To:
All members of the Environment and Sustainability Committee

Please reply to:
Contact: Christeen Abee
Service: Committee Services
Direct line: 01784 446224
E-mail: c.abee@spelthorne.gov.uk
Date: 12 March 2026

Supplementary Agenda

Environment and Sustainability Committee - Monday, 16 March 2026

Dear Councillor

I enclose the following items which were marked 'to follow' on the agenda for the Environment and Sustainability Committee meeting to be held on Monday, 16 March 2026:

3. Adoption of the Spelthorne Local Plan **3 - 452**

Committee is asked to:

1. Note that the Council is still under Direction 3 as set out in the letter from the Minister of State for Housing and Planning dated 14 September 2023 that requires on conclusion of the examination of the Plan that consideration is given to adopting the Plan, including any main modifications recommended by the Planning Inspector.
2. Note the contents of the Inspector's Report on the Examination of the Spelthorne Local Plan.
3. Recommend to Council the adoption of the Spelthorne Local Plan 2024-2039/40, which incorporates the Main Modifications, as set out in the Inspector's Report on the Examination of the Spelthorne Local Plan, and other Additional (minor) Modifications.
4. Subject to recommendation 3, recommended to Council that the Policies Map is adopted and published alongside the Spelthorne Local Plan 2024-2039/40.
5. Subject to recommendation 3, note the Spelthorne Local Plan 2024-2039/40 replaces the following documents and by adopting the Spelthorne Local Plan 2024-2039/40 they no longer form part of the Council's development plan:
    a. Core Strategy and Policies Development Plan Document (adopted 26 February 2009),

b. Spelthorne Allocations Development Plan Document (adopted 17 December 2009), and
c. Spelthorne Borough Loal Plan 2001 Saved Policies and Proposals as at 28 September 2007 (Updated December 2009).

6. Subject to recommendation 3, recommend to Council that delegated authority is given to the Deputy Chief Executive in agreement with the Chair of the Environment and Sustainability Committee, to agree any further (non-material) Additional Modifications to the Plan and its accompanying Policies Map before its publication.
7. Subject to recommendation 3, recommend to Council to accept the content of the Sustainability Appraisal/Strategic Environmental Assessment Report and Habitats Regulations Assessment: Addendum of Proposed Modifications, and publish them in accordance with Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004.

Yours sincerely

Christeen Abee
Corporate Governance

To the members of the Environment and Sustainability Committee

Councillors:

J.A. Turner (Chair)	J.P. Caplin	A. Mathur
J.R. Boughtflower (Vice-Chair)	D.C. Clarke	H.R.D. Williams
L. Barker	S.M. Doran	P.N. Woodward
M. Beecher	K.M. Grant	
T. Burrell	N. Islam	

Substitute Members: Councillors: C. Bateson, S.N. Beatty, H.S. Boparai and R.V. Geach

Committee Report Checklist

Please submit the completed checklists with your report. If final draft report does not include all the information/sign offs required, your item will be delayed until the next meeting cycle.

Stage 1
Report checklist – responsibility of report owner

ITEM	Yes / No	Date
Councillor engagement / input from Chair prior to briefing	**Yes**	**3/3/26**
Commissioner engagement (if report focused on issues of concern to Commissioners such as Finance, Assets etc)	**Yes**	**5/3/26**
Relevant Group Head review	**Yes**	**26/2/26**
MAT+ review (to have been circulated **at least 5 working days before Stage 2**)		
This item is on the Forward Plan for the relevant committee	**Yes**	**22/5/2025**
	Reviewed by	
Finance comments (circulate to Finance)		
Risk comments (circulate to Lee O'Neil)	**LO**	**06/03/26**
Legal comments (circulate to Legal team)	**WB** **LH**	**06/03/26** **11/03/26**
HR comments (if applicable)	**N/A**	**N/A**

For reports with material financial or legal implications the author should engage with the respective teams at the outset and receive input to their reports prior to asking for MO or s151 comments.

Do not forward to stage 2 unless all the above have been completed.

Stage 2
Report checklist – responsibility of report owner

ITEM	Completed by	Date
Monitoring Officer commentary – at least **5 working days before MAT**	**L Heron**	**11/03/26**
S151 Officer commentary – at least **5 working days before MAT**	**T.Collier**	**6/3/26**
Confirm final report cleared by MAT		

Environment and Sustainability Committee

16 March 2026

Title	Adoption of the Spelthorne Local Plan 2024-2039/40
Purpose of the report	To make a decision and a recommendation to Council
Report Author	Jane Robinson Local Plans and Infrastructure Manager
Ward(s) Affected	All Wards
Exempt	No
Corporate Priority	Community Addressing Housing Need Environment
Recommendations	**Committee is asked to:** 1. **Note** that the Council is still under Direction 3 as set out in the letter from the Minister of State for Housing and Planning dated 14 September 2023 (Appendix A) that requires on conclusion of the examination of the Plan that consideration is given to adopting the Plan, including any main modifications recommended by the Planning Inspector. 2. **Note** the contents of the Inspector's Report on the Examination of the Spelthorne Local Plan (included as Appendix B1 and B2). 3. **Recommend to Council the adoption of the Spelthorne Local Plan 2024-2039/40** (as set out in Appendix C), which incorporates the Main Modifications, as set out in the Inspector's Report on the Examination of the Spelthorne Local Plan, and other Additional (minor) Modifications (as set out in Appendix D). 4. Subject to recommendation 3, **recommend to Council that the Policies Map** (included as Appendix E) **is adopted** and published alongside the Spelthorne Local Plan 2024-2039/40. 5. Subject to recommendation 3, **note** the Spelthorne Local Plan 2024-2039/40 replaces the following documents and by adopting the Spelthorne Local Plan 2024-2039/40 they no longer form part of the Council's development plan: a. Core Strategy and Policies Development Plan Document (adopted 26 February 2009), b. Spelthorne Allocations Development Plan Document (adopted 17 December 2009), and

	c. Spelthorne Borough Local Plan 2001 Saved Policies and Proposals as at 28 September 2007 (Updated December 2009). 6. Subject to recommendation 3, **recommend to Council that delegated authority is given** to the Deputy Chief Executive in agreement with the Chair of the Environment and Sustainability Committee, to agree any further (non-material) Additional Modifications to the Plan and its accompanying Policies Map before its publication. 7. Subject to recommendation 3, **recommend to Council to accept** the content of the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) Report (as set out in Appendix F) and Habitats Regulations Assessment (HRA): Addendum of Proposed Modifications (as set out in Appendix G), and **publish** them in accordance with Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004.
Reason for Recommendation	The Council has a statutory duty to develop and maintain an up-to-date Local Plan. The Inspector issued his report on 4 March 2026 and has found Spelthorne Local Plan to be sound provided his recommended main modifications are made to it. In accordance with Direction 3 of the letter from the Secretary of State (14 September 2023) the Council is required: *"On conclusion of the examination, to consider adopting the plan, including any main modifications recommended by the Planning Inspector deemed necessary to make the plan sound".*

1. Executive summary of the report *(expand detail in Key Issues section below)*

What is the situation	**Why we want to do something**
• The Plan has been found sound, subject to the Inspector's recommended modifications. The Council now needs to resolve whether the Plan will be formally adopted.	• Adoption of the Plan will give the Council an up-to-date local plan providing a robust policy framework to guide development in the borough until 2039/40. • Once adopted, the Council will be able to demonstrate a five-year housing land supply against the housing requirement set out within the Plan, strengthening our position in planning decisions and appeals.
This is what we want to do about it	**These are the next steps**

• The Council needs to consider the adoption of the Plan in accordance with Direction 3 as set out in the letter from the Minister of State for Housing and Planning dated 14 September 2023 (included as Appendix A). • Adoption would ensure the Plan carries full statutory weight and replaces older policies.	• If the Council resolves to adopt the Local Plan it will take effect immediately and be used in the determination of planning applications.

2. Key issues

2.1 On 4 March 2026, the Council received the Inspector's Report on the Examination of the Spelthorne Local Plan ("Local Plan") ("the Report"). The Report (as set out in Appendix B1) was published on 5 March 2026. Receipt of the Inspector's Report completes the Examination of the Local Plan.

2.2 The Inspector concludes that, subject to the Main Modifications recommended in his Report, the Local Plan satisfies the requirements of Section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended) and provides an appropriate basis for the planning of the borough. He confirms that:

- the Duty to Cooperate has been met, and
- all other legal, procedural and regulatory requirements have been complied with and therefore finds the Plan is sound.

2.3 The recommended 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.

2.4 The Council remains subject to the Direction issued by the Minister of State for Housing and Planning on 14 September 2023 (as set out in Appendix A). This Direction requires the Council to consider adopting the Local Plan, including any Main Modifications recommended by the Planning Inspector deemed necessary to make the Plan sound.

2.5 It is now for the Council to consider adoption of the Local Plan (as set out in Appendix C) and the approval of the Policies Map (as set out in Appendix D).

At the same time, to also note the content of the final Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) Report (as set out in Appendix F) and Habitats Regulations Assessment (HRA) (as set out in Appendix G) and to agree their publication in accordance with Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004.

2.6 Once adopted, the Local Plan becomes part of the Development Plan for the borough. It will then form a key material consideration in the determination of all planning applications.

Local Plan Adoption Background

2.7 The current development plan for Spelthorne consists of:

- Core Strategy and Policies Development Plan Document (2009),
- Allocations Development Plan Document (2009),
- Spelthorne Borough Local Plan 2001 Saved Policies and Proposals,
- Adopted Proposals Map (December 2009).

These documents will be replaced upon adoption of the new Local Plan.

2.8 Under the Planning and Compulsory Purchase Act 2004, local planning authorities must prepare a local plan for their area. Local plans are expected to be in conformity with the Government's planning policy, of which the National Planning Policy Framework (NPPF) is the principal document. The most recent version of the NPPF was published in December 2024.

2.9 The Plan has been subject to five rounds of public consultation including:

- Regulation 18 Consultation on "Issues and Options" (2018)
- Regulation 18 Consultation on a "Preferred Options" (2019-2020)
- Regulation 19 Consultation on the "Pre-Submission Spelthorne Local Plan" (2022)
- Main Modifications Consultation (2025)
- Further Main Modifications (2025-2026)

2.10 On 29 November 2022, Spelthorne Borough Council submitted its draft version of the Spelthorne Local Plan to the Secretary of State for Levelling Up, Homes and Communities for examination. On 20 December 2022 Jameson Bridgwater PGDip TP MRTPI was appointed the Planning Inspector to examine the Plan.

2.11 The Examination Hearing sessions began on 23 May 2023 and ran until 25 May 2023. On 6 June 2023 a pause to the Examination of the Plan was agreed by an Extraordinary Meeting of the Council. The Council resolved to:

> *"formally request the Planning Inspector to pause the Examination Hearings into the Local Plan for a period of three (3) months to allow time for the new council to understand and review the policies and implications of the Local Plan and, after the three month pause, the Council will decide what actions may be necessary before the Local Plan examination may proceed."*

2.12 On 14 September 2023, the Minister of State for Housing and Planning set out directions in a letter (Appendix A) which prevented the Council from taking any step to withdraw the Plan from examination, and on conclusion of the examination directed the Council to publish the Inspector's report and to consider adopting the Plan, including any Main Modifications recommended by the Planning Inspector.

2.13 Following an Extraordinary Council Meeting on the evening of 14 September 2023, Councillors voted to:

> *"Extend the pause in the Examination timetable until the proposed changes to the National Planning Policy Framework (NPPF) have been published (expected in the Autumn) before determining the next steps and take immediate legal advice to confirm the validity of the Minister's directive."*,

The Inspector agreed to a further pause as per the request of the Chief Executive.

2.14 Following the Environment Agency signing a Statement of Common Ground in October 2024, the examination hearings resumed and ran between 28 January and 18 February 2025. Upon conclusion of the hearings, the Council produced proposed main modifications to the Plan in order to make it sound. These modifications were subject to public consultation between 3 April and 15 May 2025. The Council then summarised the representations received and produced a response to each. This summary and responses document was shared with the Inspector and published on 9 July 2025.

2.15 The Council was then made aware of a change in circumstances of site allocation AS1/011 Land at former Bulldog Nurseries, meaning the site was no longer deliverable for residential development. More information on the circumstances leading to this can be found in TOP011 Topic Paper 11: AS1/011 and Further Proposed Main Modifications (which can be viewed via this link). This change required the Council to propose Further Main Modifications to the Plan which were subject to a public consultation running from 14 November 2025 to 4 January 2026. The representations made during this consultation were submitted to the Inspector in early January 2026, along with officer responses to them.

2.16 The Inspector's Report was issued on 4 March 2026. The Council now needs to consider adopting the Plan. If adopted this Plan would, together with the Policies Map, replace the documents listed in paragraph 2.7 above as the development plan for Spelthorne Borough.

3. Options appraisal and proposal

3.1 The **preferred option is for the Committee to recommend to Council to adopt the Local Plan**.

3.2 Adoption would provide an up to date and robust planning framework to guide how new development and infrastructure comes forward in a sustainable manner in Spelthorne over the plan period of 2024-2039/40.

3.3 The Plan makes provision for 9,900 new dwellings over the plan period (an average of 619 per annum). Adoption would enable the Council to

demonstrate a five-year housing land supply. This in turn means the Council will have up-to-date policies to be used in decision-making.

3.4 The Plan also provides a strategy for providing necessary infrastructure to support the growth of the Borough.

3.5 The risks associated with adopting the Plan are low. The Inspector's Report concluded that *"with the recommended main modifications … the Spelthorne Local Plan satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act* ***and is sound****"*. As with all Local Plans, it should be noted that there is a six-week window following adoption of the Plan where a legal challenge to the decision to adopt the Plan could be made by making an application to the High Court.

3.6 Alternatively **the Committee could not recommend to adopt the Local Plan.**

3.7 This would mean that the Council would not be able to demonstrate a five-year housing land supply, engaging the tilted balance in decision-making. The tilted balance is where the presumption in favour of sustainable development is engaged. This means that planning permission must be granted unless the adverse impacts of a proposal would significantly and demonstrably outweigh its benefits when assessed against national policy taken as a whole. In practice, this greatly reduces the weight that can be given to the Council's existing (and much older) local planning policies and increases the likelihood that speculative or less suitable development proposals could be approved at appeal. The titled balance would continue to apply until an adopted Local Plan is in place and a five-year housing land supply can be demonstrated.

4. Risk implications

4.1 There is a significant risk of government intervention should the Council decline to adopt the Local Plan now that it has received the Inspector's Report, which concluded that *"with the recommended main modifications … the Spelthorne Local Plan …* ***is sound****"*. MHCLG cannot mandate the Council to adopt the Plan but has the authority to approve the Plan, which would then have the same weight as an adopted plan in decision making of planning applications.

4.2 In the event that central government assumes control of the Plan, the Council must reimburse the Secretary of State for any expenditure incurred in connection with this intervention.

4.3 There would be implications for reputational risk to the Council if the Local Plan was not adopted now that it has been found sound by the Planning Inspector.

4.4 Not having an adopted Local Plan will place the Council at significant risk of having to plan for a substantially higher housing requirement under the government's updated standard methodology. This would increase the annual housing requirement in the first five years of the plan from 757 homes per annum (631 plus the required 20% buffer) to 952 homes per annum (793 plus a 20% buffer). For remainder of the Plan period, the housing figure would increase from 631 to 793 homes per annum. The 20% buffer must be applied to the first five years because the Borough has failed the Housing Delivery

Test for the previous three years. Without an adopted Plan, the likelihood of speculative development at appeal increases significantly resulting in additional appeal costs and resourcing implications.

4.5 A number of key planning tools would also be delayed. The Design Code could not be adopted, the proposed Managing the Development of Houses in Multiple Occupation (HMO) SPD could not progress and the forthcoming Supplementary Planning Documents on Affordable Housing and Climate Change could not be adopted later in the year, thus limiting the Council's ability to secure high-quality development and robust mitigation measures.

5. Financial implications

5.1 If the Council decide not to adopt the Plan, there would be significant financial cost as set out in 4.1 and 4.2 above and money spent on the Examination (set out in 5.3) would be wasted.

5.2 Getting the Local Plan to this point has incurred significant costs in producing the lengthy evidence base and public consultation. The evidence base has cost over £360,000 to produce, plus additional costs such as £31,000 for Conservation Area Appraisal. Consultation (including software) and marketing has cost approx. £20,000.

5.3 Taking the Local Plan through Examination has incurred the Planning Inspector's fees (over £98,000 to 28 February 2026 and awaiting billing for final total), Legal fees (around £158,000 since 2020), Programme Officer fees (£14,100 to mid-March 2025 and awaiting billing for final total) and other associated costs including consultants appearing at Examination to provide advice (approx £40,000). This investment (£310,000 already and further to be billed) would be wasted if the Council opt not to adopt the Local Plan.

5.4 The below table summarises expenditure incurred to produce the Local Plan since the 2018/19 financial year to 2025/26 (end of Feb) financial year. The table below excludes staffing costs, relating to officer time, which would also add costs to the below. Costs relating to the Staines Development Framework, Staines Masterplan and Design Codes are also excluded.

Expenditure Type	**Total**
Evidence base	£362,297
Consultants at Examination	£40,036
Legal fees	£158,552
Planning Inspectorate	£98,072
Programme Officer	£14,100
Consultation (incl software) and marketing	£20,347
Critical Friend	£17,015
Conservation Area Appraisal	£31,000

	£741,419

5.5 There will be more costs incurred from invoices relating to expenditure incurred with the Planning Inspectorate and Programme Officer for the final months of the financial year.

6. Legal comments

6.1 The Planning and Compulsory Purchase Act 2004 (as amended) requires the Council to submit its proposed Local Plan to the Secretary of State for independent examination by an Inspector appointed by the Secretary of State. The Inspector is required to determine whether the proposed Plan has been prepared in accordance with the relevant legislation, is "sound" and the Council has complied with the "duty to cooperate".

