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Strategic Land Availability Assessment Methodology 2026 – Consultation Draft

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Runnymede and Spelthorne SLAA Methodology

Background

National planning policy and guidance

1. The Government aims to ensure sufficient land is available for new homes. Section 2 of the National Planning Policy Framework (NPPF, 2026), *Plan-making policies*, states at Policy PM9 that 'Development plans should be informed by an assessment of the land available in their area to meet development needs. Further, Policy HO1(1)(a) states that local plan should be based upon 'A housing need assessment that establishes the overall number of homes needed in the area as a minimum over the plan period, using the standard method in Annex D'.

2. It is incumbent upon Local Planning Authorities (LPAs) to demonstrate, in accordance with policy PM9(2) of the NPPF, that 'For plans that allocate specific sites for development, the assessment should be undertaken with reference to national guidance where applicable and be proportionate to the type of plan being prepared. The assessment should include:

   a. A thorough site identification process to identify a sufficient range and quantity of potential sites;

   b. An assessment of the availability, suitability and achievability (including likely viability) of those sites;

   c. An assessment of the amount of development those sites have the potential to accommodate and the potential timescales over which development could be delivered; and

   d. The identification of appropriate sites for development, taking into account the emerging vision and spatial strategy of the plan and the information requirements set out in this policy.

3. The NPPF and the accompanying Planning Practice Guidance (PPG) set out the purpose of a land availability assessment and the main steps that need to be followed to undertake these assessments. Policy HO3(1) of the NPPF states that 'Local plans should identify a sufficient supply and mix of sites to meet or exceed the housing requirement figure and pitch and plot requirements for their areas over the plan period, drawing on the land availability assessment in accordance with policy PM9.' This supports the Government's objective of significantly boosting the supply of homes.

4. Paragraph 8 of Annex D of the NPPF (2026) now states:

   'Local planning authorities should identify and update annually a supply of specific deliverable sites. This should be sufficient to provide a minimum of five years' worth of housing, assessed against their housing requirement in the development plan, or against their local housing need (calculated using the standard method) where the development plan housing requirement is more than five years old.'

5. Section 7 of the NPPF 2026 'Building a strong, effective economy' Policy E1(1)(c) requires development plans to allocate sites to… meet identified needs over the plan period, paying particular regard to facilitating development to meet the needs of a modern economy (including sites and premises which are flexible and adaptable) and the specific locational requirements of different sectors.

6. Paragraph 10 of Annex D of the NPPF also requires 'Local planning authorities should identify and update annually a supply of specific deliverable traveller sites. This should be sufficient to provide a minimum of five years' worth of pitches and plots, assessed against their pitch and plot requirement in the development plan'.

7. The PPG (Housing and Economic Land Availability Assessment[1]) provides detailed guidance on preparing land availability assessments. The purpose is to identify a future supply of land which is suitable, available, and achievable for housing and economic development uses over the plan period.' Sites included in the Strategic Land Availability Assessment (SLAA) therefore need to be considered in terms of their suitability for development of several different uses.

8. Both Runnymede and Spelthorne Councils recognise the benefits of a comprehensive land assessment and are committed to undertaking SLAAs in accordance with the PPG. The guidance allows 'Plan-making authorities to assess land for housing and economic development as part of the same exercise, enabling identification of most appropriate use for each site (PPG paragraph 001). Whilst there is no requirement set out in the PPG for LPAs to identify a five-year supply of land for economic uses, this SLAA will assess sites for a range of development types, including:

    - Residential – Use Classes C2 (residential Institutions) & C3 (dwelling houses, including sites for Gypsies, Travellers, and Travelling Showmen)
    - Economic – All E use classes (business, shop, financial and professional services, café / restaurant, clinic health centres, gyms etc); B use classes (Industrial / Storage and distribution); C1 Hotels.
    - Mixed use developments comprising some of the above use classes.
    - Biodiversity Net Gain (BNG) (including land with potential for BNG, habitat creation or nature recovery)– securing net gains in biodiversity through new development was introduced through the Environment Act 2021. It makes sure that habitats for wildlife are left in a measurably better state than they were before the development[2].There are three ways a developer can achieve BNG:
        - They can create biodiversity on-site (within the red line boundary of a development site).
        - If developers cannot achieve all of their BNG on-site, they can deliver through a mixture of on-site and off-site. Developers can either make off-site biodiversity gains on their own land outside the development site or buy off-site biodiversity units on the market.
        - If developers cannot achieve on-site or off-site BNG, they must buy statutory biodiversity credits from the government. This should be a last resort. The government will use the revenue to invest in habitat creation in England.
    - Suitable Alternative Natural Greenspace (SANG) – these are open spaces that are undergoing enhancements designed to attract more visitors by providing an

[1] http://planningguidance.communities.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/
[2] https://www.gov.uk/guidance/understanding-biodiversity-net-gain#what-bng-is

enjoyable natural environment for recreation as an alternative to the Thames Basin Heaths Special Protection Area (SPA)[3].

9. This joint SLAA methodology has been prepared to ensure compliance with current national policy and guidance. Where local variations in approach are applied, these are explained in chapter 2.

Housing Market Area and Functional Economic Market Area context

10. Runnymede Borough Council (RBC) and Spelthorne Borough Council (SBC) have previously been identified as part of the 'Northwest Surrey Housing Market Area.' In 2015 the two authorities jointly commissioned a Strategic Housing Market Assessment (SHMA) for this area. However, due to differing Local Plan timetables, each authority subsequently updated its SHMA independently (in 2019 for SBC, and 2018 for RBC). Both authorities are now preparing their own Housing and Economic Development Needs Assessment (HEDNA) with Runnymede publishing their version in February and March 2026.

11. Both authorities' SLAA reports are based on a jointly agreed methodology, originally published in December 2015 for SBC, and updated in 2021 and 2025, and again in this report.

12. Previous analysis showed a significant overlap in the Housing Market Area and Functional Economic Market Area boundaries of both boroughs. Accordingly, the Councils will share the findings of the newly commissioned / completed HEDNAs and will continue to work with neighbouring authorities on housing, employment, and other Duty to Co-operate (or future cross-boundary strategic planning equivalent) matters. The following sections provide a brief spatial portrait and Local Plan context for each borough.

Runnymede Borough Council: Spatial portrait

13. Runnymede lies in Northwest Surrey, approximately 20 miles from Central London and benefits from a strategic location around the junction of the M25 and M3 motorways. Runnymede is a geographically small borough, particularly when compared with most of the other Surrey Authorities, measuring just eight miles from north to south. The population of the borough is an estimated 92,118 (ONS mid-2024 estimates). There are three main towns in Runnymede: Addlestone; Chertsey and Egham. There are also a few smaller local centres and villages in Runnymede. The Borough's strategic location combined with the quality of its natural environment make Runnymede an attractive place to live work and visit.

14. Approximately 74% (5,801 hectares) of Runnymede's total land area is designated as Green Belt and land designated as Green Belt is subject to strict policies preventing inappropriate development.

15. Furthermore, primarily due to Runnymede's proximity to the River Thames, flooding is recognised as a particularly important issue in the borough, particularly in the east.

[3] https://www.runnymede.gov.uk/explore-borough/suitable-alternative-natural-greenspaces-sangs

Spelthorne Borough Council: Spatial portrait

16. The Borough of Spelthorne lies in north-west Surrey and borders the London boroughs of Hillingdon, Hounslow and Richmond to the north, the Berkshire authorities of Windsor & Maidenhead and Slough to the west and the Surrey authorities of Runnymede and Elmbridge to the south and east.

17. Spelthorne covers 5,118 ha, with 64% designated as Green Belt. 0.7 hectares was recently released to help meet development needs as part of the Local Plan 2024-3039/40. The population of the borough is 107,188 (ONS mid-2025 estimates). Most of the population are distributed to the larger centres of Ashford, Shepperton, Staines-upon-Thames and Sunbury-on-Thames, which are also the locations of the largest retail centres in the Borough.

