **MM145A** updates the title of that specific section of the Plan deleting Years 11-15 (2033-2037) and replacing it with Years 11-16 (2034-2039/40).

Years 1 to 5

117. AS1/011 (Land at Former Bulldog Nurseries, Town Lane) as drafted was a site allocation for residential development (C3): 24 units (approx.) However, during the Main Modification consultation the owners of the site confirmed that it was no longer available for residential development. Therefore, to ensure that the plan is justified **MM152A** deletes the allocation from the plan, retaining the site within the Green Belt as exceptional circumstances have not been demonstrated.
118. AS2/006 (Land East of Desford Way) is a site allocation specifically for 15 serviced Travelling Showpeople plots and provides detailed guidance to support proposals for this use. The allocation is strictly limited to Travelling Showpeople accommodation and must not be used for general residential development (Use Class C3). Having considered the identified accommodation needs of Travelling Showpeople, I conclude that exceptional circumstances exist to justify releasing this site from the Green Belt.
119. AT1/002 (Land East of Ashford Sports Club, Woodthorpe Road) is a site allocation for residential development (C3): 108 units (approx.) in a sustainable location. In light of its location, limited size, and the absence of meaningful physical or visual links to the wider Green Belt, the parcel's release in isolation would not give rise to harm to the overall function or performance of the wider Green Belt. Therefore, taking account of identified housing needs, I conclude that exceptional circumstances are demonstrated to release the site from the Green Belt.
120. AT1/012 (Ashford Community Centre, Woodthorpe Road) is a site allocation for mixed use of local community use F2(b): 300sqm Community Centre (approx.), and residential development (C3): 32 units. For effectiveness, **MM123** provides further site specific direction to avoid increasing flood risk, setting out that new development must not exceed the existing building's footprint and should reduce it where possible. It also requires the site layout to provide an appropriate setback from the River Ash. The site lies within a narrow gap between neighbouring settlements and contributes to preventing further coalescence. Whilst its release would adversely affect the performance of the wider strategic Green Belt. It is, however, acknowledged that the site contains a substantial proportion of previously developed land and offers potential for mitigation through green infrastructure enhancement. Consequently, taking

everything into account including the identified housing needs, I conclude that exceptional circumstances are demonstrated to release the site from the Green Belt.

121. AT3/007 (Ashford Multi-storey Car Park, Church Road) is a site allocation on previously developed land for a residential led mixed use scheme comprising of residential (C3): 55 units (approx.) and retail/community use: 400 sqm (approx.).
122. AT3/016 (23-31 (not 11-19) Woodthorpe Road) is a site allocation for a residential led mixed use scheme that comprises of residential (C3): 120 units (approx.) ground floor office/retail (Class E): 1300 sqm (approx.). For effectiveness, **MM141**, moves the projected delivery timeframe of the site from Years 1-5 to Years 6-10 (2029-2033) of the plan period reflecting the latest likely availability of the site.
123. HS1/002 (Land at Croysdale Avenue/ Hazelwood Drive) is a site allocation for residential development (C3): 67 units (approx.) in a sustainable location. Given its enclosed character, small scale, and semi-urban surroundings, the site makes only a limited contribution to Green Belt purposes, and its release would be unlikely to materially affect the performance of the wider Green Belt. Therefore, taking everything into account including the identified housing needs, I conclude that exceptional circumstances are demonstrated to release the site from the Green Belt.
124. HS1/009 (Bugle Nurseries, Upper Halliford Road) is allocated for residential development of approximately 79 dwellings. The site lies to the west of Upper Halliford Road and comprises open fields, paddocks and commercial nursery buildings within the wider Bugle Nurseries area. Part A of the site (2.28 ha), which contains a substantial proportion of previously developed land, is proposed for housing and release from the Green Belt, while Part B (2.55 ha) will remain in the Green Belt as open space to retain the northern boundary. The parcel as a whole plays an important role in maintaining separation between nearby settlements within a narrow and sensitive gap, and its release would affect the performance of adjoining Green Belt in preventing settlement coalescence. However, Part A offers potential for mitigation through enhanced green infrastructure and the creation of publicly accessible open space. Taking these matters into account, alongside Spelthorne's identified housing needs, I conclude that exceptional circumstances have been demonstrated to justify the release of Part A from the Green Belt.
125. HS1/012 (Land East of Upper Halliford, Nursery Road) is a site allocation for residential development (C3): 60 units (approx.) with open space. To ensure that the policy is positively prepared **MM125**, increases the allocation to approximately 70 units. For effectiveness **MM126** deletes the reference to Surrey County Council supporting additional sixth-form provision and the