6.2 The Inspector's Report has confirmed that all relevant legal requirements have been met, and the proposed Plan is sound. Consequently, the Council has two choices – to adopt the proposed Plan or to reject the proposed Plan. If Council chooses to reject the proposed Plan, the reasons for disagreeing with the Inspector's conclusion that the proposed Plan is sound and may be adopted will need to be clearly identified and substantiated.

6.3 The legal implications of not adopting the Local Plan means planning decisions are governed exclusively by national policies rather than local policies relevant to the Borough of Spelthorne and local requirements. The Planning and Compulsory Purchase Act 2004 (as amended) gives the Secretary of State powers to intervene – should the Council not follow the conclusion of the Inspector, it is highly likely that MHCLG will intervene.

6.4 Under the provisions of the Planning and Compulsory Purchase Act 2024 (as amended) a statutory challenge may be brought by an application to the High Court during a period of 6 weeks from the adoption date.

6.5 Adoption of the Local Plan is a matter for Council (Article 4 para 4.1(a) of the Constitution).

Corporate implications

7. S151 Officer comments

7.1 The S151 Officer confirms that all financial implications have been taken into account and that the preferred option and recommendations are fully funded from within the 2026-27 budget.

8. Monitoring Officer comments

8.1 The Monitoring Officer confirms that the relevant legal implications have been taken into account.

9. Procurement comments

9.1 External consultancy support for the preparation of the Plan was appointed with the assistance of the Procurement Team.

10. Equality and Diversity

10.1 An EIA was undertaken for the Local Plan. It is attached at appendix H.

11. Sustainability/Climate Change Implications

11.1 The adoption of the Local Plan will significantly strengthen the Council's ability to address the sustainability and climate change challenges facing the borough. The Plan embeds climate mitigation and adaptation across its strategic framework, explicitly setting out requirements to conserve and enhance the natural environment while "mitigating and adapting to climate change" in future development decisions. This will ensure that new growth is steered toward sustainable locations, incorporates low carbon and energy efficient design, and supports long-term resilience to known local risks such as flooding. Together, these measures will help reduce borough wide emissions, improve environmental quality, and enhance the resilience of communities and infrastructure.

11.2 Additionally, the Local Plan provides the hooks for the previously adopted 'Climate Change Supplementary Planning Document' that outlines the Council's expectations for sustainable design, energy efficiency, water management, and biodiversity enhancement. Considered together, these frameworks will provide a coherent, legally robust foundation for driving sustainability improvements across the borough.

12. Other considerations

12.1 As outlined in the Inspector's Report and reflected in the introduction of Policy ST3, the Immediate Review policy means that the Council must review the Local Plan and submit an updated or replacement Plan for examination within two years of adoption. This requirement reflects the Inspector's recognition that the Plan provides a sound and robust basis for adoption, and that an early review offers the opportunity to build on this position within the new plan making system. This ensures the Plan continues to reflect the latest national policy and most up to date evidence. The review will support the Council in proactively addressing longer term needs such as the Borough's future housing and employment requirements while monitoring delivery on allocated sites. This approach gives the Council flexibility to respond to changing circumstances and ensures the Plan remains effective and forward looking.

13. Timetable for implementation

13.1 Once adopted by full Council, the Local Plan will immediately form part of the statutory development plan for Spelthorne. In accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004, it will be used in the determination of any planning application from the following day,

notwithstanding the statutory six-week period during which the Plan may be subject to legal challenge.

14. Contact

14.1 Jane Robinson, Local Plans and Infrastructure Manager, j.robinson@spelthorne.gov.uk

Please submit any material questions to the Committee Chair and Officer Contact by two days in advance of the meeting.

Background papers:
6 June 2023 – Extraordinary Council - Request to Pause the Local Plan Examination Hearings
14 September 2023 - Extraordinary Council – Spelthorne Local Plan

Appendices:
Appendix A: DHULC S.27 Planning and Compulsory Purchase Act 2004 Local Plan Intervention Letter – 14 September 2023
Appendix B1: Planning Inspectorate - Report on the Examination of the Spelthorne Local Plan - 4 March 2026
Appendix B2: Spelthorne Local Plan – Schedule of Main Modifications
Appendix C: Spelthorne Local Plan 2024-2039/40
Appendix D: Spelthorne Local Plan 2024-2039/40 Policies Map (A4 compressed version provided for Committee report)
Appendix E: Additional (minor) Modifications
Appendix F: Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) Report
Appendix G: Habitats Regulations Assessment (HRA)
Appendix H: Equalities Impact Assessment

Department for Levelling Up,
Housing & Communities

Rachel Maclean MP
Minister of State for Housing and Planning
Fry Building
2 Marsham Street
London
SW1P 4DF

Councillor Joanne Sexton
Leader of Spelthorne Borough Council
Spelthorne Borough Council
Knowle Green
Staines-upon-Thames
TW18 1XB

14 September 2023

Dear Councillor Sexton

S.27 Planning and Compulsory Purchase Act 2004 Local Plan Intervention

In my role as Minister of State for Housing and Planning, I am writing to you over concerns that Spelthorne Borough Council ('the Council') may withdraw the emerging local plan ('the plan') from examination.

The Government is clear that local plans are at the heart of the planning system, and it is essential that up-to-date plans are in place and are kept up to date. Section 19 of the Planning and Compulsory Purchase Act 2004 ('the 2004 Act') requires that each local planning authority must identify the strategic priorities for the development and use of land in the authority's area, and policies to address those priorities must be set out in the local planning authority's development plan documents such as the local plan.

The last Spelthorne Local Plan was adopted in 2009, it should have been reviewed and updated many years ago. Withdrawing the plan at this advanced stage of preparation will extend the already unacceptable period in which the Council has had no up-to-date local plan in place.

Given the Council's proposed intention to vote on withdrawing the plan, consideration has been given to the steps that can be taken in connection with the failure to have an up-to-date plan in place, including intervention by the Secretary of State.

The Secretary of State has powers to intervene under section 27 of the 2004 Act, if he thinks that a local planning authority is failing or omitting to do anything it is necessary for them to do in connection with the preparation, revision or adoption of their local plan. It is considered that withdrawing the plan from examination would be a clear failure by the Council of the statutory test set out in section 27(1) of the 2004 Act.

I have also considered the Local Plan intervention criteria in the 2017 White Paper "Fixing our broken housing market", to assist me in determining priority and whether intervention should take place. The applicable criteria are:

- The least progress in plan-making has been made: More than 90% of English Councils have adopted a local plan since Spelthorne (February 2009). If the Council withdraws the plan, it would be left with one of the oldest adopted local plans in the country.
- Policies in plans have not been kept up to date: The adopted local plan is now over 14 years old, and it is reasonable to assume, given the age of the plan, that many of the policies it contains will not be up to date.

- There was higher housing pressure: I note in recent years that the Council has not performed well against the Housing Delivery Test and affordability in Spelthorne is worse than in three quarters of the country. I can therefore conclude that there is higher housing pressure.
- Intervention would have the greatest impact in accelerating Local Plan production: Considering the average time taken to prepare a local plan is seven years and we are approaching the phased introduction of a new planning system, withdrawing the plan at this stage could only lead to significant further delay whilst a new plan is prepared. Intervening would therefore accelerate plan production given the current plan is submitted and at examination.

Having considered Spelthorne's performance against the intervention policy criteria and the statutory test set out in section 27(1) of the 2004 Act, I am satisfied that intervention is justified.

Accordingly, the Secretary of State is exercising his powers under section 27 of the 2004 Act and directs the Council as follows:

1. **Per section 27(2)(b): Not to take any step to withdraw the plan from examination and report monthly (from the date of this letter) to my officials on the progress with the examination.** In accordance with section 27(8) of the 2004 Act, the Secretary of State's reason for making this direction is to avoid the unnecessary additional delay to having an up-to-date plan in place and additional expense that withdrawing the plan and preparing a new plan would cause.
2. **Per section 27(4)(b): On conclusion of the examination, to publish the Planning Inspector's recommendations and reasons.**
3. **Per section 27(5)(b): On conclusion of the examination, to consider adopting the plan, including any main modifications recommended by the Planning Inspector deemed necessary to make the plan sound.** In accordance with section 27(8) of the 2004 Act, the Secretary of State's reason for making this direction is to give the people of Spelthorne the best chance of having a sound local plan adopted in the near future, protecting the area in which they live from speculative development.

The above directions:

1. **Do not prevent the Council from deciding to continue progressing the plan through examination; and**
2. **Will remain in force until withdrawn by the Secretary of State.**

Should a significant delay occur to progressing the examination, and should you fail to comply with the directions in this letter, I will consider taking further intervention action to ensure that an up-to-date local plan is in place.

In the meantime, my officials will continue to engage with your officers.

Yours sincerely,

RACHEL MACLEAN MP
Minister of State for Housing and Planning

Planning Inspectorate

Report to Spelthorne Borough Council

by Jameson Bridgwater PGDip TP MRTPI

an Inspector appointed by the Secretary of State

Date 4 March 2026

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

File Ref: PINS/Z3635/429/8

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Schedule of Main Modifications ..... Appendix

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 version[1].

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** are **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.

Spelthorne Local Plan – Schedule of Main Modifications

Key:
MM – main modification
~~Strike through~~ – text to be removed
Bold – new text

Section of the Plan	Proposed modification reference	Proposed Modification
Throughout	MM01A	Amend plan period to 2024 – 2039**/40** throughout the Plan. Cover page; Chapter 2 heading; Paragraphs 2.4; 3.1; 3.9; 3.12.
All policies	MM02	Remove Sustainability Appraisal Indicators from all policies (ST1, ST2, PS1, PS2, PS3, SP1, SP2, SP3, SP4, SP5, SP6, SP7, H1, H2, H3, E1, E2, E4, E5, EC1, EC2, EC3, EC4, ID1, ID2)
Introduction	MM03	Update 1.1: The Spelthorne Local Plan, which has been prepared by the Council in consultation with the community, sets out the policies and allocations that will guide how new development and infrastructure comes forward in the Borough for the next ~~15~~ **16** years
Introduction	MM04	Remove paragraph 1.5 as follows: ~~The Staines Development Framework (SDF) is a key SPD. It demonstrates how the town can grow in a sustainable and sensitive way, delivering for our residents, while offering the necessary protection to areas. Critically the SDF is rooted in a commercial reality, essential in demonstrating that Staines can successfully accommodate the growth required for the Local Plan to be successfully delivered, while providing much needed homes for our residents, improving the infrastructure and addressing climate change.~~
	MM05	Amend paragraph 1.14 as follows: The public consultation on the final draft of the Local Plan (Regulation 19 consultation) ~~will take~~ **took** place

Section of the Plan	Proposed modification reference	Proposed Modification
		from June to September 2022. The Pre-Submission Publication Version is the version of the Plan that the Council ~~intends to~~ submit**ted** to the Planning Inspectorate for examination by an independent Inspector. ~~Any~~ **A schedule of** proposed changes to the final draft Local Plan are submitted alongside the Plan for the Planning Inspector to decide which are appropriate. ~~The Staines Development Framework as an SPD does not require submission to the Planning Inspectorate but as both documents are so intrinsically linked it is the right approach for them to be considered together.~~
	MM06	Amend paragraph 1.19 as follows: Once this has taken place, all Members of the Council will be asked to adopt the ~~p~~**P**lan ~~and the SDF~~ at a formal meeting. If adopted, the policies in the Local Plan ~~and the Staines Development Framework~~ will carry full weight and supersede former **planning** policies in older documents.
	MM07	Remove Figure 1 as follows: ~~Figure 1: Spelthorne Local Plan Process~~
2. The Route to 2037	MM08	Update figure numbers. Figure ~~2~~ **1**: Spelthorne at a Glance
	MM09	Amend paragraph 2.6 first bullet as follows: Engaging with individuals, residents' associations and other community groups so that they are better informed and have opportunity to participate in the Local Plan~~ and Staines Development Framework preparation~~.
ST2: Planning for the Borough	MM10	Amend housing requirement per annum figure throughout the Plan as follows: Policy ST2 (1) and paragraph 3.10; Policy ST2 monitoring indicators: Net number of new homes delivered per annum H1 (1) and paragraph 6.9.

<table>
<tr><th>Section of the Plan</th><th>Proposed modification reference</th><th>Proposed Modification</th></tr>
<tr><td rowspan="4">ST2: Planning for the Borough</td><td></td><td>~~618~~ 631</td></tr>
<tr><td>MM11A</td><td>Amend total and new home housing numbers in Policy ST2 1):

The housing requirement for Spelthorne is ~~618~~ 631 dwellings per annum over the plan period (2024-2039/40), a total of ~~9,270~~ ~~10,096~~ 10,726. During the plan period, provision has been made for at least ~~9,270~~ 9,900 new homes. Table 1 shows the contribution of all sources of housing supply.</td></tr>
<tr><td>MM12</td><td>Amend Policy ST2 (footnote 9) as follows:

9 As calculated using the standard method for assessing housing need at 2019 with a base date of 2024. The Council will review the local housing need figure as and when appropriate, guided by the Government’s approach to assessing housing need.</td></tr>
<tr><td>MM13A</td><td>Updated Sources of supply over the plan period as follows:

Table 1: Sources of supply over the plan period: ~~2022-2037~~ 2024 – 2039/40 (net number of homes)[10]
<table>
<tr><th>Source</th><th>Approx. number of units</th><th>Comments</th></tr>
<tr><td>Allocations</td><td>~~6,073~~ 5,672</td><td>~~829~~ 770 in Green Belt
~~5,244~~ 4,902 in Urban area 5% under-delivery discount applied</td></tr>
<tr><td>Brownfield Tier 2 sites (> 5 units)</td><td>~~1729~~ ~~1,007~~**997</td><td></td></tr>
</table></td></tr>
</table>

<table>
<tr><th>Section of the Plan</th><th>Proposed modification reference</th><th>Proposed Modification</th></tr>
<tr><td rowspan="5">ST2: Planning for the Borough</td><td></td><td>
<table>
<tr><td>Windfall: Small sites</td><td><s>570</s> 688</td><td><s>38</s> 43 per annum x <s>15</s> 16 years</td></tr>
<tr><td>Windfall: Office to residential permitted development</td><td><s>275</s> 486</td><td><s>36</s> 54 per annum in 6-10 years
<s>18</s> 36 per annum in 11-<s>15</s> 16 years</td></tr>
<tr><td>Under construction</td><td><s>792</s> 1,457</td><td>As of 31 March <s>2022</s> 2024</td></tr>
<tr><td>Extant permissions not started</td><td><s>579</s> 600</td><td>5% under-delivery discount applied</td></tr>
<tr><td>Total</td><td><s>9,439</s> 9,900</td><td></td></tr>
<tr><td>Average per annum</td><td><s>629</s> 619</td><td></td></tr>
</table>
* Yields identified in the Local Plan supersede that identified in the SLAA for allocated sites.
** Excluding sites identified for allocation in the Local Plan</td></tr>
<tr><td>MM14A</td><td>Add Table summarising housing trajectory figures (see Appendix D1 of this schedule)</td></tr>
<tr><td>MM15A</td><td>Add Figure housing trajectory graph (see Appendix D2 of this schedule)</td></tr>
<tr><td>MM16A</td><td>Amend paragraph 3.12 as follows:
Not all sites identified in the SLAA have been allocated in the Local Plan due to their non-strategic nature and the lack of benefits identified from an allocation. As such they are expected to be delivered as windfall development and are identified as ‘Brownfield Tier 2’ sites. In addition, an allowance for small sites and office to residential permitted development has been identified based on past trends. Sites under construction as of <s>March 2022</s> April 2024 are included within the supply, with a <s>15</s> 16 year period from <s>2022</s> 2024 to <s>2037</s> 2039/40.</td></tr>
</table>

<table>
<tr><th>Section of the Plan</th><th>Proposed modification reference</th><th>Proposed Modification</th></tr>
<tr><td rowspan="2">Strategy and Strategic Policies</td><td>MM17</td><td>Addition of new policy ST3: Local Plan Immediate Review policy. Full policy text forms Appendix A of this schedule.</td></tr>
<tr><td>MM17A</td><td>Amend text of policy as following:

“The Local Planning Authority will undertake a review of the Local Plan 2024-2039/40 immediately following the adoption of this Plan.”</td></tr>
<tr><td>Place Shaping, Introduction</td><td>MM18</td><td>At 4.2, amend as follows:
The Council declared a climate emergency in October 2020 and recognises that climate change is the greatest challenge currently facing us. Every decision we take must count towards reducing carbon emissions and both climate change mitigation and adaptation. Our Local Plan will help to support the transition to a low carbon future, helping to address the climate emergency, taking account of flood risk.</td></tr>
<tr><td rowspan="5">PS1: Responding to the Climate Emergency</td><td>MM19</td><td>Remove bullet point 3 (b)</td></tr>
<tr><td>MM20</td><td>Remove bullet point 5</td></tr>
<tr><td>MM21</td><td>4.10 In June 2019, the Government announced that the UK will ‘eradicate its net contribution to climate change by 2050’ by legislating for net zero emissions – the first G7 country to do so. In order to reach this target, all buildings will need to be net zero carbon by 2050. In ~~April 2021~~ October 2020 Spelthorne Borough Council declared a climate emergency and has committed to work with the local community and all other relevant partner agencies to support making the Borough carbon neutral as soon as practically possible.</td></tr>
<tr><td>MM22</td><td>4.12, in second sentence amend to:
The NPPF (2021, para ~~148~~152) sets out that the planning system should help to shape places in ways that minimise vulnerability and improve resilience and support renewable and zero carbon energy and associated infrastructure.</td></tr>
<tr><td>MM23</td><td>Add additional monitoring indicator:

<table><tr><td>Number of commercial premises built to BREEAM ‘Very good’ or better</td><td>Achieve Very good or better rating</td><td>In house monitoring</td></tr></table></td></tr>
<tr><td>MM24</td><td>Add additional monitoring indicator:</td></tr>
</table>

<table>
<tr><th>Section of the Plan</th><th>Proposed modification reference</th><th>Proposed Modification</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>Installed renewable/low carbon energy capacity (MW/h)</td><td>To increase renewable energy capacity</td><td>In house monitoring</td></tr>
</table>
</td></tr>
<tr><td>PS2: Designing Places and Spaces</td><td>MM25</td><td>Amend Policy PS2 (1) as follows:

The Council will require a high standard in the design and layout of new development. Proposals for new development should demonstrate that they ~~will~~:
• will create buildings and places that are attractive with their own distinct identity;
• will respect and make a positive contribution to the street scene and the character of the area in which they are situated; and
• will pay due regard to the scale, height, proportions, building lines, layout, materials and other characteristics of adjoining buildings and land;

• have been developed in accordance with the ~~principals~~ principles set out in the National Model Design Code and ~~adhere~~ have regard to any design policies and codes which are produced.</td></tr>
</table>

Section of the Plan	Proposed modification reference	Proposed Modification
PS2: Designing Places and Spaces	MM26	Amend PS2 (7)) by splitting paragraph and amending the wording as follows: 7) Given the size, function and proposed density of major developments, particularly those exceeding 50 dwellings, tall buildings and/or allocated sites on former Green Belt land, it may not always be desirable to reflect locally distinct patterns of development. These sites should create their own identity to ensure cohesive and vibrant neighbourhoods. High rise development in appropriate locations will be expected to be supported by a visual impact assessment and demonstrate a positive contribution to the skyline through its architectural merits. ~~In Staines, the Development Framework will provide site specific guidance on the design of larger and tall buildings.~~ [Paragraph split] 8) On a case-by-case basis, it may be appropriate for larger developments to be shaped by a design ~~panel~~ review **panel** process **proportionate to their scale and significance**, at the applicant's expense, and in conjunction with the Council.
	MM27	Add a new paragraph 4.24 to read: **Consideration of detailed design and the need for a Design Review Panel should take account of the site's context, including whether it is located in a sensitive location, the scale, height and density of the surrounding built environment and the potential for change to meet local development needs. To ensure reasonable application of PS2.8) to larger sites allocations, a site-specific requirement on design review is included where a site's anticipated yield incorporates 75+ dwellings. This requirement states that detailed design should be developed collaboratively between the applicant and the local planning authority (LPA) and encourages use of a Design Review Panel where it can positively shape development.**

Section of the Plan	Proposed modification reference	Proposed Modification
PS3: Heritage, Conservation and Landscape	MM28	Amend (1): The Council will seek to preserve~~, conserve~~ and enhance as appropriate the architectural, historic and landscape character of the Borough.
	MM29	Add paragraph to Policy PS3 as follows: **The Council will not support redevelopment proposals that would involve the loss of locally listed buildings or other structures, or unsympathetic proposals that would damage their character and setting.**
Spatial Policies, Introduction	MM30	Amend paragraph 5.2 as follows: As well as considering the urban environment, there is also an approach to the Borough's river network **and water quality issues.** This allows for opportunities to improve the local environment and biodiversity as well as ensuring that impacts on the network are avoided or mitigated.
Policy SP1: Staines-upon-Thames	MM31	Amend wording to whole Policy SP1: Staines-upon-Thames. The final version forms Appendix B to this schedule.
Policy SP4: Green Belt	MM32	Amend Policy SP4 (1) as follows: The Green Belt boundary is defined on the Policies Map. In order to uphold the fundamental aims of the Green Belt to prevent urban sprawl and to keep land within its designation permanently open, inappropriate development ~~will not~~ **should not** be approved ~~unless~~ **except in** very special circumstances ~~can be demonstrated~~. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm is clearly outweighed by other considerations.
	MM33	Amend paragraph 5.21 as follows: Proposals within the Green Belt will also be expected to comply with all other Local Plan policies **when taken as a whole**, particularly those that cover design, amenity, landscape, biodiversity and flooding.
Policy SP5: Colne Valley Regional Park	MM34	Amend Policy SP5 (1) as follows: The extent of the Colne Valley Regional Park (CVRP) within the Borough is defined on the Policies Map. As a member of the CVRP, the Council will seek to maintain the character and landscape of the Park and promote its **enhancement and** benefits.
	MM35	Amend paragraph 5.22 as follows:

Section of the Plan	Proposed modification reference	Proposed Modification
Policy SP5: Colne Valley Regional Park		The Colne Valley Regional Park covers over 10,000 hectares to the west of London. It forms a narrow corridor of countryside, much of it within the Green Belt, stretching from Rickmansworth in the north to Staines and Wraysbury in the South where the River Colne joins the Thames. It is some 14 miles long and 3 miles wide at its widest point. It straddles a number of local authority boundaries. The area within Spelthorne covers some 1,000 hectares and comprises three major reservoirs, the areas of Staines Moor, Hithermoor and the settlement of Stanwell Moor. **In addition, the River Colne SNCI and King George VI SSSI are key features and located within the Park.**
	MM36	Amend paragraph 5.23 as follows: The Colne Valley Regional Park was conceived in the 1960's with the broad aim**s** of providing for informal recreation in a countryside setting. The original objectives remain just as valid today, although they have been updated, modified and extended over the last 50 years:
Policy SP6: River Thames and its Tributaries	MM37	Amend Policy SP6 9) (d) as follows: Provide undeveloped buffer zones of 8m minimum for **main** rivers and 5m minimum for other water courses. **This is also applicable to culverted rivers**. A scheme to provide a buffer zone will need to include a working method statement detailing how the buffer zone will be protected during construction and long-term ecological plan.
	MM38	Amend paragraph 5.27 as follows: Policy SP6 aims to ensure that the setting of the river and its tributaries are protected and where possible enhanced. This involves protecting landscape features that contribute to the setting and protecting and enhancing views of the river. **Works to the main river will require a Flood Risk Activity Permit under the Environmental Permitting (England and Wales) Regulations 2016.**
	MM39	Amend paragraph 5.30 as follows: A significant area of Spelthorne lies in the floodplains of the Thames, Colne (and related river system) and Ash. Flood defences are very limited and are on parts of the River Colne system and the River Ash. The River Thames between Egham and Teddington is one of the largest area**s** of undefended, developed floodplain in England. Spelthorne Borough Council is working with the Environment Agency, **Surrey County**

Section of the Plan	Proposed modification reference	Proposed Modification
Policy SP6: River Thames and its Tributaries		**Council** and other partners to bring forward the River Thames Scheme[22] which seeks to address this with the aim of reducing flood risk in communities **by providing additional channel capacity and improved conveyance. Alongside the channels there will be large areas of green open space, new foot and cycle paths, and improved wildlife habitats. The flood channels will also provide opportunities for fishing, boating and canoeing bringing health benefits to communities as well as opportunities for tourism, recreation and leisure**. The key elements are; • a **proposed** new river channel built in two sections – at Runnymede and at Spelthorne – to increase storage capacity for water from a major flood; • improvements to existing river structures ~~and~~ **(Sunbury, Molesey and Teddington weirs);** • ~~new recreation areas for communities and habitat for wildlife;~~ • **large areas of green open space, improved wildlife habitats and opportunities for tourism, recreation and leisure; and** • **new and enhanced active travel routes for walking and cycling.**
	MM40	Amend paragraph 5.31 as follows: ~~These measures will better protect around 11,000 homes (in total not just in Spelthorne) and 1,600 businesses, enhance the natural environment around the river, and boost the local economy.~~ **Like other boroughs, Spelthorne needs to ensure it is able to plan development that responds to the climate emergency. One of the biggest risks to the Borough is flooding from the River Thames and this risk will only grow with climate change. The section of the River Thames that runs through the Borough makes up one of the largest areas of un-defended flood plain in England. The River Thames Scheme is a project designed to significantly reduce the risk of flooding by creating two new river channels totalling over 8.5 miles alongside the Thames in Runnymede and Spelthorne, as well as increasing capacity at Sunbury, Molesey and Teddington weirs. These new channels will increase the capacity of the Thames through Surrey and south west London, reducing the risk of flooding to over 11,000 homes and 1,600 businesses. Alongside the channels there will be large areas of green open space, new foot and cycle paths, and habitat creation. The flood channels will also provide**

Section of the Plan	Proposed modification reference	Proposed Modification
Policy SP6: River Thames and its Tributaries		**opportunities for fishing, boating and canoeing bringing health benefits to communities as well as opportunities for tourism, recreation and leisure.**
	MM41	Amend paragraph 5.32 as follows: The **proposed** Spelthorne channel is 3.2km in length. It starts at Laleham and ends at Weybridge. The channel flows through four lakes and crosses five roads. This area includes increasing capacity on stretch of the Desborough Cut. At Sunbury weir there will be three extra gates built on the lock island.
	MM42	Amend paragraph 5.33 as follows: The large scale of the project means it is **to be** treated as a Nationally Significant Infrastructure Project (NSIP) and requires a type of consent known as 'development consent order' (DCO). The DCO must be granted before full funding is approved and construction can begin
Policy SP7: Heathrow Airport	MM43	Amend Policy SP7 (1) (b) (first bullet) as follows: ~~seek to~~ protect and enhance designated areas of existing environmental character including Sites of Nature Conservation Importance, areas of landscape value, the Borough's historic and cultural heritage (including historic buildings and Conservation Areas), habitats particularly within Biodiversity Opportunity Areas, **Colne Valley Regional Park** and open space of amenity and recreation value;
	MM44	Amend Policy SP7 (1) (b) (second bullet) as follows: demonstrate ecological offsetting and incorporate mitigation measures to achieve **at least 10%** biodiversity net gain;

Section of the Plan	Proposed modification reference	Proposed Modification
Policy SP7: Heathrow Airport	MM45	Development Close to Heathrow and Noise from Heathrow 5) The Council will seek to minimise the adverse impact of development close to Heathrow by: (a) refusing new residential development where aircraft noise levels are at or exceed 66 **dB** L**A**eq; except in the case of the one-for-one replacement of dwellings and; (b) requiring appropriate attenuation measures for development between 60 and 65 **dB** L**A**eq.
Policy H1: Homes for All	MM46	Amend footnote 26: As calculated using the standard method for assessing housing need~~, 2021~~ **at 2019 with a base date of 2024.** The Council will review the local housing need figure as and when appropriate, guided by the Government's approach to assessing housing need
	MM47	Amend 1) The Council will make provision for at least an additional ~~618~~ **631**[26] homes per annum in Spelthorne Borough over the plan period.
	MM48	Amend H1 (7): The Council is supportive of Build to Rent housing, where a need for this type of accommodation can be demonstrated. Where Build to Rent housing is proposed, the proportion of Affordable Housing provision should be ~~in line with the benchmark level set by the Council and follow any up to date evidence, plans or strategies.~~ **as set out in national policy (20%) until such a time that the Council sets its own benchmark level supported by up-to-date evidence, plans or strategies.**
	MM49	Amend H1 (8): All new homes must be designed and constructed in a way that enables them to be adaptable, so they can meet the changing needs of their occupants over their lifetime, **including as a result of any disability.** Planning permission will be granted for new dwellings subject to the following:
	MM50	Amend H1 (8) (a):

Section of the Plan	Proposed modification reference	Proposed Modification
Policy H1: Homes for All		All new build dwellings will, as a minimum, be constructed in accordance with the requirements of Building Regulations **Approved Document M** ~~Part~~ **requirement** M4 (2) **Category 2: Accessible and adaptable dwellings** and any subsequent updates, unless it can be demonstrated that it is unfeasible to do so.
	MM51	Delete H1 (8) (b): ~~The encouragement, where practicable and viable, of dwellings on schemes involving major development being provided as wheelchair adaptable dwellings in accordance with the Building Regulations Approved Document M requirement M4(3) standard: Category 3: Wheelchair user dwellings~~. Amend H1 (8) (c), which will become H1 (8) (b): Unless it can be demonstrated that it is unfeasible to do so, the Borough Council will require a minimum of 10% of new dwellings on major housing developments to accord with ~~Category~~ **M4(3)** ~~(wheelchair adaptability)~~ **Category 3: Wheelchair user dwellings**
	MM52	Amend H1 (11): Where specialist accommodation falls within ~~use class C3~~ **a relevant use class *[footnote]** an appropriate proportion of affordable housing in accordance with Policy H2 will be required. [Footnote] ***As set out in policy H2 (g).**
	MM53	Amend H1 (14) (c): Where plots have been made available and marketed appropriately for at least 12 months and have not sold, the plot(s) ~~will be expected to remain on the open market as self-build or custom build or be offered to the Council or a Housing Association before being built out by the developer.~~ **will be returned to the developer to be built out as market housing.**
	MM54	Amend 6.9: Using the standardised methodology, Spelthorne has a need of ~~618~~ **631** new dwellings per annum. The Government makes clear that local planning authorities should be able to rely on the evidence used to justify their local housing need for a period of two years from the date they submit their Plan.
	MM55	Add new paragraph 6.16: **Affordable housing on build to rent schemes should be provided by default in the form of affordable private rent, a class of affordable housing specifically designed for build to rent. Should the Council produce a supplementary planning document on affordable housing, this should be referred to on the type of affordable housing provision required within build to rent schemes.**

Section of the Plan	Proposed modification reference	Proposed Modification
Policy H1: Homes for All	MM56	Amend paragraph 6.17: ~~6.17~~ **6.18** The intention of this approach will be to maximise the flexibility of new housing to accommodate a wider spectrum of housing needs. This will support the housing needs of older people but also those with specialist needs such as those who are disabled and wheelchair users, leading to positive impacts on health and well-being. **Wheelchair accessible provision will be expected to be provided from the time the dwelling is ready for habitation to ensure homes contain required features and standards for residents without delay or expense.**
	MM57	Amend paragraph 6.19: ~~6.19~~ **6.20:** Where the specific requirements of Building Regulations may not be achievable, an element of flexibility is recognised as being required in the delivery of these standards. This may be due to, site specific challenges around topography, flood risk and/or the relationship to design. It is acknowledged that a significant proportion of the Borough is at risk to flooding, and that this could be a constraint to achieving this. Where developers demonstrate that the M4(2) or M4(3) requirements are not feasible to be delivered on viability grounds exemptions will be on a case-by-case basis on the clear evidence submitted at planning application stage, e.g. the topography of the site makes provision as a whole not feasible and impacts development viability significantly. **Applicants will be expected to consider all other reasonable options for Accessible Home provision, for example ground floor provision or ramped access, prior to demonstrating an exemption is required.**
Policy H2: Affordable Housing	MM58	Amend H2 (1): 1) The Council will require at least 30% affordable housing units on all schemes of 10 units (net) or more. Greenfield sites will be expected to deliver at least 50% affordable housing. **The minimum amount of affordable housing to be delivered should be calculated based on the net total amount of provided dwellings.**
	MM59	Amend H2 d): ~~Proposals for housing need to meet the need as identified in the most up to date housing needs assessment with particular regard to size, type and tenure of dwellings.~~ **The tenure split should be informed by the most up to date Council evidence**. The tenure and number of bedrooms of the affordable homes provided on each qualifying site must contribute towards meeting the mix of affordable housing needs identified in the Strategic

<table>
<tr><th>Section of the Plan</th><th>Proposed modification reference</th><th>Proposed Modification</th></tr>
<tr><td rowspan="5">Policy H2: Affordable Housing</td><td></td><td>Housing Market Assessmen[t31]. This currently includes a tenure split of 75% affordable/social rent, with 25% First Homes as per national guidance[32] . A minimum of 10% of the homes provided on each site must be available for affordable home ownership, except where an exemption applies in the NPPF.</td></tr>
<tr><td>MM60</td><td>Amend Footnote 29:
or subsequent affordable housing needs evidence (as previous) commissions or produced by the council. Where available, wider sources relating to affordable housing need may also be considered to understand needs more local to a development proposal.</td></tr>
<tr><td>MM61</td><td>Amend H2 (e):
Where Build to Rent housing is proposed, the proportion of Affordable Housing provision should be ~~in line with the benchmark level set by the Council and follow~~ as set out in the national policy (20%) until such a time that the Council sets its own benchmark level supported by any up-to-date evidence, plans or strategies.</td></tr>
<tr><td>MM62</td><td>Amend H2 (g):
The requirement to provide affordable housing will apply to all residential development falling under ~~Use Class C3~~ Use Class C2, C3 and C4, or any subsequent amendments to the Use Classes Order, with the exception of Gypsy & Traveller Pitches or Travelling Showman Plots.</td></tr>
<tr><td>MM63</td><td>Add additional monitoring indicator:
<table><tr><td>Number of people on the Council Housing Register</td><td>To ensure development schemes are addressing current affordable housing needs.</td><td>Council Housing Register</td></tr></table></td></tr>
<tr><td>Policy H3: Meeting the Needs of Gypsy, Traveller</td><td>MM64</td><td>Add additional paragraph to Policy H3 as follows:

5) Caravans, mobile homes and park homes intended for permanent residential use are considered highly vulnerable under the planning practice guidance and therefore not allowed in Flood Zone 3 and only allowed in Flood Zone 2 if the Exception Test is passed.</td></tr>
</table>

Section of the Plan	Proposed modification reference	Proposed Modification
and Travelling Showpeople		
Policy E1: Green and Blue Infrastructure	MM65	Amend para 7.2 Recognising the importance of both protecting the existing natural environment and delivering high quality development which provides further enhancements, the policies within the Plan set out how this will be achieved over the next ~~15~~ **16** years.
	MM66	Amend Policy E1 (1) as follows: ~~D~~ **All d**evelopment must contribute towards the provision, protection and enhancement of the wider green **and blue infrastructure** network at a scale commensurate with the proposal.
	MM67	Amend Policy E1 (3) as follows: Where development is located on or adjacent to a watercourse or reservoir proposals must contribute towards the delivery of a high quality multi-functional blue infrastructure network through ensuring the protection and enhancement of the ecological, **flood risk management,** landscape and recreational value of that water body.
	MM68	Amend paragraph 7.7 as follows: Blue Infrastructure is the network of watercourses and other bodies of water including reservoirs, which provide ecological, **flood risk management,** landscape and recreational value to the Borough. This also includes the banks and corridors immediately along the watercourse which can provide significant biodiversity benefits and play a vital role in ensuring habitat connectivity.
	MM69	Amend paragraph 7.9 in the Reasoned Justification as follows: All development should contribute towards the provision, improvement, and maintenance of the green infrastructure network across the Borough where appropriate to do so. Whilst the Council will only expect 'major' development proposals to be designed in accordance with established, recognised green infrastructure standards, all developments can make a positive impact on the green infrastructure network and proposals will, be expected to make such provision at a scale that is commensurate with the development.