18. Due to its proximity to the River Thames and its tributaries, a significant proportion of the borough is at risk from a 1 in 100-year flood event. The River Thames forms the entire southern and eastern boundary of the Borough with Runnymede and Elmbridge.

19. Spelthorne is accessible to both the M3 and M25 motorways with junctions at Staines-upon-Thames and Sunbury-on-Thames. The borough also benefits from six rail stations with direct links to London Waterloo, Reading, Weybridge, and Windsor.

20. Heathrow airport lies just north of the borough in the London Borough of Hillingdon and employs over 8% of Spelthorne residents. Following a period of uncertainty around the expansion of Heathrow Airport, the new Labour Government announced its support for the expansion in January 2025. Both local authorities are part of the Heathrow Strategic Planning Group and will engage in discussions on any future expansion plans moving forward.

Local plan position / evidence documents

21. Runnymede Borough Council (RBC) adopted the Runnymede 2030 Local Plan on 16th July 2020. The Runnymede 2030 Local Plan sets out the key planning policies which determine the location, scale, and timing of new development in the borough in the period up to 2030, including the spatial development strategy, allocations for housing, employment and retail development and protection of the environment. The Local Plan also contains a suite of planning policies against which planning applications in the Borough will be determined.

22. A review of the Runnymede 2030 Local Plan was conducted in accordance with planning regulations, and the Council concluded that the Plan requires updating. The Planning Committee approved the new Local Plan timetable on Wednesday 25th February 2026[4].

23. Background evidence is now being prepared to underpin the new Local Plan. The evidence produced to date is available to view on Runnymede Borough Council's website[5].

[4] https://www.runnymede.gov.uk/local-plan/localplantimetable
[5] https://www.runnymede.gov.uk/local-plan/evidence-base

24. The Spelthorne Local Plan 2024- 2039/40 was adopted by a unanimous vote at an Extraordinary Meeting of the Council on Tuesday 17 March 2026[6]. The Local Plan sets out the policies and allocations that will guide how new development and infrastructure comes forward in the Borough for the next 16 years.

25. Following the adoption of the Spelthorne Local Plan, Spelthorne is undertaking an immediate review of its Local Plan, as required by the Planning Inspector's report and government guidelines. The review is being conducted under the new plan-making framework[7], with the Gateway 1 self-assessment published on 19 October 2026[8].

26. As part of the New Local Plan evidence base, Spelthorne's SLAA will now be retitled the HELAA (Housing and Economic Land Availability Assessment), however it will remain consistent with the SLAA methodology[9].

SLAA Methodology

27. This chapter outlines a nationally compliant methodology for preparing the SLAA. The PPG on Housing and Economic Land Availability Assessment sets out the Government's recommended approach. A robust SLAA should contain the following:

    - Identification of sites and broad locations with potential for development.
    - Assessment of the development potential and suitability of identified sites; and,
    - Assessment of the likelihood of development coming forward (availability and achievability).

28. This methodology is based on the Government's recommended approach, with local interpretation to reflect specific circumstances in Runnymede and Spelthorne. The PPG advises that all sites should be identified regardless of the amount of development needed and that sites with particular policy constraints should be included in the assessment for comprehensiveness. However, constraints must be clearly set out, including where they restrict development, and the assessment should consider what action would be required to overcome them.

29. Accordingly, this methodology distinguishes between absolute constraints which cannot be overcome and result in automatic exclusion and other constraints that may affect a site's suitability. The latter are not exhaustive and typically relate to matters such as heritage assets, open space, and ecological designations. These constraints will be assessed on a site-by-site basis to determine whether mitigation measures could enable development or affect site capacity.

30. The SLAA methodology also addresses specific development types and planning considerations, including student accommodation, housing for older people, permitted

[6] https://www.spelthorne.gov.uk/sites/default/files/2026-03/Spelthorne%20Local%20Plan%202024-2039-40%20%28March%202026%29_0.pdf
[7] Levelling-Up and Regeneration Act 2023 and the Town and Country Planning (Local Planning) (England) Regulations 2026.
[8] https://www.spelthorne.gov.uk/page/1980/gateway-1-self-assessment-summary
[9] For consistency, the term 'SLAA' is used throughout this document. In relation to Spelthorne, all such references should be read as 'Housing and Economic Land Availability Assessment (HELAA)', without repeating this distinction.

development and housing densities. The proposed approaches to these issues are set out in later sections.

Producing the SLAA

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

32. Spelthorne will be using a specialist GIS software - LandCLAN (Land Capacity Land Availability Network) – as a site assessment tool to provide a consistent and evidence-based review of potential SLAA sites. The system brings together a wide range of spatial, environmental and planning constraints data, enabling sites to be screened against factors such as flood risk, heritage assets, ecological designations, accessibility, infrastructure capacity and planning policy considerations. This will provide a mapped overview of site assessments, showing how sites relate to surrounding land uses, infrastructure and constraints. It will help officers identify opportunities and constraints early, compare sites consistently and inform professional judgements on their suitability, availability and achievability as part of the SLAA assessment process.

33. The information analysed through LandCLAN and the SLAA process will later feed into the site selection process to determine which sites will be allocated for the new Local Plan, with additional assessment factors relating to the spatial strategy forming part of this. Inclusion within the SLAA does not indicate support for allocation or development and sites will be subject to further assessment through the plan-making process.