requirement for it to be agreed as part of any planning application. The nature of any required provision is to be agreed with the Council at the application stage. While the release of this allocation in isolation would have minimal impact on wider Green Belt performance, its release alongside allocations HS1/012b and HS1/009 would reduce separation between settlements and result in some harm to the wider Green Belt function. However, taking account of identified housing needs and the other constraints that I have identified, I conclude that exceptional circumstances are demonstrated to release the site from the Green Belt.

126. HS2/004 (Land South of Nursery Road) is a site allocation for residential development (C3): 41 units (approx.). The release of the allocation in isolation would have limited impact on the wider Green Belt, as its northern position within the strategic gap and enclosed character mean it plays only a limited role in preventing settlement coalescence. The effect would be similar if released alongside the adjoining allocation HS1/012. Overall, its release would not harm the performance or integrity of the wider Green Belt. Consequently, having regard to Spelthorne's identified housing needs, I conclude that exceptional circumstances have been demonstrated to warrant the release of the site from the Green Belt.
127. LS1/024 (Land at Staines Road West and Cedar Way) is a site allocation for residential development (C3): 77 units (approx.). Given the sites weak performance, enclosed character, and limited relationship with the surrounding Green Belt, the release of the allocation would be unlikely to affect the performance of the wider Green Belt. As such, in light of the evidenced housing need, I consider that exceptional circumstances have been demonstrated to justify the site's release from the Green Belt.
128. SE1/005 (Benwell House, Green Street) is a site allocation on previously developed land for residential development (C3): 39 units (approx.).
129. SE1/024 (Annandale House, Hanworth Road) is a sustainably located site allocation on previously developed land for residential led development (C3): 295 units (approx.) and ground floor retail (Class E): 450 sqm (approx.).
130. SN1/006 (Land to West of Long Lane and South of Blackburn Trading Estate) is a site allocation for residential development (C3): 200 units (approx.) with open space provision. Given its weak boundaries, self-contained character, and physical separation from the wider Green Belt, the site makes only a limited strategic contribution, and its release would be unlikely to affect the performance or integrity of the wider Green Belt. Taking these factors into account, alongside the Borough's identified housing needs, I conclude that exceptional circumstances have been demonstrated to justify the release of the site from the Green Belt..

131. ST1/037 (Thameside House, South Street) is a mixed-use allocation on previously developed land comprising approximately 140 residential units (Use Class C3) and around 3,200 sqm of flexible commercial floorspace (Use Class E). For effectiveness, **MM124** provides detailed flood-risk requirements. It specifies that within the part of the site located in Flood Zone 3a (1% AEP), the built footprint of new development must not exceed, and should where possible reduce, that of the existing building. It also requires the site layout to ensure that all development can access the designated safe route for flood-related access and egress, as identified in the Level 2 SFRA, during the 1% AEP fluvial and surface water flood events, inclusive of the appropriate climate-change allowance.
132. ST1/043 (Land East of 355 London Road) is a site allocation for the provision of three serviced Gypsy and Traveller pitches. The allocation is strictly limited to Gypsy and Traveller pitches and must not be used for general residential development (Use Class C3). Given the site's moderate Green Belt performance, enclosed character, and proximity to major infrastructure and built form, its release would have only limited impact on the functioning of the wider Green Belt. Having considered the identified accommodation needs of Gypsies and Travellers, I conclude that exceptional circumstances exist to justify releasing this site from the Green Belt.
133. ST3/004 (Oast House, Kingston Road) is a mixed use site allocation on previously developed land that combines residential development (C3): 180 units (approx.) and community/healthcare use 4,500 sqm (approx.).
134. ST4/002 (Bridge Street Car Park, Hanover House & Sea Cadet Building, Bridge Street, Staines) as submitted for examination was a mixed use site allocation on previously developed land that combined residential development(C3): 158 units (approx.) and hotel 300 bed (approx.). However, the site has been identified as having a high risk of flooding that cannot be mitigated, therefore it is necessary for both effectiveness and consistency with national policy to delete the allocation from the plan **MM133**.
135. ST4/019 (Former Debenhams Site, High Street) is a mixed use site allocation on previously developed land that combines residential development (C3): 150 units (approx.) and commercial (Class E): 500 sqm (approx.). For reasons of effectiveness and to ensure full consistency with national policy, **MM139** amends the anticipated delivery period of the allocation from years 1–5 to years 6–10 (2029–2033), reflecting the timescales required to secure a safe route for access and egress during a flood event consistent with the advice provided by the Environment Agency.
136. ST4/025 (Coppermill Road) is a site allocation for residential development (C3): 15 units (approx.) in a sustainable location. Given its size, position and enclosed