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Policy E1: Green and Blue Infrastructure		~~Supplementary guidance will set out how development proposals on a large and small scale might assist in enhancing the green infrastructure network~~
	MM70	Add a new paragraph after paragraph 7.9 in the Reasoned Justification (to be 7.10 and the rest of the paragraphs subsequently renumbered) as follows: **Simple measures and features can be incorporated into householder and minor developments that can contribute to or enhance the green infrastructure network. Cumulatively, small-scale sites already play an important role in providing and connecting the existing green infrastructure network and applicants are encouraged to consider enhancing existing green infrastructure within their development and to avoid or mitigate loss wherever possible.**
	MM71	Amend the first bullet point in the Key Evidence as follows: Key Evidence • Biodiversity Opportunity Areas: the basis for realising Surrey's ecological network (Surrey Nature Partnership, ~~2015~~ **2019**) (available online at: Biodiversity Opportunity Areas: the Basis for Realising Surrey's Ecological Network - DocsLib) Replace source link with the following link: https://surreynaturepartnership.org/wp-content/uploads/2019/10/boas_the-basis-for-realising-surreye28099s-ecological-network_synp_sept_2019.pdf
Policy E2: Biodiversity	MM72	Amend Policy E2 (3) as follows: The Council will maintain Sites of Nature Conservation Importance as shown on the Policies Map and will only permit development proposals within these sites, where there will be no adverse effect, either directly or indirectly on their ecological interest and this has been clearly demonstrated through use of appropriate assessment. **Development proposals will be supported which clearly demonstrate enhancement to the value of SNCIs and where an agreed management plan is set out which shows how the enhancements will be secured for the long term.**
	MM73	Amend Policy E2 (5) as follows:

Section of the Plan	Proposed modification reference	Proposed Modification
Policy E2: Biodiversity		The Council will seek net gains in biodiversity through creation or expansion, restoration/enhancement of habitats and features to improve the status of priority habitats and species. All development will be expected to provide at least 10% net gain, using the most up-to date Biodiversity metric, **appropriate to scale of development.**
	MM74	Amend Policy E2 (6) as follows: The Council will expect developers to demonstrate full consideration of a variety of means in improving biodiversity within developments including, but not limited to, the use of innovative approaches where appropriate such as: • the installation of bee bricks, • use of bird nest **and bat roost boxes or gabions** • incorporation of green roofs and living walls • ***minimise external lighting***
	MM75	Amend Policy E2 (7) as follows: Development proposals should demonstrate clearly how biodiversity net gain will be achieved and this should be in **accordance with the Surrey Local Nature Recovery Strategy (to be prepared) and take account of other national, regional and local biodiversity strategies** including any Supplementary Planning Document and/or additional guidance as produced by the Council.
	MM76	~~Amend MM 68 (which amended Policy E2 (8)) to amend wording as follows:~~ Amend Policy E2 (8) as follows: 8) Biodiversity net gain should be delivered using the **BNG mitigation hierarchy of avoid losses, mitigate and lastly compensate. Where off site compensation is required, this should** ~~be~~ **maximise opportunities within the Borough boundary and should be as close to the development site as possible** ~~following hierarchy:~~ **BNG delivery should be:** i) On site as part of the development; ii) Where on-site delivery is not feasible, ~~then this~~ **it** should be provided on land adjacent to, or as close to the development site, as possible;

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Policy E2: Biodiversity		iii) ~~As a last resort, net gain~~ **Off-site delivery** should, **where feasible and practical, be** ~~secured~~ on land within the Borough boundary.
	MM77	Amend Policy E2 (10) as follows: Development proposals not directly related to the management of Ramsar, and SPA, as well as SSSI units forming part of these designations will not be permitted unless it can be demonstrated that the impact of proposals, either alone or in combination, will not result in likely significant effects. ~~If significant adverse effects remain even with the implementation of suitable avoidance and/or mitigation, development proposals will need to demonstrate that alternatives to the proposal have been fully explored.~~
	MM78	Amend paragraph 7.24 as follows: Development proposals should refer to any relevant Supplementary Planning Documents or Action Plans that are produced by the Council which guide on biodiversity net gain for planning applications. **Additionally, nature recovery networks are to be proposed in the Local Nature Recovery Strategy for Surrey, which is currently being prepared. Once complete, development will have to take account of the LNRS when delivering biodiversity net gain and other measures/mitigation.**
	MM79	Amend paragraph 7.25 as follows: BOAs are key areas where priority habitat can be created, improved or restored and there are two significant areas identified in Spelthorne where opportunities for restoration and creation of habitats exist: • Staines Moor to Shortwood Common (TV03) • Shepperton to Thorpe (TV04) • **River Thames (TV06)**
	MM80	Amend the first bullet point in the Key Evidence as follows: Key Evidence • Biodiversity Opportunity Areas: the basis for realising Surrey's ecological network (Surrey Nature Partnership, ~~2015~~ **2019**) (available online at: Biodiversity Opportunity Areas: the Basis for Realising Surrey's Ecological Network - DocsLib)

Section of the Plan	Proposed modification reference	Proposed Modification
		Replace source link with the following link: https://surreynaturepartnership.org/wp-content/uploads/2019/10/boas_the-basis-for-realising-surreye28099s-ecological-network_synp_sept_2019.pdf
Policy E3: Managing Flood Risk	MM81	Amend wording to whole Policy E3. The final version is set out in the Addendum to the EA and SBC SoCG dated 12 Feb 2025 and forms Appendix C of this schedule.
	MM82	Amend 4 (f) as follows: 4) (f) applications include appropriate flood warning and evacuation **plans** and site drainage systems take account of storm events and flood risk of up to 1% annual probability or 1 in 100 year event with an appropriate allowance for climate change.
	MM83	Amend Footnote 9 in Policy E3, at Appendix C, as follows: [9] www.gov.uk/government/publications/personal-flood-plan **and www.adeptnet.org.uk/floodriskemergencyplan**
	MM84	Amend Footnote 10 in E3 from Appendix C as follows: See NPPF (2021) footnote 5~~9~~**5 or NPPF (2024) footnote 63**
	MM85	Monitoring Indicators: **Indicator** Number of planning decisions, including appeals, granting permission not in accordance with ~~Policy E2~~ **advice from the Environment Agency or Surrey CC** **Target** No planning permissions that are not in accordance with ~~Policy E2~~ **advice from the Environment Agency or Surrey CC**
Policy E4: Environmental Protection	MM86	Amend Policy E4 (1) as follows: The Council will seek to protect and improve the Borough's air quality ~~and work towards meeting the World Health Organisation Air Quality Guidelines~~ by ensuring all development ~~proposals prevent further deterioration~~

Section of the Plan	Proposed modification reference	Proposed Modification
Policy E4: Environmental Protection		~~of existing poor air quality and are "air quality neutral" as far as reasonably practicable~~ **complies with national policy*[footnote] and guidance and the most up-to-date Air Quality Action Plan** *[Footnote] **in line with NPPF, paragraph 199.**
	MM87	Amend Policy E4 (5) as follows: The Council will ensure all development located near ground and surface water have the appropriate measures in place to mitigate any adverse impact on water quality and water features. **Development should not have any adverse impact on groundwater flow or quantity, nor should there be any adverse impact on groundwater quality.** Planning permission will not be granted for developments which do not demonstrate the incorporation of water efficiency measures such as water recycling and collection features. Wherever practical, Sustainable Urban Drainage Systems (SuDS) should be incorporated to minimise the discharge of surface water to the sewer system.
	MM88	Amend Policy E4 to create new sub-section on 'Odour' as follows: **Odour** **6) New development should not be located in areas where future occupiers may be affected by existing sources of odour unless it is demonstrated that there would be no adverse impact on the amenity of future occupiers or that any necessary mitigation measures have been identified and secured.**
	MM89	Noise 6) The Council will seek to protect and improve local noise conditions as far as reasonably practicable. The Council will ensure that development proposals that may generate unacceptable noise or be unreasonably impacted by noise sources incorporate appropriate attenuation measures to minimise the effects on new and existing residents. The adverse impacts of noise are to be reduced to acceptable levels through good design, layout and orientation of sites and buildings, and adequate noise insulation. In residential areas close to the airport, only one-for-one replacement of existing housing will be allowed within the 66 **dB** L**A**eq and above noise contour. The Council will require an acoustic report to accompany an application for development proposals that may be sensitive to noise sources, or might cause unacceptable noise for residents, businesses

Section of the Plan	Proposed modification reference	Proposed Modification
Policy E4: Environmental Protection		or the environment. Planning permission will be refused where the impact of noise cannot be mitigated to an acceptable level.
	MM90	Amend Policy E4 (7) as follows: Light ~~7)~~ **8)** ~~This policy seeks to minimise the adverse impact from light pollution on the environment. It promotes the use of measures to minimise the adverse impact of lighting on surrounding areas.~~ Applicants developing proposals for lighting will be required to assess the impact of the lighting scheme and demonstrate there are no unacceptable adverse impacts. **In designing new developments, consideration should be given to ensuring that the new occupiers are not adversely affected by existing sources of light pollution.** The Council will require developments that may result in light pollution to incorporate appropriate design and energy saving measures in order to minimise the potential for light pollution. Planning permission will not be granted for light generating development proposals that may have an adverse impact on residential developments, amenity, wildlife, biodiversity and highway safety. The Council will require a lighting impact assessment to accompany an application for development proposals that may cause unacceptable light pollution for residents, businesses or the environment.
	MM91	Amend Policy E4 (8) as follows: ~~8)~~ **9)**The Council will ensure that where development is proposed on land that may be affected by contamination, the applicant must undertake appropriate risk assessment and if necessary, remediation to ensure the development is safe or will be made safe for its intended use and **should be carried out by a competent person.** Through the incorporation of mitigation measures, treatment to reduce contamination or remove pollutant pathways and soil/ground gas/groundwater remediation initiatives, receptors exposure to land contamination will be minimised.
	MM92	Amend Policy E4 (9) (ii) as follows: 10) ii) Impose conditions on planning permissions requiring appropriate investigation and remediation of contamination before development can proceed. **This will also include conditions at sites affected by land contamination to ensure verification of remediation is completed to a sufficient standard.**

Section of the Plan	Proposed modification reference	Proposed Modification
Policy E4: Environmental Protection	MM93	Add new paragraph 7.37 as follows: **Competent person: Able to undertake a risk assessment and any subsequent remediation strategy as set out within the NPPF para 183 (C)**
	MM94	Amend footnote 57 in Policy E4 as follows: ~~DLUHC~~ **MHCLG** (2014). Land affected by contamination guidance. Available from: www.gov.uk/guidance/land-affected-by-contamination
	MM95	Amend paragraph 7.41 as follows: ~~7.41~~ **7.42** Air Quality is an important environmental issue for Spelthorne **and the Council is working towards meeting the World Health Organisation Air Quality Guidelines**. The Council's Air Quality Action Plan designates the whole Borough as an Air Quality Management Area (AQMA). This reflects that the whole Borough has a particular need to improve air quality therefore the Council will ensure that any new development in the Borough is consistent with the local Air Quality Action Plan and the requirements of national policy for planning decisions to sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the AQMA and cumulative impacts (NPPF 2021, paragraph 186).
	MM96	7.54 Noise pollution from Heathrow Airport is of particular concern to the Council as the airport is close to major built up areas which means a large number of people in the Borough suffer noise disturbance from aircraft using the airport. Approximately, 300,000 people are affected by aircraft noise from Heathrow as defined by the 57 **dB** L**A**eq noise contour. In Spelthorne the worst affected areas are in the north of the Borough in Stanwell and Stanwell Moor.
	MM97	Change reference within monitoring indicators from 66Leq to 66 **dB** L**A**eq.
Policy E5: Open Space and Recreation	MM98	Amend sub heading as follows: Existing ~~O~~**o**pen ~~S~~**s**pace, **sport and recreation facilities**
	MM99	Amend Policy E5 (1) as follows:

Section of the Plan	Proposed modification reference	Proposed Modification
Policy E5: Open Space and Recreation		The Council will seek to protect, maintain and enhance existing open spaces, **sports facilities** and areas for recreation and encourage quality and accessibility improvements. Priority will be given to areas where specific deficiencies in access or quality have been identified.
	MM100	Amend Policy E5. 2. a, b and c as follows: ~~2)The Council will not permit the loss or displacement of existing open space to other uses unless it can be demonstrated, through up-to-date and robust evidence, that:~~ ~~(a)There is a proven surplus of provision and the site is no longer needed, or is unlikely to be required in the future; or~~ ~~(b)The benefit of the development to the community outweighs the harm caused by the loss of the facility; or~~ ~~(c)An alternative facility of an equal quantity and quality or higher standard will be provided in at least an equally convenient and accessible location to serve the same local community.~~ 2. **Applications for development that would result in the loss, displacement or change of use of existing open space, sports and recreational buildings and land, including playing fields, will be determined in accordance with national policy[24].** Add footnote to read [24] **NPPF (2024), paragraph 104**
Policy EC1: Meeting Employment Needs	MM101	Amend Policy EC1 paragraph 8.4 as follows: ~~The study was published prior to~~ The COVID-19 pandemic ~~which~~ has resulted in a change in the working patterns of many people and the extent to which these changes ~~might~~ become permanent is not yet clear. Some employers are likely to make more flexible or hybrid working practices permanent with smaller office spaces needed. Some occupiers are likely to be reviewing their space needs particularly in light of the financial difficulties and uncertainties businesses face around COVID-19 and BREXIT. Whilst it is too soon to quantify the impact on future need, this highlights the need for flexibility to enable businesses to adapt to meeting changing market conditions and achieve innovations. For this reason, it has been decided flexibility and frequent review is required with the floorspace needs.
	MM102	Amend Policy EC1 (1) as follows: Economic growth in Spelthorne will be supported by maintaining and intensifying the use of the Borough's employment floorspace offer. This will be done by;

Section of the Plan	Proposed modification reference	Proposed Modification
Policy EC1: Meeting Employment Needs		• safeguarding employment land, • provision of new ~~land~~ **floorspace** in line with needs identified through the most up to date evidence and • encouraging its innovative re-use in ways that better meet the needs of the market **whist remaining within employment use**.
	MM103	Amend Policy EC1 (4) as follows: 4. The five designated employment areas (as shown on the Policies Map that together make up the Borough's current core supply of employment land) will be protected as Strategic Employment Areas and changes of use of land and/or buildings from employment to non-employment use will be resisted. The refurbishment and redevelopment of sites in these areas for employment use and proposals for the intensification of sites for employment use will be permitted. • Bedfont Road, Stanwell • BP, Chertsey Road, Sunbury • Hanworth Road • Shepperton Studios **(is the preferred location for new film and television studio related-use)**[25] • Windmill Road, Sunbury [25] **Shepperton Studios is not a preferred location for new office and R&D floorspace.**
	MM104	Amend EC1.9. as follows: Redevelopment or change of use to a non-employment use will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use for a continuous period of at least 24 months prior to submission of a planning application. If the site is allocated for an alternative use within the Local Plan, ~~the~~ **evidence of** marketing ~~period~~ will not be required
	MM105	Amend Policy EC1 (Monitoring Indicators, under Target) as follows: E (g) (i and ii): **18,372 sqm** B8 (general): **12,005 sqm** B2: **-11,268 sqm**
Policy EC2: Retail	MM106	Amend Policy EC2 (Key Evidence) as follows: • National Planning Policy Framework (NPPF) 2021

Section of the Plan	Proposed modification reference	Proposed Modification
Policy EC2: Retail		• **Planning Practice Guidance Town Centres and Retail** • Retail and Town Centre Study 2015 • Retail and Town Centre Study Update 2018 • Annual retail survey
Policy EC4: Leisure and Culture	MM107	Amend Policy EC4 (3) as follows: **3 (c) Applications for development that would result in the loss, displacement or change of use of major indoor sporting facilities will be determined in accordance with the latest national policy[26].** **[26] NPPF (2024) including paragraphs 98 and 104**
Policy ID1: Infrastructure and Delivery	MM108	Amend 9.1 as follows: The Council is required to identify the infrastructure needed to support the development proposed over the next ~~15~~ **16** years.
	MM109	Amend Policy ID1 paragraph 9.9 as follows: The planning system allows the Council to ensure that there is adequate infrastructure in place to support new development. ~~Developers, where required, will have to demonstrate that their proposed developments incorporate adequate wastewater capacity and surface water drainage both on and off site. Where there is an infrastructure capacity constraint, the Council will require the developer to clearly set out the appropriate improvements required to facilitate the development and how this will be delivered. The planning system has mechanisms to secure timely provision such as through the imposition of Grampian-style conditions which relate to restricting development to phases.~~ **Developers, where required, will have to demonstrate that wastewater and water network capacity will be in place ahead of the occupation of development. Developers are encouraged to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Local network upgrades can take 18 months to 3 years to plan and deliver with strategic upgrades taking 3-5 years. Where there is an infrastructure capacity constraint, the Council will where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.**

Section of the Plan	Proposed modification reference	Proposed Modification
Policy ID1: Infrastructure and Delivery	MM110	Remove reference to Part 2 of the IDP from Key Evidence: • Infrastructure Delivery Plan ~~(including Part 2)~~
Policy ID2: Sustainable Transport for New Developments	MM111	Amend Policy ID2 1(a) ,1(d), 1(e) as follows: a) Provision of, or contributions towards, the improvement of public and community transport **where identified as required** d) providing improvements to or contributions towards improving the capacity and security of cycle parking at the Borough's public transport stations **where identified as required** e) providing funding to deliver the transport projects and highways improvements necessary to support the spatial strategy as set out in the Infrastructure Delivery Plan ~~(forthcoming)~~ **where identified as required**
	MM112	Amend Policy ID2 1(b) to include a footnote as follows: 1)(b) provision of vehicle parking standards, as set out in the Council's latest Parking SPD **[footnote]**, and the provision of electric vehicle charging points which are set out in the latest Surrey County Council guidance; **[footnote] A reduction of parking requirements may be appropriate in specific situations, in locations with good access to public transport and local services. Any proposed reduction will be assessed against criteria including:** **a. Distance from public transport node i.e. main railway station, bus station, main bus stop;** **b. Frequency and quality of train service;** **c. Frequency and quality of bus service;** **d. Availability and quality of pedestrian and cycle routes;** **e. In line with Surrey County Council Car Club Guidance, car clubs will be encouraged for developments of 50 or more residential units.**
	MM113	Amend Policy ID2 1(d), 1(f), 2(c), definitions as follows:

Section of the Plan	Proposed modification reference	Proposed Modification
Policy ID2: Sustainable Transport for New Developments		Public Transport ~~Interchange~~ **Stations**
	MM114	Amend Policy ID2 1(e) as follows: Providing funding to deliver the transport projects and highways improvements required to support the spatial strategy as set out in the Infrastructure Delivery Plan ~~(forthcoming);~~
	MM115	Amend Policy ID2 1(f) as follows: f) providing a transport assessment and travel plan for all ~~major~~ development proposals **likely to generate significant amounts of transport movement** to promote the delivery and use of sustainable transport. The Travel Plan should set out how it will facilitate the use of sustainable and active transport modes, including but not limited to; low emission car clubs, low emission employee shuttle bus schemes supporting public bus schemes or offering discounted season tickets between public transport interchanges and employment areas
	MM116	Amend paragraph 9.15 as follows: The Council will work with stakeholders and Surrey County Council as part of the forthcoming Infrastructure Delivery Plan, which will set out the key infrastructure required to support the delivery of the Local Plan, including sustainable transport and highway schemes. Growth over the Plan period will give rise to increased traffic volumes and it is therefore required that this be mitigated as far as possible. The policy sets out the measures by which the Council will seek to militate against the impacts and will require new developments to adopt the relevant standards to achieve this. **Surrey County Council's 2022 Local Transport Plan 4 sets out county-wide policies on reducing transport emissions in order to help meet the county's commitment to becoming net zero by 2050. One of the primary delivery mechanisms for achieving net zero is the roll out of Local Cycling and Walking Infrastructure Plans (LCWIP). The Spelthorne LCWIP will provide a 10-year plan for the delivery of walking and cycling infrastructure within Spelthorne and seeks to deliver safe, high-quality walking and cycling environments across the Borough.**
	MM117	Amend Policy ID2 paragraph 9.17 as follows: ~~All major developments require the submission of a Transport Assessment and Travel Plan.~~ **All developments likely to generate significant amounts of transport movement are required to submit a Transport Assessment and Travel Plan.** These documents set out the potential transport impacts of the proposals, how these will be addressed and how sustainable travel will be delivered in the long term. There

Section of the Plan	Proposed modification reference	Proposed Modification
Policy ID2: Sustainable Transport for New Developments		may be occasions where smaller developments have lower impacts and therefore a Transport Statement may be necessary unless it can be demonstrated to the satisfaction of the Council that the changes are minor. Such assessments will be subject to liaison between the Council and the highway authority or authorities.
	MM118	Amend Policy ID2 (Key Evidence) as follows: Key evidence • Spelthorne Borough Council Local Plan Strategic Highway Assessment Report (Surrey County Council, 2019) • Strategic Highways Assessment Report (Surrey County Council, 2022) • Spelthorne Local List of Information Requirements (2015) • ~~Vehicular and Cycle Parking Guidance (Surrey CC, 2018)~~ • **Vehicle, Cycle and Electric Vehicle Parking Guidance for New Development (SCC, 2022)**
Allocations	MM119A	Remove site-specific wording: ~~• Include measures to mitigate the impact of development on the local road network and take account of impacts on the strategic road network as identified through a site-specific Travel Plan and Transport Assessment.~~ and add Footnote: **Refer to Policy ID2 in regard to sustainable transport for new developments** to sites: AE3/006, AS1/001, AS1/003, ~~**AS1/011,**~~ 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
Allocations	MM120	Add a final bullet point in Site-specific requirements to sites: 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 as follows: **Applicants are encouraged to develop the detailed design of the site in collaboration with the LPA. Use of a Design Review Panel will be encouraged where it is considered that it can positively shape development.**

Section of the Plan	Proposed modification reference	Proposed Modification
	MM121	Add **The site will not be available for development until a safe route for access and egress can be provided and maintained during a flood event (i.e. the 1% AEP fluvial flood event and surface water event including an appropriate climate change allowance)** to site-specific requirements for Site Allocations ST4/004, ST4/019, ST4/023, ST4/024, ST4/025 , ST4/026, ST4/028, SH1/015, SH1/010, SH2/003, ST1/028.
Allocations Years 1-5	MM122A	Amend timeframe dates ~~2023-2027~~ **2024-2028** for ~~**AS1/011**~~, 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, ST3/004
	MM123	Add **In order to ensure that future development does not increase the risk of flooding to the surrounding areas, the built footprint of the new development should not exceed that of the existing building and where possible should be reduced. The site layout will be required to be designed to ensure development is set back from the River Ash** to Site-specific requirements for AT1/012.
	MM124	Add **Within the area which falls within flood zone 3a (1% AEP), the built footprint of the new development should not exceed that of the existing building and where possible should be reduced. The site layout will be required to be designed to ensure all development is able to access the safe route for access and egress (shown within the SFRA Level 2) during a flood event (i.e. the 1% AEP fluvial flood event and surface water event including an appropriate climate change allowance)** to Site-specific requirements for ST1/037.
	MM125	Amend HS1/012: Proposed allocation: Residential C3: ~~60 units~~ **70 units** (approx.)
Allocations Years 1-5	MM126	Remove from HS1/012: • ~~Surrey County Council as the education provider support additional sixth form development, subject to the supply of specific types of provision. This is to be agreed with the Council as part of the application process~~

Section of the Plan	Proposed modification reference	Proposed Modification
	MM127	Move Site HS1/012b (Land East of Upper Halliford Road) from Years 6-10 to Years 1-5 and amend: Delivery Timeframe ~~2028-2032 (years 6-10)~~ **2024-2028 (years 1-5)**
	MM128	Amend HS1/012b site specific requirement: ~~The~~ Provision ~~of a~~ **for** new sixth form college **facilities** supported by the provision of approximately 20 houses to enable the education **provision** ~~development.~~
	MM129	Move Site AS1/003 (Former Staines Fire Station, Town Lane) from Years 6-10 to Years 1-5 and amend: Delivery Timeframe ~~2028-2032 (years 6-10)~~ **2024-2028 (years 1-5)**
	MM130	Move Site SC1/019 (Sunbury Social Services Centre, Vicarage Road) from Years 11-15 to Years 1-5 and amend: Delivery Timeframe ~~2033-2037 (years 11-15)~~ **2024-2028 (years 1-5)**
	MM131	Move Site SE1/020 (Sunbury Adult Education Centre, The Avenue) from Years 6-10 to Years 1-5 and amend: Delivery Timeframe ~~2033-2037 (years 11-15)~~ **2024-2028 (years 1-5)**
	MM132	Move Site SE1/025 (Elmbrook House, Station Road) from Years 6-10 to Years 1-5 and amend: Delivery Timeframe ~~2033-2037 (years 11-15)~~ **2024-2028 (years 1-5)**
	MM133	Remove Site ST4/002 (Bridge Street Car Park, Hanover House & Sea Cadet Building, Bridge Steet, Staines)
	MM152A	**Delete allocation policy AS1/011 (Land at Former Bulldog Nurseries, Town Lane).**
Allocations Years 6-10	MM134	Amend timeframe dates ~~2028-2032~~ **2029-2033** for AE3/006, AS1/001, RL1/011, SC1/006, ST3/014, ST4/004, ST4/023, ST4/024
	MM135	Remove Site ST1/029 (Surrey County Council Buildings, Burges Way, Staines)
	MM136	Remove Site ST1/030 (Fairways Day Centre, Knowle Green, Staines)
	MM137	Remove Site ST4/010 (Riverside Car Park, Thames Street, Staines)
	MM138	Remove Site ST4/011 (Thames Lodge Hotel, Thames Street, Staines)
	MM139	Move Site ST4/019 (Former Debenhams Site, High Street) from Years 1-5 to Years 6-10 and amend: Delivery Timeframe

Section of the Plan	Proposed modification reference	Proposed Modification
Allocations Years 6-10		~~2023-2037 (years 1-5)~~ **2029-2033 (years 6-10)**
	MM140	Move Site AS2/001 (Ashford Youth Club, Kenilworth Road) from Years 11-15 to Years 6-10 and amend: Delivery Timeframe ~~2033-2037 (years 11-15)~~ **2029-2033 (years 6-10)**
	MM141	Move Site AT3/016 (23-31 (not 11-19) Woodthorpe Road) from Years 1-5 to Years 6-10 and amend: Delivery Timeframe ~~2023-2027 (years 11-15)~~ **2029-2033 (years 6-10)**
	MM142	For proposed policy wording for Site Allocation SC1/021 (see Appendix E1)
	MM143	For proposed policy wording for Site Allocation SN1/012 (see Appendix E2)
	MM144	Add **In order to ensure that future development does not increase the risk of flooding to the surrounding areas, the built footprint of the new development should not exceed that of the existing building and where possible should be reduced. The site layout will be required to be designed to ensure all development is able to access the safe route for access and egress (shown within the SFRA Level 2) during a flood event (i.e. the 1% AEP fluvial flood event and surface water event including an appropriate climate change allowance).** to Site-specific requirements for ST4/009
Allocations Years 11-16	MM145A	Update Title: ~~Years 11-15 (2033-2037)~~ **Years 11-16 (2034-2039/40)**
	MM146A	Amend timeframe dates ~~2033-2037 (years 11-15)~~ **2034-2039/40 (years 11-16**) for AT3/009, SC1/013, SE1/003, SE1/008, SH1/015, SH2/003, SN1/005, ST1/031, ST2/006, ST3/012, ST4/009.
	MM147	Move Site SH1/010 (Shepperton Library, High Street) from Years 6-10 to Years 11-15 and amend Delivery Timeframe ~~2028-2032 (years 6-10)~~ **2034-2039 (years 11-16)**
	MM148	Move Site ST1/028 (Leacroft Centre, Leacroft, Staines) from Years 6-10 to Years 11-15 and amend Delivery Timeframe ~~2028-2032 (years 6-10)~~ **2034-2039 (years 11-16)**
	MM149	Move Site ST4/026 (Communications House, South Street, Staines) from Years 1-5 to Years 11-15 and amend Delivery Timeframe ~~2023-2037 (years 1-5)~~ **2034-2039 (years 11-16)**

Section of the Plan	Proposed modification reference	Proposed Modification
Allocations Years 11-16	MM150	Move Site ST4/028 (William Hill/ Vodafone/Monsoon, High Street) from Years 1-5 to Years 11-15 and amend Delivery Timeframe ~~2023-2037 (years 1-5)~~ **2034-2039 (years 11-16)**
New section: 11. Monitoring	MM151	Insertion of a table of all the monitoring indicators within the Plan and the corresponding policy reference. This will include the Indicator(s), Target(s) and Data source(s). Removal of these monitoring indicator tables from the end of each of the policies.

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Spelthorne Borough Council

Spelthorne Local Plan

2024 – 2039/40

March 2026

SPELTHORNE
BOROUGH COUNCIL

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1. Introduction

What is a Local Plan?

1.1 The Spelthorne Local Plan, which has been prepared by the Council in consultation with the community, sets out the policies and allocations that will guide how new development and infrastructure comes forward in the Borough for the next 16 years. The Local Plan supports the sustainable growth of Spelthorne in a planned way, which benefits our communities, environment and economy.

1.2 The Local Plan is a statutory document that forms part of the Council's strategy to deliver sustainable development, tackle climate change and deliver new homes, jobs and infrastructure for current and future Spelthorne residents. The Local Plan sits within a wider framework of planning documents, including national guidance set out by the government in the National Planning Policy Framework (NPPF), regional and county planning policies and guidance, strategic plans, supporting strategies and background studies. The Local Plan will form the basis on which planning applications will be determined in Spelthorne.

1.3 The Local Plan comprises various parts to be read as a whole. Our destination and objectives set out what the Spelthorne Local Plan is aiming to achieve and the policies and land designations to support their delivery. The policies are split into the high-level strategic policies and allocations, which set out the overall strategy and overarching principles for the Local Plan. The plan also includes the detailed policies which set out the design and technical criteria against which proposed development will be assessed.

1.4 To support the Local Plan the Council can prepare additional guidance, which sets out how a policy is to be implemented in greater detail. These documents are called Supplementary Planning Documents (SPDs). The Council will prepare and update SPDs, where required to support the successful delivery of the Local Plan.

Why is it important we have a Local Plan?

1.5 All Local Planning Authorities (LPAs) are required by the Government, to provide a long-term plan setting out how we will meet our future needs. In Spelthorne, as in much of Surrey and the South East, successfully and sustainably accommodating this growth and new development presents a real challenge. This challenge is all the greater in Spelthorne as a result of our extensive Green Belt, much of which comprises waterbodies and the amount of the Borough at risk of flooding, which limits our supply of land suitable and available for the level of development required to meet our housing need. An up to date, evidence based Local Plan allows us as a Borough to take a proactive approach to planning for and manging growth in a way that most benefits our present and future residents, while protecting what is most important.

1.6 If we do not have a Local Plan development will still take place, however we will not be able to use our own policies to determine the type and location of development, which may result in increased risk to, for example, our strategically important Green Belt, attractive open spaces and heritage assets. We will also be less able to require the improvements to our infrastructure, such as highways and green and blue infrastructure, which are essential to support additional development and deliver a wide range of benefits for our residents.

How are Local Plans prepared?

1.7 Local plans must be positively prepared, justified, effective and consistent with national policy, in accordance with section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the NPPF.

1.8 In preparing the Local Plan there are a several stages which must be undertaken. The process involves the gathering and analysis of the evidence necessary to support decision making, extensive consultation with a broad range of stakeholders including our residents, businesses, neighbouring authorities and other public sector partners, statutory bodies and the development industry.

Issues and Options Consultation 2018

1.9 The first consultation on the emerging Local Plan (Regulation 18 consultation) took place in May and June 2018. The Council consulted on the Spelthorne Issues and Options Consultation Pape, which set out the key issues affecting Spelthorne and the options considered for how we could meet our needs. The paper identified the challenges and constraints for development as well as the opportunities Spelthorne offers for growth and set out four strategic options for development, a brownfield focus; a Green Belt focus; a Staines focus; or a combination of the above.

1.10 The key issues raised during the consultation were as follows:

- Concern over an increase in high rise development
- Loss of Green Belt
- The impact of development on infrastructure
- Affordable housing
- Parking
- Maintaining the vibrancy of Staines-upon-Thames

Preferred Options Consultation 2019

1.11 The public consultation on the Spelthorne Local Plan Preferred Options document took place between November 2019 and January 2020. The Consultation took the form of Policies and Site Allocations documents, setting out the preferred approaches to be considered. The selection of sites follows the preferred strategy, following the previous consultation, to maximise building on land in urban areas such as town centres, particularly Staines-upon-Thames, and to consider releasing some 'weakly performing' Green Belt for development.

1.12 The key issues raised during the consultation were as follows:

- Highways related issues (congestion / highway safety)

- Green Belt
- Infrastructure
- Housing
- Biodiversity and wildlife
- Pollution – Air / Noise / Water
- Flooding
- Site specific issues regarding proposed allocations

Pre-Submission Publication Version 2022

1.13 The public consultation on the final draft of the Local Plan (Regulation 19 consultation) took place from June to September 2022. The Pre-Submission Publication Version is the version of the Plan that the Council submitted to the Planning Inspectorate for examination by an independent Inspector. A schedule of proposed changes to the final draft Local Plan are submitted alongside the Plan for the Planning Inspector to decide which are appropriate.

1.14 The starting point for a Local Plan examination is the assumption that the Council has submitted what it considers to be a sound plan. The plan is positively prepared, based on a strategy which seeks to meet objectively assessed development and infrastructure requirements; is justified by robust evidence; can be delivered; and is consistent with national policy. The Pre-Submission Publication version of the Spelthorne Local Plan is considered to meet the test of soundness and is therefore a step closer to examination and eventual adoption.

Examination

1.15 The Examination[1] included a series of open public sessions which members of the public could attend and observe. At the Examination, officers and expert consultants appointed by the Council were questioned by the Inspector on how the Local Plan meets the test of soundness. Developers, Landowners, members of the public, residents' associations and other interested parties attended. Some were legally represented by barristers.

1.16 Following the Examination, the Inspector issued a report which concluded that the Spelthorne Local Plan provides an appropriate basis for the planning of the Borough, provided that a number of main modifications were made to it.

1.17 Following the Examination, the Inspector issued a report which concluded that the Spelthorne Local Plan provides an appropriate basis for the planning of the borough, provided that a number of main modifications were made to it.