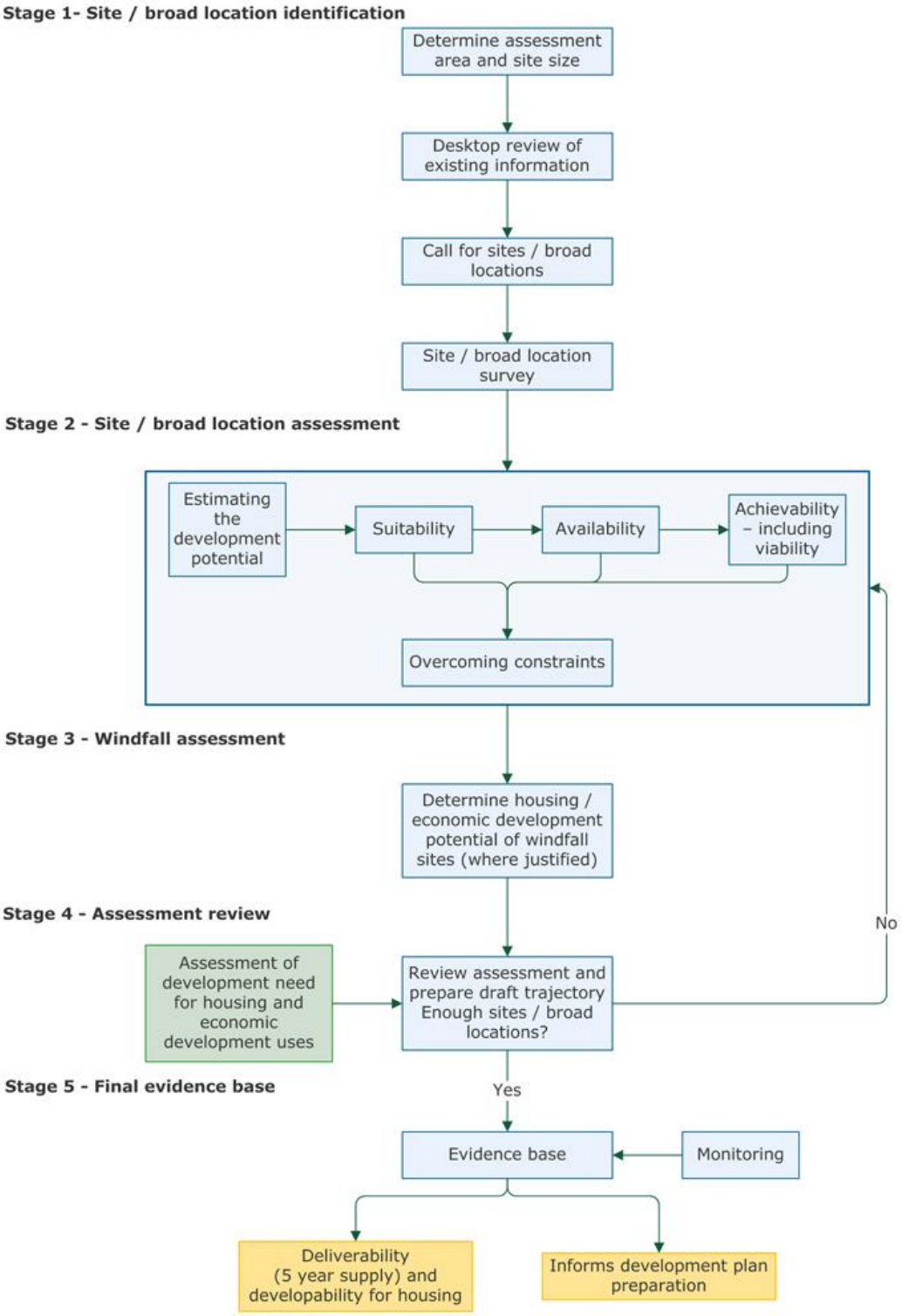

Figure 1: methodology flow chart taken from Planning Practice Guidance- Housing and economic land availability assessment.

Stage 1: Identification of sites and broad locations

34. The SLAA will assess the potential for both housing (including the categories listed under NPPF Policy HO1(2), although it should be noted that parts d, e and i are covered by the general housing category and are not individually listed) and economic sites. For housing, only sites with a potential development capacity of five or more net housing units will be included, though this will still include a variety of sites to meet the requirements of NPPF Policy HO6(1)(a) which states that '10% of the housing requirement on sites no larger than one hectare, and a further 10% on sites of between one and two and a half hectares, unless there are strong reasons why these targets cannot be achieved'. For economic sites (such as those that could provide offices, industrial, research, development, knowledge, logistics, data centres, retail, leisure, renewable/low carbon energy etc.), only those of 500m² floorspace or more or site size of 0.25 hectares or more will be included in the assessment. This approach is considered consistent with the PPG and NPPF.

35. In addition to residential and employment land, sites will also need to be identified to support Biodiversity Net Gain (BNG) and Suitable Alternative Natural Greenspace (SANG). This ensures that off-site provision and biodiversity enhancements can be delivered where required, and that SANG is available divert recreational pressure from the Thames Basin Heaths Special Protection Area (TBH SPA).

36. The SLAA is not an exhaustive list of sites that may come forward for development. Whilst most sites are expected to be submitted through a Call for Sites exercise, other sites identified by the Councils or brought to their attention through other means may also be assessed. Sites submitted after the close of a 'Call for Sites' exercise, may not be included in the next iteration of the SLAA (which is likely to be published several months after the Call for Sites) but will be considered in future updates.

37. The following sets out possible sources that could help identify potentially available sites in the boroughs, the majority of which are suggested by the PPG and the Government's 'Create or update a local plan using the new system' guidance:

- Sites submitted as part of previous consultation processes (such as Local Plan Consultations)
- Previous 5-year housing land supply assessments
- Valuers' department and / or other Council departments for Council-owned land
- Existing housing / economic development allocations
- Redevelopment / redesign of existing residential / economic areas
- Sites subject to Section 106 Agreements
- Planning applications refused, withdrawn or lapsed
- Unimplemented / outstanding planning permissions for housing
- Sites with planning permission for housing that are under construction
- Pre-application discussion sites that are not considered confidential (and agreed by applicant)
- Survey of local land agents' listings to consider the suitability of any plots of land for sale, review of redundant offices / commercial land.
- Ordnance Survey maps and aerial photography
- Register(s) of public sector land

- Neighbourhood Plan Forums (Runnymede currently has four Neighbourhood Forums but there are not currently any in Spelthorne)
- Data from key statutory bodies (such as Surrey County Council, water companies, Network Rail etc)
- Vacant and derelict land and buildings and business requirements
- Development Management officer knowledge
- Engagement with the development industry (for example via a Call for Sites exercise) and Community Planning Panel (Runnymede) and targeted engagement with the community (Spelthorne).
- Sites within 'reasonable walking distance' (defined as circa 800m or 10 minutes' walk in the NPPF Glossary) of a 'well connected station' defined in the NPPF as being served throughout the daytime by at least four trains per hour overall, or at least two trains per hour in any one direction.
- The brownfield land register
- New or previous capacity or intensification assessments
- Opportunities to extend existing settlements

38. Once sites have been identified, the Government's 'Create or update a local plan using the new system' guidance 'Stage 2: Assessing sites' section sets out how the Council should separate sites into different categories. For housing sites, it suggests the categories might include:

    - new settlements
    - large scale urban extensions
    - larger town centre redevelopment or new urban quarters
    - estate regeneration
    - smaller or medium scale previously developed land
    - smaller or medium scale urban extensions to towns or villages
    - town or village infill

39. For employment-led development, sites could be categorised based on their likely future use, for example:

    - offices, leisure and retail
    - research, development, and knowledge (including studios and university development)
    - industrial
    - logistics
    - data centres
    - employment-led mixed use

40. This methodology does not set final categories that both Councils will use, but for example some of those that might be used include:

    - Urban sites.
    - Sites within 800m of the railway station (as all the railway stations in Runnymede and Spelthorne fit within the Government's definition of a 'well connected station' as set out in Appendix B of the NPPF).
    - Previously Developed Land (PDL) in the Green Belt.
    - Grey belt sites.
    - Greenfield sites in the Green Belt.

41. The PPG (Housing and Economic Land Availability Assessment) advises that effective land availability assessments should involve co-operation with relevant stakeholders as part of cooperation on strategic matters. Runnymede and Spelthorne have previously consulted these bodies, the development industry, and other stakeholders on draft SLAA methodologies in 2015, 2021, 2025 and a further consultation was undertaken in 2026 as part of this methodology update. The views expressed during those consultations were considered in updating the methodology.

42. Strategic Planning partners and targeted stakeholders from the local community and the development industry will be invited to review the proposed changes to this updated SLAA methodology.

43. Both Councils will notify agents and landowners on their land availability assessment databases, as well as all contacts on their policy and strategy consultation databases, alerting them about the 'Call for Sites' exercise. Information will also be published on each Council's website. When preparing an updated SLAA, officers will attempt to contact landowners or their agents of sites in the previous iteration of the SLAA to determine site availability. If no response is received about a site within one to two years, depending on how critical it is to understand the availability of sites as part of the Local Plan preparation process, it will be removed from the SLAA. This is to ensure that sites that are in the SLAA (whether they are found to be suitable and achievable) are at the very least, able to be considered available for development as the Council will have had a recent confirmation of its availability. Sites that have an extant or implemented planning permission or Local Plan allocation will also be considered available.

44. These exercises will help both Councils determine which sites are available and deliverable including those that may contribute to the five-year housing land supply and the supply of traveller sites.

45. In addition to the Call for Sites exercise, Runnymede Borough Council also intends to review and potentially update its published Urban Area Capacity Study[10] to feed into the SLAA process which aligns with NPPF Policy L1 which states that Local Plans should accommodate 'as much as possible of the identified need for development in the area on previously developed land' (taking account of the updated definition of PDL set out in the Glossary). This study involved a forensic desktop analysis of the borough's existing Urban Area using Ordnance Survey maps and aerial photography to identify additional potential sites, using density multipliers to understand how the efficient use of land could allow smaller sites to be considered, and then identifying and contacting landowners to proactively enquire about the availability of these sites for development. Green Belt sites will be assessed in conjunction with the updated Green Belt Assessment.

46. Spelthorne Borough Council will also continue its proactive approach in identifying urban sites, an approach which it has adopted since the inception of the SLAA and consistent with the PPG guidance.[11] This includes regular reviews of the urban area and exploration of a wide range of land supply sources. Site databases will be reviewed alongside consultation with Development Management to determine the developability of sites, with officers also seeking to identify any new sources of supply. The LandCLAN tool will help to refine this process and identify any potentially suitable development sites. Green Belt sites will be assessed in conjunction with the updated Green Belt Assessment.