character, the allocation's release would have only limited impact on the performance of the wider Green Belt. Although it lies at the Borough boundary, any cumulative effect alongside land released in the Royal Borough of Windsor and Maidenhead would remain limited, and overall, the allocation makes a lesser contribution to Green Belt function than the wider Local Area. Taking these matters into account, together with the Borough's identified housing needs, I conclude that exceptional circumstances have been demonstrated to justify releasing the site from the Green Belt.

137. ST4/026 (Communications House, South Street, Staines) is a site allocation on previously developed land for residential development (C3): 120 units (approx.). For reasons of effectiveness and to ensure full consistency with national policy, **MM149** amends the anticipated delivery period of the allocation from years 1–5 to years 11–16 (2034–2039/40), reflecting the timescales required to secure a safe route for access and egress during a flood event consistent with the advice provided by the Environment Agency.
138. ST4/028 (William Hill / Vodafone/ Monsoon, High Street) is a mixed use site allocation on previously developed land within Staines town centre that combines residential development (C3): 14 units (approx.) and commercial (Class E): 400 sqm (approx.). For reasons of effectiveness and to ensure full consistency with national policy, **MM150** amends the anticipated delivery period of the allocation from years 1–5 to years 11–16 (2034–2039/40), reflecting the timescales required to secure a safe route for access and egress during a flood event consistent with the advice provided by the Environment Agency.

Years 6 to 10

139. AE3/006 (158-166 Feltham Road) is a site allocation on previously developed land for residential development (C3): 75 units (approx.).
140. AS1/001 (Tesco Extra, Town Lane) is currently a retail supermarket/superstore, the allocation proposes approximately 350 residential units whilst retaining a store on site.
141. AS1/003 (Former Staines Fire Station, Town Lane) is a site allocation on previously developed land for residential development (C3): 50 units (approx.). For effectiveness, **MM129** brings forward the site's projected delivery timeframe from Years 6–10 to Years 1–5 (2024–2028) to reflect its latest anticipated availability.
142. HS1/012b (Land East of Upper Halliford Road) is a mixed use site allocation that combines residential development (C3): 20 units (approx.) and provision for a sixth form college facilities (Use Class F1). For effectiveness, **MM127** brings forward the site's projected delivery timeframe from Years 11–15 to Years 1–5

(2024–2028) to reflect its latest anticipated availability. Likewise, **MM128** introduces greater flexibility by allowing different approaches and options to meet educational need. Therefore, taking account of identified housing and educational needs, I conclude that exceptional circumstances are demonstrated to release the site from the Green Belt.