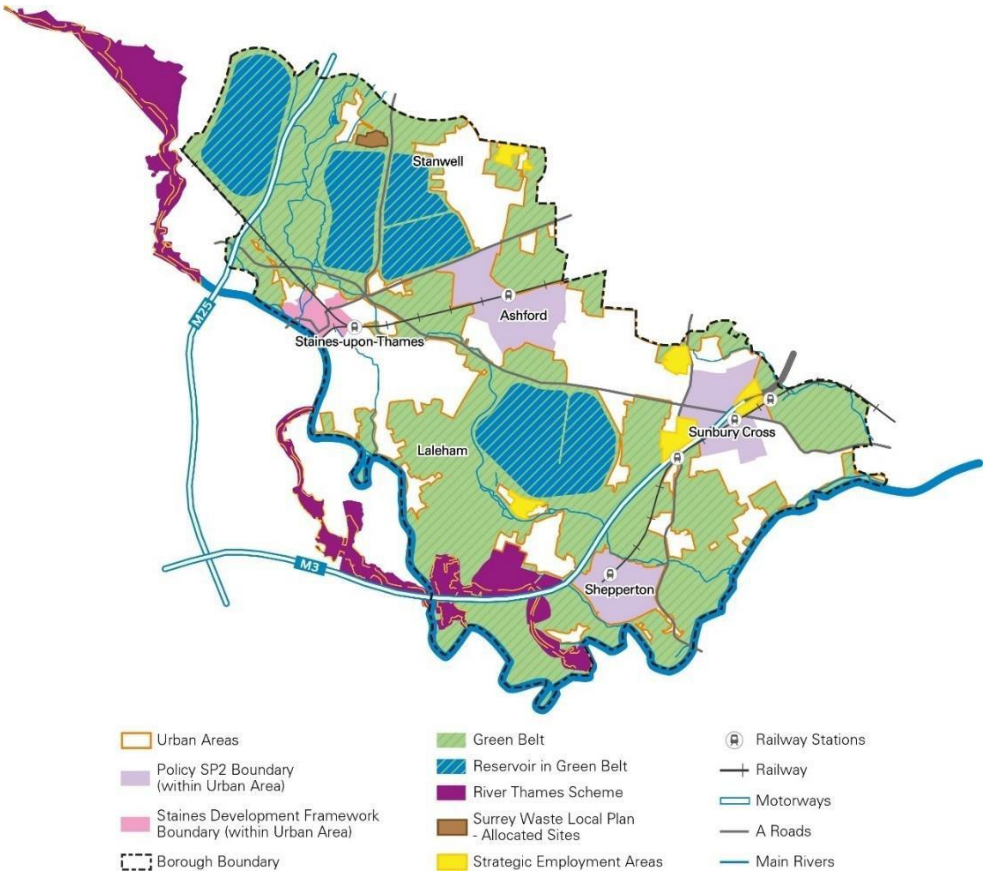
2. The Route to 2039/40

Spelthorne in 2022

2.1 Located in Surrey, approximately 16 miles from central London, Spelthorne benefits from good transport links to both London and the southeast via both the road and rail network. In addition, the proximity of Heathrow Airport and easy access to Gatwick via the motorway network further serves to make the Borough accessible and attractive to both individuals and businesses. Covering an area of approximately 19.75 sq. miles, Spelthorne has a population of 103,000 (2021) and is home to over 7,500 businesses including Pinewood (Shepperton Studios), dnata and Woodgroup ltd. Kempton Park is a key visitor attraction.

2.2 Located where the continuous built-up area of London gives way to a more dispersed pattern of urban areas and villages, the urban area of the Borough occupies about 35% of the total area, while the land outside the urban area covers about 65% of the Borough and is designated as Green Belt.

2.3 Spelthorne adjoins the River Thames and is crossed by two tributaries, the Ash and the Colne. The Borough is flat and low lying and consequently liable to flood. About 20% of the urban area is liable to flood in a 1 in 100 year flood event or surrounded by flood water and over 49% of the urban area would be flooded in a 1 in 1000 year event.



Maps 1: Key Diagram

Figure1: Spelthorne at a Glance

Population	**There are 99,900 people living in Spelthorne (mid-year estimate 2021).**	**Education & Skills**	**90.9% of people have a NVQ Level 1 qualification and above in Spelthorne compared to 87.7% across England (2020)[2].**
Access & Transport	Accessible transport and concessions available to all ages around Spelthorne. 85.2%[3] of households' own vehicles whereas 14.8% of households have no car in Spelthorne. This compared to the average in England where 25.8% have no car and 74.2% of households own vehicles	**Health & Wellbeing**	14.8% of people in Spelthorne are suffering from a long-term illness or disability which limits their daily activities. This is lower than the national average in England of 17.6%. Healthy life expectancy at birth is higher than the national average, 68.1 years for females and 68.9 years for males
Economy	82.2% of the population is economically active. 50.1% of the workforce is in a managerial and professional occupation.[4](Oct 2020 – Sept 2021).	**Homes**	42,870 homes in the Borough of which 72.5% are owned and 26% rented. The average house price is £425,000 Spelthorne (June 2021)[5]
Build	5,127 new homes built in the Borough between 2000 to 2021.	**Communities & Environment**	Spelthorne Borough is approximately 5,100 hectares or 20 square miles. Around 65% is Green Belt Wraysbury, Staines and King George VI reservoirs comprise part of the South West London Waterbodies Special Protection Area (SPA)
River	Spelthorne has 12 miles of River Thames frontage. 22% of the Borough is water including four large reservoirs and also a treatment works at Ashford.	**Business**	7,626 businesses including Pinewood (Shepperton Studios), dnata and Woodgroup Ltd. Around 3,500 residents employed directly by Heathrow Airport (2018)[6]

[2] https://www.nomisweb.co.uk/reports/lmp/la/1946157334/printable.aspx
[3] https://www.surreyi.gov.uk/2011-census/car-availability/
[4] https://www.nomisweb.co.uk/reports/lmp/la/1946157334/report.aspx?town=spelthorne#tabempunemp
[5] https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/medianpricepaidforsubnationalgeographiesexistingdwellingshpssadataset26
[6] https://www.heathrow.com/content/dam/heathrow/web/common/documents/company/local-community/being-a-better-neighbour/Community-Investment-infographic-Spelthorne-2018.pdf

Our Destination and Objectives

2.4 The **Spelthorne Corporate Plan (2021-23)** sets out our five overarching 'CARES' priorities and 15 more specific themes to focus on. By 2039/40 our **Local Plan** seeks to have achieved the priorities set out within it.

Community	**Our destination:** **Our communities are at the heart of everything we do, we have built strong relationships with our residents and businesses, and have forged links within those communities, so that they feel empowered, included, supported, safe and healthy.**

Strong Communities

2.5 We are working with our partners and the community to deliver high quality place making that incorporates amenities and services for all in Spelthorne.

2.6 The Local Plan is supporting this by:

- Engaging with individuals, residents' associations and other community groups so that they are better informed and have opportunity to participate in the Local Plan.
- Seeking the views of the local businesses community to support the vitality and resilience of our towns and economic areas, such as the Staines Business Improvement District.

Safe Communities

2.7 We have safe places to live, visit and do business, with safe streets and open spaces.

2.8 We are supporting this by:

- Working with Surrey County Council to make our roads safer for pedestrians and cyclists, with new cycle lanes/walkways and reduced speed limits where needed.
- Working with our partners and developers to ensure that high quality design, which supports natural surveillance and creates safe and welcoming streets and spaces is at the heart of placemaking in the Borough.

- Engaging with Surrey Police to identify additional needs from the new development that could be met through developer contributions.

Healthy Communities

2.9 Our communities are staying healthy for longer.

2.10 We are supporting this by:

- Working with our healthcare, voluntary and community partners to identify need for additional facilities that could be funded through developer contributions.
- Implementing policies which seek to improve residents' health and wellbeing, promote active and healthy lifestyles and tackle health inequalities.
- Supporting a range of leisure facilities to enable people to stay fit and healthy, including parks, our Green and Blue Infrastructure network, community gym equipment and leisure centres.

Enhancing Local and Strategic Infrastructure

2.11 We are supporting this by:

- We are supporting the provision of the right infrastructure to meet our communities' changing needs and the demands of a growing population.
- Working with partners we are identifying the necessary health, educational, leisure and cultural infrastructure to meet our needs, assisted by developer contributions.

Affordable housing	**Our destination:** **We have supported the delivery of affordable and market housing which meets the needs of all sections of our communities by supporting the development of new homes of a variety of type, size and tenure.**

Delivering New Homes

2.12 We are supporting this by:

- Allocating sites to meet our identified housing need.
- Implementing policies which provide a mix of homes for all members of our community.
- Working with colleagues and partners to promote the delivery of affordable homes that meet the needs of all our communities.

	Our destination: **We provided support to our business communities to help enable them to recover, be resilient to economic challenges, be dynamic and respond to the changing economic and retail climate.**

Supporting Economic Recovery

2.13 We analyse the needs for employment floorspace and implement and deliver policies which:

- Protect businesses premises.
- Assist future business growth and adaptation.
- Support placemaking, regeneration and development of infrastructure.
- Attract visitors to the Borough.

	Our destination: **We worked with our communities and partners to minimise our effects on the environment, played our part in tackling climate change and to moved further towards a clean, green and attractive Borough and protected biodiversity.**

Tackling Climate Change

2.14 We recognise the effects that climate change could have on our Borough. Having declared a climate emergency, we recognise the need to work with residents and businesses to achieve cleaner and greener lifestyles.

2.15 We are supporting this by:

- Ensuring Local Plan policies are in conformity with the Climate Change Strategy to require new development to incorporate measures to lower the Borough's carbon emissions.
- Working with the Environment Agency and through the Strategic Flood Risk Assessment, ensure that new development is directed to areas of lowest flood risk. Incorporating the River Thames (Flood Relief) Scheme and other flood mitigation initiatives withing the Plan.
- Conserving and enhancing our urban open spaces and Green and Blue infrastructure network, which plays a key role in the sustainable management of surface water run-off and holding floodwaters.
- Ensuring preservation of the Borough's valued historic environment.
- Enhancing and extending the Borough's Green and Blue Infrastructure network at all scales to deliver multiple benefits for people, wildlife and the environment.
- Mitigating the impact of the loss of Green Belt through the innovative use of Green and Blue infrastructure solutions to create high-quality space for people

and wildlife, while supporting the sensitive integration of new development into the wider landscape and Green Belt.

Delivering Sustainable Development

2.16 We have progressed towards more sustainable communities – which manage their social, environmental, and financial resources to meet current needs, while ensuring that adequate resources are available for future generations.

2.17 We are supporting this by:

- Implementing Local Plan policies to safeguard the environment against air, noise, light and water pollution and remediating land contamination.
- Local Plan policies and allocations which support the requirement for biodiversity net gain, through partnership working and the use of Nature Recovery Strategies.
- Implementing Local Plan policies to encouraging waste prevention and promote recycling.
- Implementing Local Plan policies to promoting sustainable travel, including actively supporting improvements to public transport access to Heathrow.
- Promoting residential development that is sustainably located with access to existing services and transport hubs.
- Promoting energy efficiency for new buildings and refurbishments.

	Our destination: **We delivered an efficient and effective Local Plan which provides for all sections of our communities.**

Effective Service Delivery

2.18 We are supporting this by:

- Ensuring Local Plan objectives cascade from Corporate Strategy and its priorities.
- Working with partners including Surrey CC, Surrey Police, NHS to ensure the provision of services to support our Borough's growing population.
- Identifying needs and communicating and collaborating with partners about the Borough's planned growth.
- Ensuring the Local Plan and its requirements on developers are viable and capable of delivery.
- Implementing and monitoring Local Plan policies and enforcing against those who do not comply with the requirements.
- Regularly reviewing and updating the Local Plan.

3. Strategy and Strategic Policies

3.1 The Spelthorne Local Plan 2024 – 2039/40 sets out how we can achieve a sustainable future for Spelthorne that protects and enhances our Borough, delivers a wide range of benefits for our residents and meets our future housing needs

3.2 The Plan seeks to deliver 10,726 homes over the Plan period, which equates to an average of 631 homes per year plus an additional 20% buffer has been added to the first five years of the plan. This figure is Spelthorne's objectively assessed need, based on the Government Standard methodology, which is set out in the NPPF and the accompanying Planning Practice Guidance.

3.3 In order to meet our housing need including need for Gypsy and Traveller sites, while managing the impact of new development on Staines, the Local Plan strategy agreed by the Council is to release a small amount (approximately 0.7% / 24.8 ha) of Green Belt. This approach will allow for more family homes with gardens to be built, as well as offering the opportunity for lower building heights in the more sensitive areas of Staines-upon-Thames.

3.4 The Council considers that it is only possible to achieve this by meeting our housing need in full and by demonstrating Exception Circumstances to amend Green Belt boundaries through the production of this new Local Plan.

ST1: Presumption in Favour of Sustainable Development

1) When determining development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). The Council will work proactively with applicants with the aim of finding solutions that mean that proposals can be approved wherever possible, in order to secure development that improves the economic, social and environmental conditions in the Borough.

2) Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in any neighbourhood plans adopted in the future) will be approved without delay, unless material considerations indicate otherwise.

3) Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision, then the Council will grant permission unless material considerations indicate otherwise, taking into account whether:

   (a) the application of policies in the National Planning Policy Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

   (b) any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole.

Reasoned Justification

3.5 The NPPF emphasises that all Local Plans should be based upon and reflect the presumption in favour of sustainable development. The principle informs both the policies and site allocations contained within the 'Local Plan: Strategy and Sites' and will be used to guide decision makers.

3.6 Local Planning Authorities are encouraged to include a policy within their Local Plan that embraces the presumption in favour of sustainable development. Policy ST1 meets this requirement and adopts the model wording suggested. When implementing Policy ST1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development. In accordance with policies in the NPPF that protect important natural and heritage assets, the presumption will not automatically apply to: habitats sites (including sites protected under the Birds and Habitats Directives) and/or designated as Sites of Special Scientific Interest (SSSIs), development requiring appropriate assessment because of its potential impact on a habitats site, land designated as Green Belt, or Local Green Space, designated heritage assets, and or locations identified as at risk of flooding.

Key Evidence

- National Planning Policy Framework (NPPF) 2021

ST2: Planning for the Borough

1) The housing requirement for Spelthorne is 631[7] dwellings per annum over the plan period (2024 – 2039/40), plus an additional 20% buffer has been added to the first five years of the plan meaning a total requirement of 10,726. During the plan period, provision has been made for at least 9,900 new homes. Table 1 shows the contribution of all sources of housing supply.

2) Economic growth in Spelthorne will be supported by maintaining and intensifying the use of the Borough's employment floorspace offer. This will be done by;

    - safeguarding employment land,
    - provision of new land in line with needs identified through the most up to date evidence and
    - encouraging its innovative re-use in ways that better meet the needs of the market.

3) Provision for new permanent pitches for Gypsies and Travellers and new permanent plots for Travelling Showpeople (as defined by Planning Policy for Traveller Sites) to meet the accommodation needs in the Borough which are identified in the most up-to- date Gypsy and Traveller Accommodation Assessment (GTAA).

4) 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.

5) The Council expects that all development will, at a scale proportionate to the proposal, make a positive contribution to achieving the relevant targets relating to climate change and Biodiversity Net Gain.

Reasoned Justification

3.7 National policy requires that we meet objectively assessed housing needs, including any unmet needs from neighbouring authorities, where it is practical to do so and consistent with achieving sustainable development. Spelthorne's objectively assessed housing need has been based on the Government standard methodology set out in the NPPF 2021 and accompanying Planning Practice Guidance.

3.8 Spelthorne's total housing supply over the plan period (2024-2039/40) is indicated in the table below and will comprise homes from a variety of sources in addition to the Local Plan's site allocations.

[7] As calculated using the standard method for assessing housing need at 2019 with a base date of 2024. The Council will review the local housing need figure as and when appropriate, guided by the Government's approach to assessing housing need.

Sources of supply over the plan period: 2024 – 2039/40 (net number of homes)[8]

Source	Approx. number of units	Comments
Allocations	5,672*	792 in Green Belt 4,902 in Urban area 5% under-delivery discount applied
Brownfield Tier 2 sites (> 5 units)	997**	5% under-delivery discount applied
Windfall: Small sites	688	43 per annum x 16 years
Windfall: Office to residential permitted development	486	54 per annum in 6-10 years 36 per annum in 11-16 years
Under construction	1,457	As of 31 March 2024
Extant permissions not started	600	5% under-delivery discount applied
Total	**9,900**	
Average per annum	**619**	

* Yields identified in the Local Plan supersede that identified in the SLAA for allocated sites.
** Excluding sites identified for allocation in the Local Plan

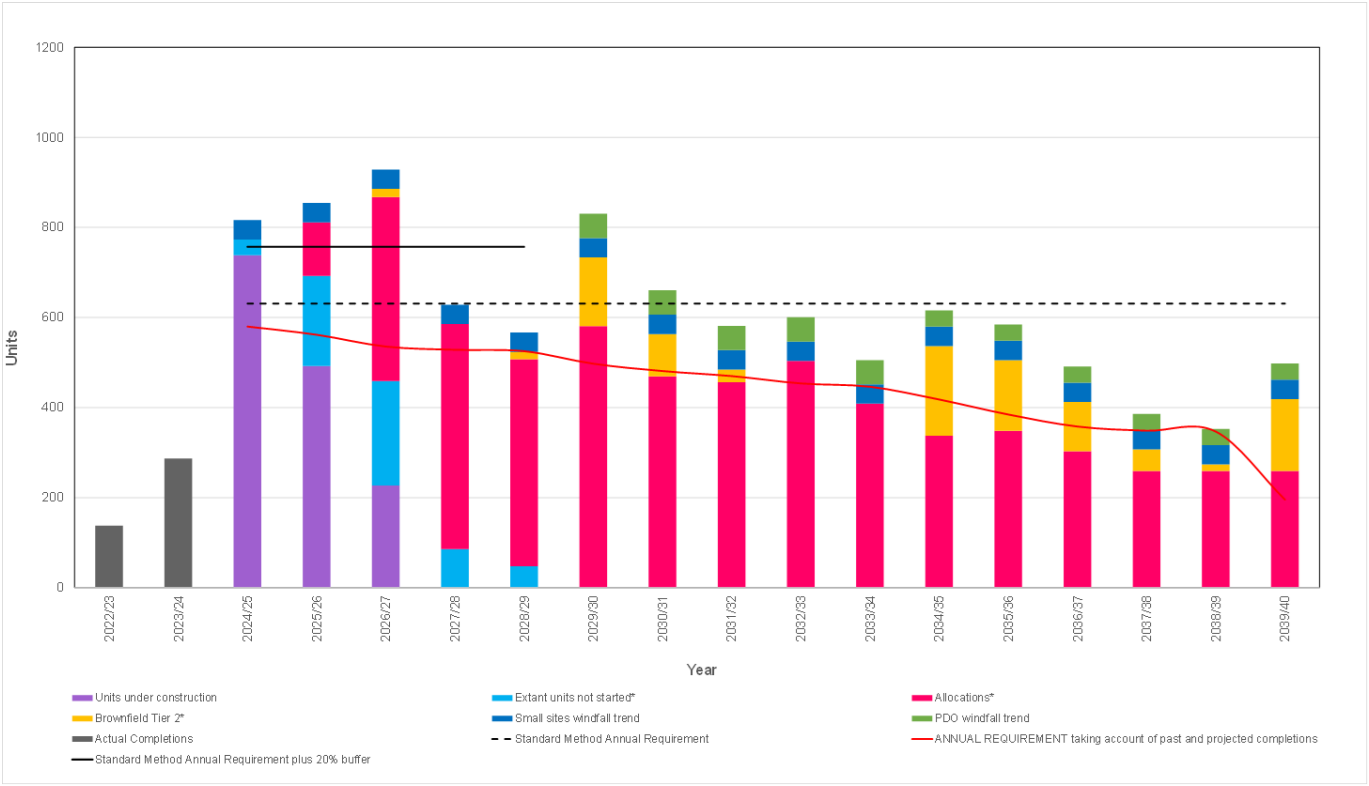
Table 1- Summary of housing trajectory requirement and projected completions

Year	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40
Standard Method Annual requirement	631	631	631	631	631	631	631	631	631	631	631	631	631	631	631	631
Standard Method Annual Requirement plus 20% buffer	757	757	757	757	757	757	631	631	631	631	631	631	631	631	631	631
Rolling requirement	757	1514	2271	3028	3785	4416	5047	5678	6309	6940	7571	8202	8833	9464	10095	10726

[8] Housing need is an unconstrained assessment of the number of homes needed in an area whereas housing supply is the number of homes anticipated to be delivered in the local authority area to meet these needs.