[10] https://www.runnymede.gov.uk/downloads/file/3066/urban-area-capacity-study
[11] Paragraph: 010 Reference ID: 3-010-20190722

47. Each time the SLAA is updated, it will be necessary to check whether sites identified in the previous iterations have been completed and should therefore be removed. If a site has been developed to completion the promoters contact details will be removed from the SLAA consultation database unless they are known to have other land interests in that respective borough.

48. For remaining sites, it will need to be necessary to assess whether they meet the definitions of 'deliverable' or 'developable' as set out in the 2026 NPPF Glossary[12]:

    Deliverable:

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

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

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

    Developable:

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

49. It should be noted that 'major development' is defined in the Glossary of the NPPF as: 'For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m^2 or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.'

50. The 2026 NPPF has also introduced the idea of Medium Development, defined as: 'A sub-set of major development, comprising housing development where 10-49 homes (inclusive) will be provided, and the site has an area of up to 2.5 hectares'. The difference between the two are that Policies in this Framework which relate to major development involving the provision of housing also apply to medium development, whereas policies which apply exclusively to medium development do not apply to larger scales of development.

51. Additionally, the NPPF has also introduced 'Strategic sites', defined as: A site for residential, commercial or mixed-use development which would be implemented in multiple phases, have significant infrastructure requirements and require a masterplan.

[12] https://www.gov.uk/guidance/national-planning-policy-framework-annex-b-glossary

Typically, for a residential-led development, strategic sites would have capacity for at least 1,500 dwellings (although the scale of residential development can vary depending on the mix of uses on the site).

52. If a site previously considered 'developable' (i.e. coming forward in years 6-15) has since gained detailed planning permission, it should generally be reclassified as 'deliverable' (coming forwards in years 1-5).

53. During a Call for Sites exercise, site promoters will be required to submit a completed site proforma containing key information to assist in assessing the site. Appendix 1 outlines the expected information to be provided.

54. The information provided will support a desk-based review of each submitted site including:

    - Size of site (in hectares)
    - Its boundaries as shown on a submitted map / plan.
    - Current use(s)
    - Surrounding land use(s)
    - Character of the area
    - Development progress (if relevant) or an indication of when the site will become available
    - Any physical constraints (such as access)
    - Legal constraints (including ownership issues)
    - International, national, and local policy constraints / designations (which will need testing for appropriateness of suggested land use)
    - Initial assessment as to what type and scale of development the site could accommodate

55. Further site assessment will be undertaken for sites with a reasonable prospect of being considered deliverable. This approach is consistent with the PPG (Housing and Economic Land Availability Assessment), which advises that initial site surveys should be proportionate to the detail needed for a robust appraisal.

56. In some cases, a site visit may be necessary to verify information submitted through the Call for Sites and desk assessment. Site visits can also help assess deliverability by identifying on-site physical constraints and provide an opportunity to give thought to how potential barriers could be overcome.

Stage 2: Site / broad location assessment

57. Once potential sites have been identified, the next stage involves a detailed assessment of their development potential. This includes four main steps. At each stage, Runnymede and Spelthorne will seek to identify solutions to overcome constraints in line with Government guidance.

58. Site assessments will be proportionate, based on available evidence, a site's history, and current planning status i.e. any planning applications or allocation status. Available information will be reviewed to ensure that it remains up to date and whether any changes in delivery may anticipated. Existing housing and economic allocations will be considered as part of the assessment and may progress to Stage 4 where evidence confirms they remain suitable, available, and achievable.

Step 1: Estimate the development potential of a site

59. This step involves estimating the development potential of each site by reviewing physical, policy and legal constraints. Constraints will be categorised as: absolute (not capable of being overcome / mitigated) and non-absolute constraints which may affect suitability but could be mitigated. The approach to absolute constraints and those which may affect suitability are set out in step 2 below.

60. For larger SLAA sites, assumptions may be required to estimate capacity. This may result in a range of potential housing figures for a site. In such cases, a mid-point estimate will be used until more detailed master planning work is undertaken for that site. Further information in relation to densities is set out in the Housing Densities & Accessibility section below.

Step 2: Assess the suitability of the site

61. Sites may be considered unsuitable for housing or other forms of development for a variety of reasons. Constraints whether physical, legal, or policy-based—may affect all or part of a site. Where a site is subject to an absolute constraint or one which affects suitability, that cannot be overcome, it will not be identified as deliverable. However, if a non-absolute constraint can be mitigated, the site may still be considered suitable development.

62. If a site is entirely covered by an 'absolute' constraint, it will be excluded from the SLAA and not assessed further. Where a site is wholly affected by a 'constraint affecting suitability,' the level of assessment will depend on the nature of that constraint. If the constraint cannot currently be overcome, the site remains in the SLAA for monitoring purposes but may not be included in the calculation of land supply depending on the constraint and / or when it could be overcome.

63. When only part of a site is affected by an absolute constraint or partly covered by one which may affect the suitability of the site, the site assessment will reflect this by adjusting the site's capacity accordingly. The SLAA will include an explanation of how the constraint affects capacity and where applicable how it could be overcome.

64. The approach to how constraints will be considered when assessing the suitability of sites is set out below.

Runnymede & Spelthorne Absolute Constraints

Flood Zone 3b (Functional Floodplain)

65. Section 18 of the NPPF states that the policies in that section seek to minimise risks to development arising from all sources of flooding and coastal change, taking into account the impacts of climate change, by steering development away from areas of risk, ensuring that development will be safe for its lifetime without increasing flood risk elsewhere. The PPG Note *Flood Risk and Coastal Change*[13] sets out which types of developments are inappropriate within different fluvial flood zones based on their

[13] https://www.gov.uk/guidance/flood-risk-and-coastal-change

vulnerability. All development except for water compatible development or essential infrastructure which has passed the exception test is inappropriate in zone 3b (functional floodplain). As such, any site entirely within flood zone 3b will be excluded from the assessment unless it is considered to be water compatible or essential infrastructure which has passed the exception test.

66. For sites that are partially within zone 3b, only the portion of the site outside of zone 3b will be assessed, subject to the flood zone constraints as set out in the 'Constraints Affecting Suitability' section of this SLAA.

67. For traveller accommodation, flood zone 3a would be considered an absolute constraint due to the highly vulnerable nature of such accommodation.

Sites of International and National Nature Conservation Importance

68. Both Runnymede and Spelthorne contain sites which have been designated for their nature conservation importance either at an international or national level. Internationally designated sites include Special Protection Areas (SPA), Special Areas of Conservation (SAC), Sites of Special Scientific Interest (SSSI) and Ramsar sites. SPAs are designated for their importance to rare bird species and SACs for rare habitats and other non-bird species. SSSIs may be designated for a variety of reasons including for wildlife, habitat or geological features or a combination. Ramsar sites are designated wetland sites which are home to rare species of birds. Nationally designated sites include Sites of Special Scientific Interest (SSSI), which can be for wildlife, habitat or geological features, or a combination of these

69. Both Spelthorne and Runnymede include areas of the Southwest London Water Bodies SPA and Ramsar site which is designated for overwintering bird species of Shoveler and Gadwall. Parts of Runnymede are also within close proximity of the Thames Basin Heaths SPA and Thursley, Ash, Pirbright and Chobham Common SAC, which have been designated because of their heathland habitats and ground nesting bird species Woodlark, Nightjar and Dartford Warbler.

70. Given the high level of protection afforded to international and national sites of nature conservation importance, sites that come forward within these areas will be excluded from the assessment, unless the proposed uses are for BNG or SANG purposes.