143. RL1/011 (Land at Staines and Laleham Sports Club, Worple Road). The allocation site forms part of the 6.03-hectare Staines and Laleham Sports Club, accessed from Worple Road. The allocation is divided into two areas: Part A, a 1.59-hectare section proposed for residential development (C3): 52 units (approx.) and removal from the Green Belt, and Part B, a 4.44-hectare area to be retained in the Green Belt for upgraded sports facilities (Class F2). The specific site in question lies on the southern side of the club and is currently used as a sports pitch. It is bordered by housing to the southwest, a garden centre to the south, and open greenfield land to the southeast. The site performs weakly in Green Belt terms, being small, visually contained, and influenced by surrounding development, with limited connection to the wider Green Belt. Releasing only Part A would retain the remaining Green Belt to the north, and, with appropriate enhancement of planted buffers, the allocation's release in isolation would not harm the overall performance of the wider Green Belt. Therefore, taking account of identified housing needs, I conclude that exceptional circumstances are demonstrated to release Part A of the site from the Green Belt.
144. SC1/006 (Tesco Extra, Escot Road) is currently a retail supermarket, the allocation proposes approximately 225 residential units (C3) whilst retaining a store on site.
145. SE1/020 (Sunbury Adult Education Centre, The Avenue) is a site allocation on previously developed land for residential development (C3): 30 units (approx.). For effectiveness, **MM131** brings forward the site's projected delivery timeframe from Years 6–10 to Years 1–5 (2024–2028) to reflect its latest anticipated availability.
146. SE1/025 (Elmbrook House, Station Road) is a site allocation on previously developed land for residential development (C3): 50 units (approx.). For effectiveness, **MM132** brings forward the site's projected delivery timeframe from Years 6–10 to Years 1–5 (2024–2028) to reflect its latest anticipated availability.
147. SH1/010 (Shepperton Library, High Street) is a site allocation on previously developed land for residential development (C3): 10 units (approx.), and the provision of ground floor community use (Class F): 250sqm (approx.) or re-provision off site. For reasons of effectiveness and to ensure full consistency with national policy, **MM147** amends the anticipated delivery period of the

allocation from years 6–10 to years 11–16 (2034–2039/40), reflecting the timescales required to secure a safe route for access and egress during a flood event consistent with the advice provided by the Environment Agency.

148. ST1/028 (Leacroft Centre, Leacroft, Staines) is a site allocation on previously developed land for residential development (C3): 10 units (approx.), and the provision of ground floor community units or re-provision off site. For reasons of effectiveness and to ensure full consistency with national policy, **MM148** amends the anticipated delivery period of the allocation from years 6–10 to years 11–16 (2034–2039/40), reflecting the timescales required to secure a safe route for access and egress during a flood event consistent with the advice provided by the Environment Agency.
149. ST1/029 (Surrey County Council Buildings, Burges Way, Staines) the site as submitted for examination was a mixed use allocation on previously developed land that combined residential development(C3): 30 units (approx.) and the provision of ground floor community units or re-provision off site. However, the site has been identified as having a high risk of flooding that cannot be mitigated, therefore it is necessary for both effectiveness and consistency with national policy to delete the allocation from the plan **MM135**.
150. ST1/030 (Fairways Day Centre, Knowle Green, Staines) the site as submitted for examination was a mixed use allocation on previously developed land that combined residential development(C3): 30 units (approx.) and the provision of ground floor community units or re-provision off site. However, the site has been identified as having a high risk of flooding that cannot be mitigated, therefore it is necessary for both effectiveness and consistency with national policy to delete the allocation from the plan **MM136**.
151. ST3/014 (Birch House/London Road, Fairfield Avenue, Staines) is a mixed use site allocation on previously developed land that combines residential development (C3): 400 units (approx.) (net) and commercial (Class E): 1200 sqm (approx.).
152. ST4/004 (96-104 Church Street, Staines) is a site allocation on previously developed land for residential development (C3): 100 units (approx.).
153. ST4/010 (Riverside Car Park, Thames Street, Staines) the site as submitted for examination was a mixed use allocation on previously developed land that combined residential development(C3): 35 units (approx.), the provision of a community café/commercial (Class E) 150 sqm (approx.) and open space. However, the site has been identified as having a high risk of flooding that cannot be mitigated, therefore it is necessary for both effectiveness and consistency with national policy to delete the allocation from the plan **MM137**.