Projected completions	816	854	928	628	566	830	660	582	601	506	616	584	491	386	353	498
Projected completion rolling	816	1670	2599	3227	3793	4624	5284	5866	6466	6972	7587	8172	8663	9049	9402	9900

Housing Trajectory to 2039/40



3.9 Spelthorne has an annual requirement for 631 homes per annum, which has been determined using the Government's standard methodology for calculating local housing need (LHN). The methodology uses the official 2014 household projections with an uplift to take account of local affordability.

3.10 The Council has produced a Strategic Land Availability Assessment (SLAA) to identify which parcels of land in the urban area could help to meet development needs and has also undertaken a Green Belt Assessment to determine which areas are weakly performing and could be released from the Green Belt. These evidence base documents have informed the sites identified for potential allocation in the Local Plan.

3.11 Not all sites identified in the SLAA have been allocated in the Local Plan due to their non-strategic nature and the lack of benefits identified from an allocation. As such they are expected to be delivered as windfall development and are identified as 'Brownfield Tier 2' sites. In addition, an allowance for small sites and office to residential permitted development has been identified based on past trends. Sites under construction as of April 2024 are included within the

supply, with a 16-year period from 2024 to 2039/40.

3.12 Spelthorne sits within a housing market area (HMA) with Runnymede Borough Council. Spelthorne shares its strongest economic links with Runnymede, Elmbridge and the London Boroughs of Hillingdon & Hounslow and together these authorities sit within a Heathrow focussed Functional Economic Market Area (FEMA). Runnymede has recently had its Local Plan examined. The Runnymede Local Plan will make provision for a minimum of 7,480 net additional dwellings over their plan period, a 20,000 sqm business park in New Haw and a 79,025sqm (7,350sqm net) office/business park at the Longcross Enterprise Zone. They are also seeking to deliver a minimum of 7,540sqm net retail floorspace and a minimum of 60,260 sqm net employment floorspace delivered in Runnymede Borough's Strategic Employment Areas.

Key Evidence

- Strategic Housing Market Assessment (2015) and SHMA update (2019)
- Gypsy and Traveller Accommodation Assessment (2018)
- Employment Land Needs Assessment (Spelthorne Borough Council, 2018)
- Employment Land Needs Assessment Update (2022)

ST3: Local Plan Early review

1) The Local Planning Authority will undertake a review of the Local Plan 2024-2039/40 immediately following the adoption of this Plan. An updated or replacement plan will be submitted for examination no later than two years from the date of adoption of this Plan. The updated or replacement Local Plan will cover all policies (save for matters of development management) but will focus on the following matters that have been specifically identified during the preparation and examination of this plan:

- Housing requirement for the whole Borough based on the most up-to-date national guidance (as at the date of submission).
- Monitoring housing delivery including the progress and implementation of sites allocated in this plan to inform the Local Plan review.
- 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.
- Updating the Gypsy Traveller and Travelling Show People Needs Assessment, in light of the update to Planning Policy for Traveller Sites (2024).
- Assessment of each policy and its conformity to the NPPF.

2) The replacement plan will secure levels of growth that accord with Government policy.

3) The review will also serve to build upon existing strong, working relationships with adjoining and nearby authorities and may result in the preparation of a joint evidence or policies based upon wider functional geographies.

3.14 Policy ST3 commits to an updated or replacement Plan to be submitted no longer than two years from the date on adoption of this Local Plan. The new Local Plan will be submitted in 2027 and run 15 years from adoption. This will allow the Council to consider longer-term requirements, including the specific issues identified through the production and Examination of this Plan.

3.15 To seek to meet additional growth needs, the new Local Plan will be based on further work and evidence and fully consider spatial options.

3.16 This Plan has met the requirements of the Duty to Co-operate and in preparing the new Local Plan future work to identify potential locations for sustainable growth will be undertaken by working collaboratively with neighbouring authorities, central government and other relevant bodies. The Local Planning Authority will also work with these and other relevant authorities to understand and plan for any long-term strategic infrastructure requirements arising from future growth.

3.17 The review will consider all appropriate environmental legislation and/or protections and where possible policies should enhance the natural and local environment. Future development, wherever possible, should help to improve local environmental conditions taking into account relevant information and data known at the time. The review will also need to take account of relevant national and local guidance and/or policies relating to design including matters such as character and heritage.

3.18 There may be changes in circumstances that we cannot currently foresee, or are yet to understand the full implications of, but which have a substantial impact upon the Borough. This might be changes to the way in which the planning system operates, structural changes to the population or the way we live, work or spend our leisure time in response to for example climate change or any other future event.

3.19 It is anticipated that the review process outlined in Policy ST3 will be the most appropriate means of considering these matters, but the Council may also consider focussed reviews of individual or small groups of policies prior to this where necessary.

4. Place Shaping

4.1 The National Planning Policy Framework (NPPF) 2021 attaches great importance to the design of the built environment and states that good design should contribute positively to making places better for people. Development should contribute to creating places that encourage mixed communities, promote walking and cycling, improve access to public transport, and ensure that new development connects with existing parks and open spaces for recreation. Our Plan will also protect the Borough's historic environment, including our listed buildings and Conservation Areas, which contribute to the Borough's character, sense of place and quality of life.

4.2 The Council declared a climate emergency in October 2020 and recognises that climate change is the greatest challenge currently facing us. Every decision we take must count towards reducing carbon emissions, climate change mitigation and adaptation. Our Local Plan will help to support the transition to a low carbon future, helping to address the climate emergency, taking account of flood risk.

Responding to the Climate Emergency

4.3 The Local Plan plays a key role in addressing the climate emergency by reducing carbon dioxide emissions and supporting the transition to a zero carbon future. As well as helping to deliver improvements to flood risk, air quality, recycling and waste management.

4.4 Our climate is changing as a result of human activity and this will have substantial implications for society and our environment if we do not act. The council is committed to responding to climate change and has declared a climate change emergency in October 2020 joining a growing number of domestic and international authorities that have adopted a carbon-neutral target. Across the Council's services, all strategic decisions, budgets and approaches to planning decisions will be aligned with the goal of achieving a shift to carbon neutrality. The Council intends to accelerate its efforts by introducing greener buildings, transportation, greener investments and increasing renewable energy.

4.5 Working with other Surrey districts and Boroughs, and Surrey County Council, Surrey's Greener Futures Climate Change Strategy (2020-2050) and Climate Change Delivery Plan (2021) have been produced. The Local Plan will play a central role in delivering a number of aims set out in both. A central thread of the Local Plan is to plan for a low-carbon future in which carbon emissions and other greenhouse gases are reduced and we tackle and adapt to the new climatic norms.

4.6 The council will take a proactive approach to mitigating the effects of, and adapting to, climate change to ensure the future resilience of both communities and infrastructure. This includes locating new development in locations that reduces reliance on private motor vehicles as well as being designed and constructed in a way to achieve low or zero carbon buildings and facilitates more sustainable lifestyles including supporting the ability to work flexibly.

PS1: Responding to the Climate Emergency

1) All development must respond to the climate emergency by:

    (a) Directing development towards locations that minimise the need to travel and maximise the ability to make trips by sustainable modes of transport including cycling, walking and public transport.
    (b) Delivering an efficient use of land especially on the most accessible sites.
    (c) Providing more walkable and cyclable neighbourhoods (Twenty Minute Neighbourhoods) that reduce demand for the use of private vehicles.

2) Sustainable design and construction will be integral to new development in the Borough. All planning applications[9] must include evidence that the below will be addressed, using as a minimum the Sustainable Construction Checklist:

    (a) Maximising energy efficiency and integrating the use of renewable and zero carbon energy (demonstrated though an energy statement);
    (b) Optimising the site orientation, building form, layout, landscaping and materials to maximise natural light and heat, whilst avoiding internal overheating by providing passive cooling and ventilation;
    (c) Incorporate sustainable construction and demolition techniques that provide for the efficient use of minerals including a proportion of recycled or secondary aggregates, and encourage the re-use of construction and demolition waste at source or its separation and collection for recycling;

3) In residential development (including replacements, conversions and subdivisions)

    (a) Achieve water efficiency of 110 litres per person per day[10] and where feasible provide rainwater harvesting techniques;
    (b) Where CHP distribution networks already exist, new developments are required to connect to them or be connection-ready, unless it can be clearly demonstrated that utilising a different energy supply would be more sustainable or connection is not feasible. The impacts of the CHP plants emissions upon air quality must be assessed in accordance with Policy E4;
    (c) Incorporate measures for the secure storage of cycles and storage of waste including recyclable waste;

4) Proposals for zero carbon development are strongly supported and the development of renewable, low and zero carbon and decentralised energy[11], are strongly supported and encouraged.

[9] With the exception of applications for small householder extensions such as conservatories and porches and advertisement consent or prior notification

[10] Through compliance with the Building Regulations which state that planning conditions can set the requirement to 110 litres rather than 125 litres.

[11] Where meeting the air quality requirements of Policy E4

5) Applications for major development are expected to include information setting out:

   (a) how the energy hierarchy has been applied and how sustainable design and construction practice will be incorporated.
   (b) applications should be accompanied by Construction Management Plans, which seek to manage the impact of construction traffic on the local and strategic transport networks

6) Smaller developments (including refurbishment, conversion and extensions to existing buildings) should include information proportionate to the scale of the development proposed.

Definitions

4.7 Zero carbon development means development where emissions from all regulated energy use are eliminated or offset. This definition may be reviewed in the future.

4.8 The definition of major development includes residential development of 10 dwellings or more (gross) and non-residential development of 1,000 sqm gross new floorspace or more.

4.9 Sustainability and energy statements should set out a level of detail proportionate to the scale of development.

Reasoned Justification

4.10 In June 2019, the Government announced that the UK will 'eradicate its net contribution to climate change by 2050' by legislating for net zero emissions – the first G7 country to do so. In order to reach this target, all buildings will need to be net zero carbon by 2050. In October 2020 Spelthorne Borough Council declared a climate emergency and has committed to work with the local community and all other relevant partner agencies to support making the Borough carbon neutral as soon as practically possible.

4.11 The Royal Town Planning Institute (RTPI) considers climate change to be one of the most crucial issues facing our communities today, and the increasing occurrence of severe climate-change related weather events is just a reminder of the urgency of this issue. The RTPI have asked the Government must reintroduce the requirement for all new-build homes to be zero-carbon[12] and resources should be made available to help existing homes become carbon neutral.

4.12 The Council considers that sustainable design is indivisible from good design and that requiring sustainable design features in development is justified. The NPPF (para 152) sets out that the planning system should help to shape places in ways that

[12] A zero-carbon homes policy was axed in 2015 by then business secretary Sajid Javid, without consultation, a year before the policy was supposed to be introduced.

minimise vulnerability and improve resilience and support renewable and zero carbon energy and associated infrastructure. The NPPF also sets out that planning should provide net gains in biodiversity.

4.13 The Planning Policy Guidance note titled Housing: Optional Technical Standards, sets out standards which can be adopted in Local Plan policies which go beyond the mandatory requirements of the Building Regulations for water efficiency and accessibility.

4.14 The policy sets a thermal performance target (higher fabric energy efficiency standard) exceeding current national because it is important to ensure that buildings do not need to be retrofitted at expense at a later date when more demanding regulations are introduced. For example if the Government proceeds with the Climate Change Committee's recent proposal that from 2028 no home should be able to be sold unless it reaches EPC B and C. This will also help safeguard against future heat decarbonisation pathways, by ensuring that new buildings can more easily transition to lower carbon heating sources in the near future. This is particularly pertinent for decarbonisation trajectories involving heat pumps, as effective use of the technology will require highly insulated and draught-proofed buildings to operate efficiently.

4.15 The South East of England is likely to face significant challenges from changing climate and weather patterns. To avoid the costs associated with retrofitting and replacement new buildings should be future proofed, suited to, and easily adaptable for, the range of climate conditions and weather patterns we are likely to see over the next century, and adaptable to new technologies. The buildings we build today are likely to be with us into the next century, therefore it is beneficial to build adaptable and efficient developments.

4.16 The purpose of the checklist is to highlight sustainable construction matters that developers can consider. It is not intended to duplicate the elements of sustainable construction that are incorporated into the building regulations. It will enable the Council to assess which sustainable construction principles have been considered in development proposals for new build and/or refurbishment of existing buildings, but does not seek to prescribe a set standard or requirement. The Council encourages a holistic approach where sustainable construction considerations are taken fully into account from initial project thinking through to development completion. This approach should achieve high quality sustainable development which is responsive to people's needs and can help avoid unnecessary project delay.

4.17 The future is likely to see a mix of zero carbon technologies used for heating. A government publication Clean Growth: Transforming Heating, an evidence review of the options for decarbonising heat, concluded that it is unlikely that there will be a one-size-fits all solution, so multiple technologies will play a role. The Future Homes Standard expects heat pumps will become the primary heating technology for new homes. The consultation response document states heat pumps are highly efficient, providing around three times the amount of heat compared to the electricity used. It goes on to say heat networks will also have an important role to play and are often an excellent solution for new buildings in towns and cities because of their ability to integrate the lowest-carbon heat sources. Heat networks are the only way to exploit larger scale renewable and recovered heat sources such as energy from waste, waste heat and heat from rivers and mines.

Monitoring Indicators

Indicator	Target	Data Source
Megawatts of installed small scale low and zero carbon energy capacity	Increase in number	Ofgem Feed in Tariff quarterly reports
Number of new dwellings complying with higher water efficiency standard	All new homes to comply with standard	Building regulations final certificates
Number of new dwellings complying with the new thermal performance targets	Achieve standard set out in PS1(5)	Fabric Energy Efficiency Standard (FEES), Building regulations final certificates
Number of commercial premises built to BREEAM 'Very good' or better	Achieve Very good or better rating	In house monitoring
Installed renewable/low carbon energy capacity (MW/h)	To increase renewable energy capacity	In house monitoring

Key Evidence

- RTPI (2018): Rising to the Climate Crisis: A Guide for Local Authorities on Planning for Climate Change. Available at https://www.rtpi.org.uk/media/3568/rising-to-the-climate-crisis-1.pdf
- The New Homes Policy Playbook, 2021, Available at: https://www.ukgbc.org/wp-content/uploads/2021/01/New-Homes-Policy-Playbook-January-2021.pdf
- The Future Homes Standard: 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings Summary of responses received and Government response. Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/956094/Government_response_to_Future_Homes_Standard_consultation.pdf

PS2: Designing Places and Spaces

1) The Council will require a high standard in the design and layout of new development. Proposals for new development should demonstrate that they:
    - will create buildings and places that are attractive with their own distinct identity;
    - will respect and make a positive contribution to the street scene and the character of the area in which they are situated; and
    - will pay due regard to the scale, height, proportions, building lines, layout, materials and other characteristics of adjoining buildings and land;
    - have been developed in accordance with the principles set out in the National Model Design Code and have regard to any design polices and codes which are produced.

Impact on Neighbours

2) Proposals for new development should demonstrate that they will achieve a satisfactory relationship to adjoining properties avoiding adverse and un-neighbourly impacts in terms of loss of privacy, daylight or sunlight, or overbearing effect due to bulk and proximity or outlook.

Accessibility

3) All new development will be designed to meet the needs of all users and be accessible to all. This includes the setting of the building in the wider environment, the location of the building on the plot, the gradient of the plot, transport infrastructure and public realm.

Landscaping

4) All new development should:
    (a) incorporate landscape to enhance the setting of the development;

    (b) avoid the loss of trees and other vegetation worthy of retention and supplemented with additional high-quality planting, or where retention is not feasible or desirable provide for high quality replacement planting; and

    (c) provide for suitable boundary treatment to enhance the setting.

Public Realm

5) All development proposals should:
    (a) seek to positively impact on public realm through:
        - enhancing the quality of existing public realm where appropriate;
        - establishing relationships between development proposals and existing public realm;
        - maximising opportunities to create new public realm where appropriate.

    (b) ensure that public realm is well-designed, safe, inclusive, attractive, well-connected, adaptable, related to the local and historical context and easy to understand, service and maintain. Landscape treatment, planting, street

(c) furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable; and

(a) seek to incorporate green infrastructure such as street trees and other vegetation into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, moderate surface and air temperature and increase biodiversity; and

(b) ensure appropriate management, maintenance and governance arrangements are in place to secure the quality of public realm in perpetuity.