Additional absolute constraints in Runnymede

Suitable Alternative Natural Greenspace (SANGs)

71. The borough's SANGs have an essential purpose in mitigating against the impact of new residential development on the Thames Basin Heaths Special Protection Area. The Council maintains these areas to a standard specified by Natural England. Development of these sites is likely to diminish their value as SANGs considerably which could impact on their ability to continue to be used for this essential mitigation, which should be secured in perpetuity. However, it is possible for BNG measures to be delivered on SANG land if such habitat creation or enhancement provides measurable additionality over and above the minimum SANG requirements and BNG features do not conflict with the principal purpose of the SANG.

Ancient Woodland

72. Through the Ancient Woodland Inventory carried out in 2011, several ancient woodland areas in Runnymede have been identified (and these have 15m buffer zones around them). These areas have a high level of protection and development on such areas should be ruled out unless exceptional circumstances can be demonstrated. This approach aligns with NPPF Policy N6(2) and policy EE9 of the adopted Runnymede 2030 Local Plan.

Additional absolute constraints in Spelthorne

Public Safety Zone - Heathrow

73. Policy SP7: Heathrow Airport of the Spelthorne Local Plan seeks to the public safety zone at the west end of the southern runway at Heathrow as defined by the Civil Aviation Authority. The policy sets out that development will be refused which leads to an increase in people living, working, or congregating in the Public Safety Zone. Given that the safety zone is unlikely to change in the foreseeable future, any site identified within the safety zone as defined on the Spelthorne Policies Map will be excluded[14].

Runnymede & Spelthorne Constraints Affecting Suitability

Green Belt

74. As already set out, a large proportion of the land across Runnymede and Spelthorne is designated Green Belt and both local and national policy strongly restricts development on such land unless very special circumstances can be demonstrated in line with the purposes of Green Belt designation.

75. Policy GB3(1) of the NPPF (2026) states that 'Green Belt boundaries should only be altered through the preparation and updating of local plans and where exceptional circumstances are fully evidenced and justified (other than where paragraph 4 of this policy applies)'. Policy GB3(2) of the NPPF sets out a clear process for examining options before assessing Green Belt. This includes: a. Making as much use as possible of suitable previously developed and underutilised land; b. Optimising the density of development in accordance with policy L1; and c. Assessing whether sufficient suitable sites can be identified outside the Green Belt.

76. After this assessment of the existing urban area, Policy GB3(4) states that 'Where a development plan's spatial strategy has identified suitable land around well-connected stations for development, exceptional circumstances do not need to be demonstrated to justify altering Green Belt boundaries'. This means that land that is around well-connected stations can be removed from the Green Belt if it is found to be suitable for development.

77. Although development in the Green Belt is restricted by local and national policy it is considered a policy constraint that could be overcome through the preparation of a Local Plan, and as such is not an absolute constraint for the purposes of the SLAA, for example, NPPF Policy GB6(3) sets out how renewable energy generation can be considered as part of a Very Special Circumstances case for developments of this type

14 https://spelthorne.maps.arcgis.com/apps/instant/basic/index.html?appid=6d24a587c81c46fab8359117a11bccb7

in the Green Belt. Policy GB6 also sets out a number of other types of development that are not inappropriate development in the Green Belt. However, a distinction needs to be made between how sites which Previously Developed Land (PDL) are, could be classified as Grey Belt, and those that are undeveloped Green Belt are assessed in the SLAA.

78. Where a site in the Green Belt is partially PDL, only the previously developed portion will be considered suitable in the first instance and assessed on a case-by-case basis. Grey Belt sites (discussed in more detail below) will be determined using the findings of the Council's Green Belt Assessment. Sites in the Green Belt that do not contain PDL and not considered to be Grey Belt will be subject to a two-stage assessment approach. This will involve the following:

    - Stage 1: In the initial SLAA iteration, such sites will undergo limited assessment and will not be considered suitable unless policy changes are proposed. This prioritises PDL.
    - Stage 2: If the Council decides to explore the potential for undeveloped Green Belt release through the Local Plan a further iteration will assess these sites in more detail focussing on sustainability and Green Belt performance. This staged approach reflects the cyclical nature of SLAA updates as outlined in the PPG.

Grey Belt

79. The 2026 NPPF includes the concept of 'Grey Belt', which is defined in the Glossary as: 'For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in policy GB2.'

80. After assessing land within the existing urban areas and then suitable land in the Green Belt around well-connected railway stations (as noted above), Policy GB4(1)(d)(i) of the NPPF makes it clear that priority should be given to previously developed land in the Green Belt, followed by Grey Belt, which is not previously developed, and then other Green Belt locations. To support this approach Runnymede and Spelthorne Councils are undertaking assessments of their Green Belt boundaries.

81. The Government expects all Local Planning Authorities reviewing Green Belt boundaries to identify where land is Grey Belt, dividing the Green Belt land into separate assessment areas to analyse the extent to which this land strongly contributes to Green Belt purposes (a), (b) or (d), using criteria provided in the PPG. Any sites identified as meeting the criteria for Grey Belt through the assessment process, and which are subsequently found to have development potential following consideration of wider planning matters, will have their development potential assessed in the SLAA.

Garden centres

82. In the previous SLAA methodology, a consistent approach was needed to assess the potential of garden centres for development. It was proposed that unless there was an established lawful use for the site of retail / residential by the way of a Certificate of Lawfulness, the site would be treated as being in horticultural use and, as such, was not considered to be previously developed land for the purposes of the SLAA. With the publication of the 2026 NPPF, garden centres or horticultural greenhouses might be reclassified as Grey Belt land depending on how the site performs against Green Belt

purposes. The findings of the Councils Green Belt Assessment will therefore inform the assessment of garden centres.

Flood Risk

83. Whilst flood zone 3b remains an absolute constraint to development, sites within lower risk flood zones may be considered suitable depending on the vulnerability of the use proposed, provided it does not conflict with the requirements of NPPF Policy F6(1)(a) which advises that 'Development proposals should be refused if the use is incompatible with the risk from river or sea flooding, as set out in Annex F, table 3'. This also applies to NPPF Policy F7 which sets out a series of circumstances where development permission should be refused, unless for example 'It can be demonstrated that flood risk will not be increased elsewhere'. A significant proportion of land in Runnymede and Spelthorne is at risk from flooding.

84. Development plans should take a risk-based approach when identifying suitable locations for development, taking into account all sources of flood risk and the current and future impacts of climate change (NPPF Policy F2(1)).For SLAA purposes, sites at risk from any source of flooding (whether this be fluvial, groundwater, reservoir or surface water flooding) will only be considered deliverable in years 1-5 if there is clear evidence that the development can be made safe for its lifetime, flood risk can be mitigated without increasing flood risk elsewhere.

85. The evidence available at the time of the assessment will inform where a site might be placed in terms of delivery over the next 15 years. Only sites with evidence to support delivery and overcoming flood risk will be included in years 1-5. Flood Risk will need to be considered through the SLAA process to rule out any constrained land and to restrict yields accordingly where appropriate, but more detail will be expected on flood risk and mitigation as sites which are deemed suitable for development progress through the planning process. Site-specific flood risk screening for sites may include:

    - Proximity to watercourses
    - Historical flood events
    - Topography and drainage patterns
    - Existing flood mitigation infrastructure
    - Mapped flood risk – Fluvial, Surface water, Reservoir risk

86. Existing surface water flow routes must be considered, as development could disrupt natural drainage patterns. These routes may influence site layout and reduce the developable area. The Environment Agency's updated Risk of Flooding from Surface Water (RoFSW) should be consulted during site assessment, incorporating SuDS may help to retain flow routes and manage runoff.

87. Generally, in Runnymede, sites in flood zone 3a or which are found to be at risk from other sources of flooding will not be included within the 'deliverable' housing supply unless they have planning permission and have demonstrated through the planning process which includes consultation with statutory and other relevant consultees, that flood risk can be mitigated for the lifetime of the site without increasing flood risk elsewhere. This also applies for sites which are at high risk of surface water flooding (as defined by the Environment Agency). However, such sites may be included in the 'developable' supply i.e. from year six onwards, if a flood risk assessment and mitigation strategy is provided during the planning application process.