154. ST4/011 (Thames Lodge Hotel, Thames Street, Staines) the site as submitted for examination was a mixed use allocation on previously developed land that combined residential development(C3): 40 units (approx.), and the provision of a community café/commercial (Class E) 150 sqm (approx.). However, the site has been identified as having a high risk of flooding that cannot be mitigated, therefore it is necessary for both effectiveness and consistency with national policy to delete the allocation from the plan **MM138**.
155. ST4/023 (Two Rivers Retail Park Terrace, Mustard Mill Road, Staines) is a mixed use site allocation on previously developed land within Staines that combines residential development (C3): 700 units (approx.) and complementary ground floor commercial/community use.
156. ST4/024 (Frankie & Benny's/Travelodge, Two Rivers, Hale Street, Staines) is a site allocation on previously developed land for residential development (C3): 55 units (approx.).

Years 11 to 15

157. AS2/001 (Ashford Youth Club, Kenilworth Road) is a site allocation on previously developed land for local community use F2(b): 500sqm Youth Centre (approx.) and residential (C3): 5 units (approx.) For effectiveness, **MM140** brings forward the site's projected delivery timeframe from Years 11–15 to Years 6–10 (2029–2033) to reflect its latest anticipated availability.
158. AT3/009 (Ashford Telephone Exchange, Church Road) is a site allocation on previously developed land for residential development (C3): 20 units (approx.).
159. SC1/013 (RMG Warehouse & Delivery Office, Staines Road West) is a site allocation on previously developed land for residential (C3): 22 units (approx.), and ground floor office/retail (Class E): 500 sqm (approx.).
160. SC1/019 (Sunbury Social Services Centre, Vicarage Road) is a site allocation on previously developed land for residential development (C3): 11 units (approx.), and the provision of ground floor community units or re-provision off site. For effectiveness, **MM130** brings forward the site's projected delivery timeframe from Years 11–15 to Years 1–5 (2024–2028) to reflect its latest anticipated availability.
161. SC1/021 (Land at Spelthorne Grove) is a previously developed site allocated for estate regeneration to provide approximately 250 net additional homes (within a total of around 458 gross units) and enhanced open space. For effectiveness, **MM142** clarifies the scale of development and provides greater certainty regarding the financial contributions required for open space and play facilities, including expectations on their preferred location. It also sets out the approach

to car parking, confirming that any reduction must have regard to Footnote [1] of Policy ID2, with Spelthorne's parking standards guiding on-site provision and Surrey County Council requirements applied to EV infrastructure. Opportunities for a car club, accessible parking, EV charging points and cycle parking, secured through a site-specific Travel Plan, are supported to mitigate traffic impacts. It further clarifies expectations for infrastructure provision or contributions through the IDP or at application stage. In addition, it brings forward the site's projected timeframe from Years 11–15 to Years 6–10 (2029–2033) to reflect its programmed implementation.

162. SE1/003 (Builder's Yard, Staines Road East) is a site allocation on previously developed land for residential development (C3): 75 units (approx.).
163. SE1/008 (Telephone Exchange, Green Street) is a site allocation on previously developed land for residential development (C3): 14 units (approx.).
164. SH1/015 (Shepperton Youth Centre, Shepperton Court Drive) is a site allocation on previously developed land for local community use F2(b): 700sqm Youth Centre (approx.) with associated outdoor space and residential (C3): 24 units (approx.).
165. SH2/003 (Shepperton Delivery Office, High Street) is a mixed use site allocation on previously developed land that combines residential development (C3): 10 units (approx.) (net) and ground floor retail (Class E): 400 sqm (approx.).
166. SN1/005 (Land at Northumberland Close) is a site allocation for residential development (C3): 80 units (approx.). Given its physical separation, limited strategic role, and self-contained boundaries, the release of the allocation would be unlikely to affect the performance or overall integrity of the wider Green Belt. As such, given Spelthorne's identified housing needs, I conclude that exceptional circumstances are demonstrated to release the site from the Green Belt.
167. SN1/012 (Stanwell Bedsits, De Havilland Way) is a site allocation on previously developed land that supports estate regeneration to deliver residential development (C3): 175 net units (approx.). For effectiveness, **MM143** provides clear direction to the decision maker by confirming that the scheme is expected to deliver approximately 175 net additional homes within a total of around 413 gross units. It also clarifies the approach to assessing any proposed parking reductions, which should have regard to Policy ID2 (including Footnote [1]), and sets out expectations for infrastructure provision or contributions required through the IDP or at application stage to support the additional dwellings. In addition, it brings forward the site's projected delivery timeframe from Years 11–15 to Years 6–10 (2029–2033) to reflect its programmed implementation.