88. In relation to other sources of flooding, (which relate to other sources of flooding as opposed to fluvial sources of flood risk) whilst this will need to be examined at the planning application stage, for the purposes of the SLAA, it is considered that it will not be possible to provide an in-depth analysis for individual sites. The Planning Practice Guidance states that 'During the site survey the following information can be recorded… physical constraints (e.g. … flood risk)', but it does not specify or require that all forms of flood risk need to be assessed. Below is a summary of the other sources of flooding in both boroughs which may impact on the suitability of development on sites:

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

89. Developers / applicants are advised to consult the latest Strategic Flood Risk Assessment of each authority for more information about the different flood risk is in each borough. Developers / applicants should also check up-to-date data with the EA/flood risk maps. During the site selection process, a more detailed assessment of the different types of flood risk affecting each SLAA site will be considered as part of the Strategic Sequential Test.

90. In Spelthorne, sites in flood zone 3a may be included in the 'deliverable' supply i.e. years 1-5, if there is robust evidence that flood risk can be overcome (excluding highly vulnerable development as set out in Table 2 of the Planning Practice Guidance and the site has safe access and egress). This typically applies to sites with planning permission or those that have progressed through advanced pre-application discussions. Other sites will be included in the 'developable' supply, subject to further assessment.

Watercourses

91. Any site within an existing watercourse, or adjacent to one, will need to apply an appropriate buffer zone to restrict development to allow maintenance access and provide any nature floodplain function.

River Thames Scheme (Egham to Teddington) Safeguarding Areas

92. The River Thames Scheme is a major infrastructure project aimed at reducing flood risk between Egham and Teddington. It includes a new river channel to be built in two sections - through Runnymede (between Egham Hythe and Chertsey) and through Spelthorne (between the River Thames at Laleham before meeting Littleton North Lake and upstream of Desborough Cut).

93. Whilst the exact location of the flood channels has not yet been determined, the EA has indicated broad areas which should be safeguarded. This has support under Policy F2(1)(b) of the NPPF which states that Local Planning Authorities should manage any residual risk by: 'Safeguarding land that is, or is likely to be, required for current or future flood management'.

94. Sites within these proposed safeguarded areas for the River Thames Scheme will not be considered suitable for development at this stage. However, they will not be excluded from the SLAA entirely, particularly where proposed uses include SANG and/or BNG, and the constraint may be reassessed once final scheme details are available.

Waste and Minerals sites

95. Waste and Minerals planning matters are currently the responsibility of Surrey County Council. However, Local Government Reform is expected to see Spelthorne and Runnymede form part of the new West Surrey Unitary Authority, to which these functions will transfer. Whilst plan-making responsibilities are expected to remain with individual local planning authorities for the time being, ongoing coordination with the emerging unitary authority will be necessary to ensure the effective integration of Waste and Minerals planning considerations into Local Plan preparation.

96. Policy M1 of the NPPF states that 'The development plan should provide for a sufficient and timely supply of minerals of national and local importance' and Policy M2 says that development plans should 'Where necessary to prevent the sterilisation of mineral resources, require the prior extraction of minerals on sites allocated for non-mineral development, where practical and environmentally feasible'.

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

'When determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that the likely impact of proposed, non-waste related development on existing waste management facilities, and on sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities…'

98. Whilst safeguarded sites or allocations for minerals and waste are not absolute constraints, Runnymede and Spelthorne will discuss with Surrey County Council any assessment of sites submitted to the SLAA which fall within a mineral safeguarding area or may impact on both existing and allocated minerals and waste sites and infrastructure used for minerals development. Such sites will not normally be found suitable for housing or economic development, however for comprehensiveness they will not be excluded from the assessment.

99. The local context for defining mineral safeguarding areas, allocated and existing sites for minerals and waste development and safeguarding infrastructure for minerals development can be found in policy MC6 of the Surrey Minerals Plan Core Strategy (2011)[15] and policy 7 of the Surrey Waste Local Plan 2019-2033[16]. It should be noted that there will also need to be regard to any proposed site allocations in the emerging Surrey Minerals and Waste Local Plan[17], once these have been put forward.

100. The Surrey Minerals Plan 2011: Minerals Site Restoration Supplementary Planning Document (July 2011) provides guidance on preferred after uses and best practice in restoration techniques. This will be considered when assessing SLAA sites that overlap with minerals allocations. Surrey County Council has also produced a

[15] Surrey Minerals Plan Core Strategy (2011). Available at: https://www.surreycc.gov.uk/land-planning-and-development/minerals-and-waste/minerals-core-strategy-development-plan
[16] Surrey Waste Plan (2020). Available at: https://www.surreycc.gov.uk/land-planning-and-development/minerals-and-waste/waste-plan
[17] https://www.surreycc.gov.uk/land-planning-and-development/minerals-and-waste/local-plan

consultation protocol[18] for boroughs and districts, which includes background information, and a list of allocated sites in Runnymede and Spelthorne.

Agricultural land

101. Policy N1(1)(c) of the NPPF advises that development plans should:

'Steer the location of development, including through site allocations, in ways which utilise land of least environmental value where that would be consistent with other policies in this Framework. This should include limiting the scale and extent of development within Protected Landscapes, avoiding the use of higher quality agricultural land where land of poorer quality is available…'

102. Policy N2(1)(b) of the NPPF then states that development proposals should 'Take into account the quality of agricultural land (including that classified as best and most versatile agricultural land, and its grade), and if significant development of agricultural land is necessary, use areas of poorer quality land where possible'.

103. In line with national policy, both authorities aim to protect those agricultural sites that are of the best quality. Runnymede has already assessed agricultural land quality as part of its 2017 Green Belt Review, and this will be revisited in future evidence updates. SLAA assessments will consider agricultural land classification, and sites on Best and Most Versatile land will generally be considered unsuitable for development, though they will be included in the SLAA for comprehensiveness.

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

104. Sites of international or national ecological importance are considered absolute constraints. Within Runnymede, there is a general restriction on net additional dwellings within 400m of the Thames Basin Heaths SPA due to recreational and urbanising impacts. Residential sites within this buffer will be considered unsuitable, though not excluded from the SLAA. Exceptions may apply economic purposes or C2 uses with high dependency residents where recreational impacts are minimal.

Biodiversity Buffer Zone

105. The Environment Agency requires a minimum 8m buffer zone (and encourages 10m) around all rivers, to support biodiversity and allow access for maintenance purposes. The buffer must remain free of structures, hard standing (including car parks), formal footpaths, fences, overhanging development such as balconies and should not include formal landscaping. It should be retained as natural habitat to support ecological networks and watercourses.

106. As such, any site submitted to the SLAA that includes land within or on the 8m buffer of a river, will have that portion excluded from the developable area. Site capacity will be adjusted accordingly to reflect this constraint.

107. The Basingstoke Canal Authority recommends a 5-8m undeveloped buffer zone alongside the canal. This buffer should function as green infrastructure and support

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

habitats of biodiversity value. Development proposals adjacent to the canal will need to respect this guidance.

Conservation Areas and Heritage Assets

108. Runnymede and Spelthorne both contain designated Conservation Areas, which are protected under the Planning (Listed Buildings and Conservation Area) Act 1990. While development is not precluded within these areas, proposals must demonstrate how the character, appearance, and setting of the Conservation Area will be preserved or enhanced.

109. The assessment of sites within or adjacent to Conservation Areas or other heritage assets including Statutorily Listed Buildings, scheduled monuments and Locally Listed Buildings will consider potential using Historic England Historic Environment and Site Allocations in Local Plans Advice Note 3 and must take account of NPPF Policies HE6 and HE7, which sets out the weight that should be given to the impacts (positive or negative) on heritage assets.

Public open space

110. Runnymede published an updated Open Space Study (OSS) in 2025, whilst Spelthorne's Open Space Assessment was published in 2019. A new Open Space Assessment is currently being produced as part of the new Spelthorne Local Plan. Open spaces identified in these studies (or any future updates) will be considered a significant constraint to housing and economic development (in line with NPPF Policy HC7) unless it can be demonstrated that the land is surplus to requirement, or the provision could be replaced by:

- equivalent or better open space or public service infrastructure provision in terms of quantity and quality, in a location which offers comparable or improved accessibility for the community it serves,
- or the development is for open space, sports and recreational buildings and land, the benefits of which clearly outweigh the loss of the current or former use.

Spelthorne Specific Constraints Affecting Suitability

Heathrow Airport Noise Contours

111. Policy SP7 of the Spelthorne Local Plan seeks to manage the impact of aircraft noise from Heathrow Airport. The Policy seeks to refuse the development of new residential development where aircraft noise levels are at or exceed 66Leq. The 66Leq noise contour is shown on the Spelthorne Policies Map. As such, any site identified for net additional dwellings within or on the 66Leq noise contour will not be considered suitable.

112. The potential expansion of Heathrow Airport, including the delivery of a third runway and associated airspace changes, could result in future alterations to aircraft flight paths and noise exposure across the area. Given the uncertainty surrounding the extent and timing of these changes, sites located within, or immediately adjacent to, the current 66 dB LAeq noise contour will be considered unsuitable for residential development at this stage. However, such sites will not be excluded from the SLAA, recognising that future decisions regarding Heathrow expansion, aviation noise

mitigation measures and updated noise contour modelling may warrant reassessment of their suitability.

Other Considerations Affecting Suitability or Capacity

113. Other considerations that may affect the suitability or capacity of a site - either in part or in whole in the Runnymede or Spelthorne SLAA include physical and other environmental constraints. These may include (but is not limited to) site access and visibility, presence of utility infrastructure, contaminated land, or neighbouring amenity.

114. For sites considered for Gypsy and Travellers and travelling Showpeople, additional factors such as access to storage, privacy and security requirements will be considered. As these constraints vary by site, they will be assessed individually and in accordance with the relevant saved policies in the adopted Runnymede 2030 Local Plan and Spelthorne Local Plan 2024-39/40, alongside national policy in the NPPF and the Planning Practice Guidance.

Step 3: Is the site available?

115. The site submission proforma will help establish availability by identifying ownership and any legal issues. It will also indicate whether the site is currently available or may become available in the future. If there are barriers to availability, the proforma should help determine whether these can be addressed to enable development.

116. The PPG (Housing and Economic Land Availability Assessment) advises that ‘consideration can also be given to the delivery record of the developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions’ (paragraph 19). Note that an extant planning permission does not guarantee availability, as applications can be made without site ownership. These factors will be considered on a site-by-site basis.

117. Where either authority identifies a site with potential, but questions remain about its availability land registry searches will be conducted landowners contacted. If the owner indicates the site could be developed now or at some point in the future, it will be assessed using the methodology criteria.

Step 4: Is the site achievable?

118. A site is considered achievable for development if there is a reasonable prospect of development at a particular point in time. This requires testing economic viability, which can be challenging without knowing the scale of development., Officers estimate development potential where necessary.

119. When estimating a site’s potential, officers will refer regard will need to be had to the or Housing and Economic Development Needs Assessment (HEDNA) for the borough in question to determine appropriate dwelling types and sizes. Consideration will also be given to density, accessibility, and open space / playing space requirements.

120. Where officer assumptions on site yield align with those of the landowner or agent, the site will be considered achievable. Where there is disagreement, officers will seek

further information to determine whether the site remains viable at lower yields or for alternative uses.

121. Targeted consultations with developers and landowners will support officers in forming realistic viability assessments based on the site's development potential.

122. The final SLAA report will also include a site book showing maps of each of the SLAA sites together with a completed officer site assessment form completed in accordance with the above steps (containing the type of information set out in Appendix 1 to this report).

Housing Densities & Accessibility

123. The PPG states that LPAs can include locally determined policies on density but that when assessing development potential, plan makers should seek to make the most efficient use of land in line with policies set out in the NPPF (particularly Policies L1-3, which set out how density should be approached for different types of sites).

124. The adopted Runnymede 2030 Local Plan does not prescribe a set density for developments but instead sets out, in Policy EE1: Townscape and Landscape Quality, that all development proposals need to achieve high quality and inclusive design which responds to the local context while making efficient use of land.

125. Policies L1 - L3 of the NPPF set out that Government wants the planning system to support the 'effective and efficient use of land' L3(2)(c) goes further by saying that: residential or mixed-use schemes are within reasonable walking distance of a well-connected station (applying the definitions in the glossary at Annex B), a density of at least 35 dwellings per hectare should be achieved within the net developable area of the site. Higher densities – of at least 45 dwellings per hectare – should be achieved where the service frequency is at least twice that of the minimum required for a well-connected station'.

126. To help do this, Runnymede will undertake a couple of steps including:

- Establishing the density baseline of development in the borough, by identifying different density character areas within each settlement area (looking at the residential areas only, so as not to have the residential density diluted by non-residential uses such as shops, schools, parks etc.) and then determining the typical dwellings-per-hectare densities within each.
- Apply optimised density ranges, ensuring that the approach is not excessively optimistic, but still includes an uplift on the existing density of an area to meet the requirements of the NPPF.

127. Policy ST2: Planning for the Borough of the newly adopted Spelthorne Local Plan sets out that *'the Council expects that all development proposals located within or adjacent to town/local centres or a public transport interchange will seek to optimise the density of development, in order to make the most efficient use of the land in the most sustainable locations'.*

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

129. In addition, the Spelthorne Design Code (adopted 17 March 2026) provides a framework to support high-quality design in the borough, which is reflective of local character and design preferences. This does not set out specific densities but sets out principles on design and development types, including density to make the most efficient use of land.

130. Certain locations in both Runnymede and Spelthorne will be highly accessible to a range of public transport options or to areas benefitting from key services and employment opportunities. These areas, such as town centre locations, should be considered for higher density developments. As such, both authorities will seek to take advantage of the sustainability credentials of such areas and take account of the accessibility of sites to public transport and key services / employment opportunities when assessing site densities.

131. As such, SLAA densities will need to be assessed on a site-by-site basis to consider a suitable density/density range for development. This assessment will be made in line with Policies L1 - L3 of the NPPF and planning practice guidance, any relevant local policies and design guidance, and any adopted Borough Design Codes.

Air Quality

132. Runnymede has two Air Quality Management Areas (AQMA); one along the M25 and another in Addlestone Town Centre. Spelthorne has a single AQMA covering the whole of the borough, designated due to exceedances of NOx in certain areas.

133. Sites within AQMAs must be assessed in accordance with P3(2)(C) of the NPPF and relevant local plan policies. Consideration should also be given to both Runnymede's Air Quality Action Plan[19] and Spelthorne's Air Quality Action Plan[20] where appropriate.

Stage 3: Windfall assessment (for residential development)

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

135. The supply calculation in any housing trajectory produced will include an allowance for windfalls in the 1-5 and 6-10 year housing land supplies (as noted by NPPF Policy HO3(2) if there is 'compelling evidence that they will provide a reliable source of supply'), as windfall development has consistently formed a significant part of the housing supply in both boroughs and is likely to continue to do so. This is evident through analysing the previous SLAAs and looking at historic windfall delivery rates.

[19] https://www.runnymede.gov.uk/pollution/air-quality-1/3
[20] Spelthorne Air Quality Action Plan, https://www.spelthorne.gov.uk/media/27415/Air-Quality-Action-Plan-2024-2029/pdf/Air_Quality_Action_Plan.pdf?m=1733918009983

Runnymede

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

Spelthorne

137. The windfall figure will be derived from averaging housing delivery from sites of four units or less over the preceding five or more years. This average figure is included within the housing trajectory. To avoid double counting, sites with planning permission will not be considered in the SLAA and instead a small sites allowance will be factored into the calculation of supply.