168. ST1/031 (Thameside Arts Centre, Wyatt Road) is a site allocation on previously developed land for residential development (C3): 19 units (approx.), and the provision of ground floor community units or re-provision off site.
169. ST2/006 (Builders Yard, Gresham Road) is a site allocation on previously developed land for residential development (C3): 343 units (approx.).
170. ST3/012 (Staines Telephone Exchange, Fairfield Avenue) is a site allocation on previously developed land for residential development (C3): 180 units (approx.).
171. ST4/009 (Elmsleigh Centre and Adjoining Land, South Street) is an allocation that promotes a mixed use town centre regeneration scheme to deliver retail/commercial town centre uses (Class E) and residential development (C3): 850 units (approx.). For reasons of effectiveness and to ensure full consistency with national policy, **MM144** sets out site specific requirements to ensure that development on the site must not increase flood risk, meaning the built footprint should be no larger than the existing building and ideally reduced. The layout must also ensure that all development can safely use the designated access and egress route during a flood event, as identified in the Level 2 SFRA.

Conclusion

172. Subject to the MMs identified above, the Plan's site allocations, providing for approximately 5,672 dwellings, are underpinned by proportionate and robust evidence. They represent a justified and effective means of contributing to the overall requirement for 10,726 dwellings over the plan period. In addition, the allocations make an appropriate contribution to meeting identified needs for commercial, retail and community infrastructure, thereby supporting the delivery of a balanced and sustainable development strategy.

Other matters

Oakleaf Farm, Horton Lane, Stanwell Moor

173. The Surrey Waste Local Plan (SWLP) seeks to ensure that sufficient land is available for new waste-management facilities to handle the equivalent amount of waste produced in Surrey. It also includes policies to ensure these facilities are appropriately located and do not cause significant adverse impacts on local amenity or the environment. In doing so Policy 11a – Strategic Waste Site Allocations identifies strategic waste sites across Surrey. One of the sites identified is Oakleaf Farm, Horton Lane, Stanwell Moor, which at the point of submission for Examination was located within the Green Belt.
174. The SWLP is clear in stating "Sites allocated for waste management use in the Green Belt have been through a process of alternative site assessment at the

plan making stage. Having demonstrated exceptional circumstances to justify the allocation of strategic sites in the Green Belt, the County Council will encourage the LPAs to consider making appropriate alterations to the Green Belt's boundaries as their local plans are reviewed." It was clearly demonstrated during the examination that removing the Oakleaf Farm site from the Green Belt is necessary to ensure consistency with the development plan's strategy for meeting identified sustainable development needs. Taking account of the identified strategic waste requirements, I therefore conclude that exceptional circumstances have been demonstrated to justify removing the site from the Green Belt.

Monitoring

175. Each policy in the SLP includes monitoring indicators that set out how the Council will assess the Plan's performance. These indicators provide the evidence needed to evaluate whether the Plan is delivering successfully and to identify reasonable alternatives if required. They will inform the Authority Monitoring Report (AMR), which will act as the primary mechanism for assessing the Plan's effectiveness. **MM151** consolidates all policy monitoring indicators into a single table, providing clear measures for delivery. This unified approach to monitoring will help ensure that any risks to non-delivery are identified early and that appropriate interventions can be made where necessary, thereby ensuring that the Council's approach to monitoring is effective.

Overall Conclusion and Recommendation

176. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.

177. The Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that the duty to cooperate has been met and that with the recommended main modifications set out in the Appendix the Spelthorne Local Plan satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.

Jameson Bridgwater

Inspector

This report is accompanied by an Appendix containing the Main Modifications.