Sites without planning permission

138. Previously, the approach to sites without planning permission was to include them in the trajectory if there was some evidence that they could deliver units in the first five-year period of the trajectory, but with an under-delivery discount applied to them. This was following the approach set out in an earlier version of this methodology, and which underpinned the development the trajectory used in the Runnymede 2030 Local Plan examination.

139. However, this plan was examined under the 2012 NPPF, which had the following definition of deliverable at footnote 11 to paragraph 47:

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

140. This is far less detailed than the current definition set out in the 2026 NPPF Glossary which is as follows:

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

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

141. Due to the more recent definition of deliverability from the 2026 NPPF being more detailed and specific than the 2012 and even the 2024 version, with an emphasis on sites with planning permission, but more importantly, the emphasis in point b) of there being a need for 'clear evidence' that completions **will be delivered on-site** [RBC emphasis] (compared to 'clear evidence that housing completions will begin' in the 2024 definition) for certain listed types of site within five years, the Councils will ensure that sites included in the five year housing land supply (5YHLS) trajectory meet the stricter tests of deliverability set out in the current definition. This will ensure that there is greater certainty that they will provide units within the five-year timeframe, but due to this, a discount will no longer applied, due to this greater certainty that the sites included will deliver the full number of units set out in the trajectory.

Permitted Development (PD)

142. Since May 2013, developers have been able to seek permission to convert certain commercial properties – primarily offices, light industrial units, and shops – into residential use via a streamlined 'prior approval' process.

143. From the start of 2020[21], the Government introduced significant changes to town centre use classes, consolidating various uses such as offices, restaurants and shops, professional services and light industrial combined into a single new category, class E.

144. From 1 August 2021 legislation allowed buildings within use class E to convert to residential use (class C3) without a full planning application. In February 2024, amendments to Class MA rights removed the 1,500sqm size limit and the three-month vacancy requirement. However, buildings must have been in Class E use for at least two years to qualify.

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

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

146. Permitted development rights have significantly influenced housing delivery in both boroughs since their introduction in May 2013. In Runnymede a significant proportion of these get implemented, and it is noted in the most recent Runnymede HEDNA that the Borough has been particularly affected compared to others, which is starting to have a negative impact on employment areas of the Borough. However, not all prior approvals are implemented, as some may be speculative i.e. intended to assess potential value rather than proceed to development.

[21] https://www.planningresource.co.uk/article/1701908/no-size-limit-new-town-centre-to-residential-use-permitted-development-right

147. From 6 April 2021, all homes built under permitted development rights must comply with nationally prescribed space standards. This requirement may reduce the number of PD conversions, as it could make such developments less attractive to some developers. However, as noted above, as of the 5 March 2024, the 1,500sqm limit on office to residential permitted development rights was removed, which may result in future dwellings coming forward via this route, but at the expense of the supply of employment floorspace and potential affect the vitality and viability of employment areas.

148. Despite potential limitations, PD conversions are expected to continue contributing significantly to housing delivery in both boroughs. Accordingly, housing trajectories will incorporate this source of supply.

Student accommodation and accommodation for older people

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

150. The PPG (Housing Supply and Delivery) states that purpose-built student accommodation can contribute to housing land supply. In assessing the amount of housing that may be released by purpose-built student accommodation, officers at RBC will consider the:

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

151. This approach applies to both communal establishments for students and to multi-bedroom self-contained student flats. Calculations will be based on census data, in line with the PPG and incorporated into the SLAA.

152. Similarly, purpose-built housing for older people can contribute to the five-year supply. Residential institutions within Use Class C2 will be assessed for their potential to release housing using data from the most recent Census.

Conclusions on site assessments

153. Detailed assessments of achievability and deliverability will not be undertaken for new sites deemed unsuitable or unavailable in earlier stages. However, if such sites, later meet criteria; they will be reassessed in future iterations.

154. Runnymede Borough Council will seek feedback on SLAAs prepared as part of Local Plan preparation process through the consultation stages. As such, the initial version of the document that is published is likely to be branded as an interim version and will be amended as appropriate following the consideration of comments from key stakeholders, including the development community.

155. Spelthorne will publish the SLAA annually in order to maintain a list of potential development sites as the Local Plan is developed. As the SLAA is a technical document, engagement on its findings will be focused on key consultation stages of the Local Plan, with further engagement undertaken as part of the site selection process.

156. Decisions on site allocations will be made through each authority's Local Plan process, not the SLAA itself. Inclusion in the SLAA does not imply that a site will be allocated or granted planning permission. The SLAA serves as an audit of potentially developable sites.

Stage 4: Assessment review

157. The PPG states at paragraph 24[22]: 'Once the sites and broad locations have been assessed, the development potential of all sites can be collected to produce an indicative trajectory'. This should set out how much housing and the amount of economic development that can be provided, and at what point in the future (i.e. within years 1 to 5, years 6 to 10, and 11 and beyond). An overall risk assessment should be included setting out whether sites will come forward as anticipated.' However, in line with paragraph 8 of Annex D of the 2026 NPPF, trajectories will be produced annually as the local planning authorities should identify and update annually a supply of specific deliverable sites. This should be sufficient to provide a minimum of five years' worth of housing, assessed against their housing requirement in the development plan, or against their local housing need (calculated using the standard method) where the development plan housing requirement is more than five years old.

158. Local Housing Need (LHN) is calculated by the Government's standard method and provides an up-to-date measure of housing need. Deliverable sites expected to come forward within five years are compared against the LHN to determine whether a five-year housing land supply exists.

159. If a shortfall is identified between the LHN and housing land supply, the assessment will be revisited to identify additional sites or revise assumptions. If the shortfall persists, the PPG (Housing and Economic Land Availability Assessment) advises that authorities should plan how best to address it.

160. Although there is no requirement to identify a five-year supply of sites for economic uses, the SLAA will help identify suitable sites in both boroughs. This will support joint working with other Local Authorities identified in the FEA to meet identified economic needs.

161. If a shortfall in housing or economic land supply is identified, the Councils may undertake the following steps:

- Sites that have not been assessed in detail should be re-examined to establish whether they can be reconsidered dependent on, for example, the outcome of discussion with the landowner / agent on how they could overcome identified non-absolute constraints.
- Reconsider density and suitability assumptions.

[22] https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment

- Investigate other housing and planning policy options that have the potential to increase the delivery of housing, for example consider the release of designated employment sites.
- Investigate smaller sites than that set out in the PPG.
- Broad locations for development may need to be re-considered, dependent on the evidence the Councils have collected.
- Only should the above steps fail to address the shortfall, both Councils continue discussions with neighbouring Authorities, in particular those within the FEA and HMA in the first instance, as to whether they can meet any identified shortfalls.

Stage 5: Final evidence base

162. Both Councils will produce a housing and (separately) a pitch and plot trajectory annually as required by Annex D of the NPPF. Trajectories will seek to illustrate the distribution of sites for different types of residential uses during 1-5-year periods. These will ultimately form part of the 1-5- and 6-10-year trajectories that will need to be demonstrable when the Council's Local Plans are prepared, as required by NPPF Policy HO3.

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

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

164. Spelthorne BC will also produce a digital map showing all sites assessed through the SLAA and their categorisation including discounting status and anticipated delivery timeframe. Runnymede also produces a digital map which sets out the sites contained within the SLAA (and its reference number) and will be seeking to have future iterations contain further information as and when this is possible.

165. A draft SLAA report will be published for stakeholder review including neighbouring authorities within the HMA and FEMA prior to finalisation. The assessment will be published on the relevant Council's website to ensure it is publicly available.

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

167. SLAA conclusions will inform emerging Local Plans, helping determine whether sufficient land is available to meet identified needs. Final decisions on site allocations will be made through the Local Plan process, which includes full consultation and independent examination.

168. Each Council will update its SLAA annually during Local Plan preparation, in line with the PPG. Once sites are allocated, monitoring will continue in accordance with Policy PM1(2)(i) of the NPPF. Progress will be reported annually via each Council's Authority Monitoring Report.