Safe, Connected and Efficient Streets

2) All new development will be designed:

(a) in a manner which is safe and welcoming, supporting natural surveillance through the use of active frontages and mixed used development. This will ensure maximum opportunities for natural security through layout and design, to reduce opportunities for crime and antisocial behaviour; and

(b) Secured by Design standards should be incorporated and consideration given to how an area functions at different times of day, on different days of the week and throughout the year.

(c) to ensure it connects appropriately to existing street patterns and creates safe and accessible spaces. Proposals should offer safe, attractive, legible and permeable routes which are suitable for all users, linking people with places through active and sustainable travel choices delivered to best practice standards and in accordance with the principals set out in the National Model Design Code[13] and Manual for Streets[14].

Major Developments and Allocated Sites

3) Given the size, function and proposed density of major developments, particularly those exceeding 50 dwellings, tall buildings and/or allocated sites on former Green Belt land, it may not always be desirable to reflect locally distinct patterns of development. These sites should create their own identity to ensure cohesive and vibrant neighbourhoods. High rise development in appropriate locations will be expected to be supported by a visual impact assessment and demonstrate a positive contribution to the skyline through its architectural merits.

4) On a case-by-case basis, it may be appropriate for larger developments to be shaped by a design review panel process proportionate to their scale and significance, at the applicant's expense, and in conjunction with the Council.

[13] www.gov.uk/government/publications/national-model-design-code and any subsequent updates
[14] www.gov.uk/government/publications/manual-for-streets and any subsequent updates

Definitions

4.18 The public realm includes all the includes all publicly accessible space between buildings, whether public or privately owned, including but not limited to streets and squares, public open spaces and river environs.

Reasoned Justification

4.19 High quality in the design and layout of new development is fundamental to achieving identified needs and creating places where people want to live and will thrive. Design is not just limited to the appearance of development, it includes many other elements such as layout and orientation which can contribute to creating safe and secure environments and will impact how much energy occupiers use over a buildings lifetime. The design of the built environment has a direct effect on how places are used. The relationship between buildings, spaces and landscape is important as well as the more detailed design and materials used. Good design will influence how people move around our settlements, how they interact and how places make people feel. When considering applications, the Council place a high value on good design because of its importance and how it affects people's daily lives.

4.20 The NPPF states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Urban design and architecture can contribute to health outcomes through encouragement of more active lifestyles. Development should be encouraged to create places that result in mixed communities. It should cater for the needs of different types of people, including the young and old, encourage walking and cycling, improve access to public transport, and ensure that new development connects with existing parks and open spaces for recreation. Building exteriors and public realm should be designed in a way that contributes to pedestrian friendly environments.

4.21 Planning applications must be supported by design statements and the Council expects these to show how all the issues covered in the policy have been addressed. The level of detail required will be proportionate to the scale and nature of the development and for some small scale proposals, such as domestic extensions, some of the criteria may not be relevant.

4.22 The Council's current SPD on design[15] elaborates on this policy and is intended to be a practical guide to help achieve high standards of design. It is aimed at a wide audience which includes home owners, architects, developers and those affected by planning proposals.

4.23 Sport England have developed 10 principles to inspire and inform the layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and active lifestyles. Below is a brief overview of these six of these principles which are supported by the Local Plan:

- Activity for all neighbourhoods: Enabling those who want to be active, whilst encouraging those who are inactive to become active.
- Walkable communities: Creating the conditions for active travel between all locations.

[15] Design of residential extensions and new residential development

- Connected walking and cycling routes: Prioritising active travel through safe, integrated walking and cycling routes.
- Co-location of community facilities: Creating multiple reasons to visit a destination, minimising the number and length of trips and increasing the awareness and convenience of opportunities to participate in sport and physical activity.
- Network of multifunctional open space: Providing multifunctional spaces opens up opportunities for sport and physical activity and has numerous wider benefits.
- High quality streets and spaces: Well-designed streets and spaces support and sustain a broader variety of users and community activities.

4.24 Consideration of detailed design and the need for a Design Review Panel should take account of the site's context, including whether it is located in a sensitive location, the scale, height and density of the surrounding built environment and the potential for change to meet local development needs. To ensure reasonable application of PS2.8) to larger sites allocations, a site-specific requirement on design review is included where a site's anticipated yield incorporates 75+ dwellings. This requirement states that detailed design should be developed collaboratively between the applicant and the local planning authority (LPA) and encourages use of a Design Review Panel where it can positively shape development.

Key Evidence

- Building for Life 12: The sign of a good place to live (Design Council, Third Edition 2013, available online at : www.designcouncil.org.uk/fileadmin/uploads/dc/Documents/Building%2520for%2520Life%252012_0.pdf)
- By Design, Urban Design in the planning system: towards better practice (DETR, 2000, available online at: www.designcouncil.org.uk/fileadmin/uploads/dc/Documents/by-design_0.pdf)
- Active by Design: Designing places for healthy lives – A short guide (Design Council, 2014, available online at: www.designcouncil.org.uk/fileadmin/uploads/dc/Documents/Active_By_Design_Brochure_web_LATEST.pdf)
- Technical housing standards – nationally described space standards (DCLG, 2015, available online at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1012976/160519_Nationally_Described_Space_Standard.pdf)
- Secured by Design, Design Guides (Various years, available online at: www.securedbydesign.com/guidance/design-guides)

PS3: Heritage, Conservation and Landscape

1) The Council will seek to preserve and enhance as appropriate the architectural, historic and landscape character of the Borough. The Council will also expect all new development proposals to make a positive contribution to the environment taking account of any relevant design codes.

Heritage

2) Proposals for development which may affect any heritage asset (designated or undesignated & including listed buildings) will be required to demonstrate, through the submission of appropriate appraisals and investigations and in a Design and Access Statement, that the asset and its setting will be conserved and enhanced.

3) The Council will support appropriate development which seeks to maintain, sustain and enhance the significance and special architectural and historic interest of Listed Buildings in the Borough.

4) Considerable weight will be given to the protection of a listed building and its setting. Development of a listed building, or development within the curtilage or within the vicinity of a listed building or structure, should conserve and/or enhance its setting and any features of special architectural or historical interest which it possesses

5) Proposals for extensions and or alterations to heritage assets must demonstrate that the development will respect the historic form, setting, fabric and any other aspects that contribute to the significance of the host building. Any features of architectural or historic interest should be retained in situ and repaired rather than replaced wherever possible.

6) The Council will keep under review all non-designated assets identified as being of local importance or distinctiveness and will, as necessary, identify new assets which contribute to the local character or distinctiveness of the area.

7) Where any heritage asset appears to be at risk, either through neglect, decay or other threats, and where its loss would cause significant harm, the Council will work with owners to secure the enhancement of the asset and its setting for the benefit of the local character, in conjunction with other partners.

Scheduled and Ancient Monuments & Archaeological Areas

8) Proposals for development will be required to conserve, and where appropriate, enhance the significance, historic features and importance of Scheduled and other nationally important ancient monuments (as shown on Policies \Map). Proposals which improve public access to, or the understanding of, a Scheduled Monument in a manner consistent with its conservation, will be supported.

9) Proposals for development which adversely affect the physical survival, setting or overall heritage significance of a scheduled or other nationally important ancient monument will not be supported.

10) Proposals for development on sites which affect, or have the potential to affect:
    - Scheduled Monuments;

- County Sites of Archaeological Importance (CSAI) or Areas of High Archaeological Potential (AHAP), as shown on the Policies Map
- all other sites which exceed 0.4ha in size. should:

(a) Submit an archaeological assessment, and where appropriate the results of a site evaluation (and, should remains have been identified, an accompanying archaeological mitigation strategy) with a planning application.

(b) Where archaeological finds are identified the first consideration will be in situ preservation. Where it can be demonstrated to the satisfaction of the Council that this is not feasible, the Council will require adequate excavation and an accurate record to be made of any archaeological remains which will be destroyed and the results to be made publicly accessible via the publication and archiving of any material recovered.

Conservation Areas

11) The Council will continue to conserve and enhance the character and setting of the existing conservation areas, as shown on the Policies Map. The Council will require proposals for new development to demonstrate that they will make a positive contribution to the setting and local character of the conservation area

Tree Preservation Orders

12) The Council will seek to ensure the effective use of Tree Preservation Orders to protect significant trees and will encourage the proper care and maintenance of trees by requiring owners to submit applications to work on protected trees and ensure that protected trees are replaced, if they have to be felled, with a suitable replacement.

Landscape

13) The Council will seek that new development respects the existing landscape character, avoids harm, and provides for the positive enhancement of the landscape by the design, scale and setting of any new building. Reference should be made to the most up-to-date Landscape Character Assessment or equivalent.

14) Development which would have a significant detrimental effect on the landscape setting of the Borough will only be permitted where it can be demonstrated that the harm is outweighed by substantial public benefits or other benefits that outweigh the harm to or loss of the landscape setting.

15) The Council will work with its partners in the public, private and voluntary sectors to develop and secure the implementation of projects designed to improve and maintain the landscape, particularly areas which have become degraded, derelict or contaminated and where remediation is necessary to provide opportunities for landscape enhancement and public enjoyment.

Reasoned Justification

4.25 The Borough contains an important legacy of historic buildings including nearly 200 statutorily Listed Buildings and a further 160 buildings and structures of local architectural or historic interest. Many of these are located within the eight Conservation Areas.

4.26 The Council will not support redevelopment proposals that would involve the loss of locally listed buildings or other structures, or unsympathetic proposals that would damage their character and setting.

4.27 The NPPF requires local authorities to identify opportunities for the conservation, enjoyment and enhancement of heritage assets and their setting whilst having regard to the need to reflect and enhance local character and distinctiveness.

4.28 The NPPF also requires that new development is visually attractive and contributes to and enhances the natural and local environment and is sympathetic to local character and landscape.

4.29 The NPPF recognises that heritage assets are irreplaceable resources and requires Local Authorities to maintain and strengthen their commitment to stewardship of the historic environment, and to adopt suitable policies to protect it. The Council will work with partners such as Historic England and others to ensure that buildings of heritage value are maintained.

4.30 There are four scheduled ancient monuments within Spelthorne and these are:

- Caesar's Camp at Matthew Arnold School, Kingston Road SAM No. 146
- Anglo-Saxon cemetery, west of Saxon Primary School, Briar Road SAM No. 142
- Chertsey Bridge SAM No. 68
- Lord Knyvett's Schoolhouse, High Street, Stanwell SAM No. 147

Key Evidence

- Register of Heritage Assets (available online at: https://historicengland.org.uk/advice/hpg/heritage-assets/nhle/)
- Register of Buildings at Risk (available online at: https://historicengland.org.uk/advice/heritage-at-risk/buildings-at-risk/)
- Listed Buildings (statutory list) (available online at: https://historicengland.org.uk/listing/what-is-designation/listed-buildings/)
- Local List of Buildings and Structures of Historic Interest (available online at:

  Listed and locally listed buildings' information - Spelthorne Borough Council)

  https://historicengland.org.uk/advice/hpg/has/locallylistedhas/)
- UK Heritage at Risk Register (available online at: https://historicengland.org.uk/advice/heritage-at-risk/search-register/)
- Conservation Areas (available online at: https://historicengland.org.uk/advice/hpg/has/conservation-areas/)
- Landscape Character Areas (Spelthorne map available at: https://www.surreycc.gov.uk/ data/assets/pdf_file/0005/75776/Surrey-LCA-2015-SPELTHORNE-figure-18-Character-Areas.pdf)
- Archaeological Areas (available at: https://historicengland.org.uk/advice/hpg/has/archaeologicalimportance/ , also Spelthorne archaeological sites: http://www.cartogold.co.uk/spelthorne/text/saved_policies_09/appendix_5.html)

5. Spatial Policies

5.1 The spatial policies provide the basis around which the Council can secure improvements to the centres in the Borough. This allows for all development needs to be considered within suitable locations including housing, as well as employment and retail space. This is reflected through an area-based approach which sets out a hierarchy for development types, which suit the size and character of the area. This will lead to improvements to the benefit of residents and users through enhanced public spaces and accessibility.

5.2 As well as considering the urban environment, there is also an approach to the Borough's river network and water quality issues. This allows for opportunities to improve the local environment and biodiversity as well as ensuring that impacts on the network are avoided or mitigated.

SP1: Staines-upon-Thames

Strategy

1) Staines-upon-Thames is a vibrant, riverside, market town and is the principal town centre in Spelthorne. It is well positioned with excellent road links to Heathrow Airport, Central London and the rest of Surrey. It has rail links to central London, Reading and Windsor, although it lacks a direct rail link to Heathrow. Recognising its size, location, accessibility and significant opportunity for further regeneration, Staines-upon-Thames will be a key focus for housing, employment and retail development in the Borough.

Character and Design

2) In order to ensure that development in Staines is coherent and sustainable, all new development should deliver high quality design which considers its context and is of an appropriate height and density for its setting. Proposals should be developed in accordance with the principles set out in the National Model Design Code[16] and should have regard to any design polices and codes which are produced.

3) Future design polices and codes will provide guidance on the appropriate heights and densities in sensitive locations within the Town Centre and on the river frontage and also highlight locations where higher-density developments, complying with clear design principles, would be best located.

4) The Staines Conservation Area (shown on the Policies Map) will be preserved and enhanced. New development will be required to make a positive contribution to its setting and proposals which protect and enhance the local character of the area will be supported.

Infrastructure

5) Growth of the town will be dependent on enhanced infrastructure, particularly to capitalise on the proximity to Heathrow Airport. The Council will support proposals that facilitate new and improved public and sustainable transport links, education facilities, healthcare services, and social and community uses in accessible locations, working with infrastructure providers to identify projects for funding.

[16] National Model Design Code - GOV.UK

6) Flood risk management and green and blue infrastructure should be incorporated into proposals where appropriate. Current and expected flood risk from all sources should be managed in a sustainable and cost-effective way.

Retail and Leisure

7) New development should support the position of Staines at the top of the retail and leisure hierarchy within the Borough. Proposals that contribute to culture, the arts and access to the River Thames will be considered favourably.

8) Mixed-use development that has the potential to introduce new community and healthcare uses to the centre will be encouraged which increase foot-fall and contribute to the vitality and viability of the centre.

Opportunities

9) Southern Rail Access to Heathrow that includes a station at Staines, and Southern Light Rail as the Council's preferred solution, is considered essential for the town to maximise access to the airport, regardless of any expansion proposals.

10) There are opportunities to improve existing local leisure facilities and the evening economy.

11) There are opportunities for attractive riverside development and public realm enhancement that would improve the amenity value of the area and improve accessibility to and alongside the river. Improvements to the water quality of the river could be achieved by introducing additional landscaping and SuDS, which can also benefit wildlife and biodiversity. Improved access will be encouraged in order to maximise the asset that is the River Thames-side location.

12) Renewable and zero carbon energy solutions will be expected to be incorporated in all new development, including opportunities for Air Source Heat Pumps (ASHP) and district heat networks or suitable alternative.

Reasoned Justification

5.3 Staines-upon-Thames is the main town centre within Spelthorne and therefore sits at the top of the centre hierarchy in the Borough. In this role, Staines is required to support a variety of uses, including shops, offices, leisure and entertainment facilities. Through this, Staines has the opportunity to grow and develop into a thriving town that can take advantage of its close proximity to Heathrow Airport and proposed new public transport schemes are likely to enhance its connectivity further.

5.4 As well as accommodating growth, Staines also has significant character through the Staines Conservation Area and the river frontage. There is therefore an expectation that any new development which affects the setting of the Conservation Area or the river will respect and enhance this character.

5.5 The High Street anchors the town centre and has a strong market town character of fine-grain buildings of between 3 and 5 storeys. Church Street and Staines village have a strong village feel with residential and commercial properties of mainly 3 and 4 storeys and lead west towards attractive green open spaces. To the north-west and south-east of the High Street, late 20th century retail developments are much larger in scale and have significant areas of surface parking. More recent developments (such as those along London Road) are high-density contemporary mixed use of between 10 and 15 storeys. The entirety of Staines-upon-Thames town centre lies within the

Heathrow safeguarded area, in the zone that limits height to a maximum of 45m (approximately 15 storeys).

5.6 The growth of Staines will allow opportunities to improve public realm and pedestrian linkages through the town centre. This will also include opportunities to improve the river frontage and the footpath network through the Thames Path where possible. Enhancing this asset, and linkages to it, is therefore a key strand of opportunity for Staines and justifies its inclusion as part of the policy.

5.7 Mixed-use development within Staines town centre will be provided in accessible locations, providing homes close to transport hubs, to reduce the need to travel by car. Mixed-use development presents opportunities to make good use of community combined heat and power, as the different types of use spread demand for heat and power over the day, evening and night. The buildings are likely to be in close proximity and reduce the cost of developing the heat network. Leisure and retail facilities can provide a base demand to help the efficiency of the system. Taller buildings will require piling for deep foundations which may provide opportunities for ground source heat.

SP2: Ashford, Shepperton and Sunbury Cross

Strategy

1) Ashford, Shepperton and Sunbury Cross offer the potential for development opportunities to help meet identified needs. There are opportunities to maximise the efficient use of land by raising densities whilst ensuring high quality design, particularly around public transport interchanges, within the existing character. New developments will be expected to provide infrastructure improvements necessary to mitigate impacts.

Infrastructure

2) The Council will support proposals that seek to improve infrastructure to support the anticipated level of development in the centres. The Council will work with infrastructure providers to identify projects for funding. Improvements will be sought for:
   (a) Public transport and sustainable and active travel opportunities, including improvements to bus networks and access to rail stations.

   (b) Education facilities and healthcare services.

   (c) Social and community uses including open space provision in accessible locations.

   (d) Public realm to enhance connectivity for pedestrian access, encourage the use of cycling and to provide car parking opportunities. Public realm improvements should positively contribute towards enhancing the existing local character.

Retail and Main Town Centre Uses

3) The Council will seek to preserve and enhance the role and diversity of uses in Ashford, Shepperton and Sunbury Cross to strengthen the vitality and viability of each centre. Development proposals are expected to be consistent with the scale and function of each centre and will be directed to the Primary Shopping Areas as shown on the Policies Map.

Character

4) The Conservation Areas around Shepperton (shown on the Policies Map) will be preserved and enhanced, along with heritage assets. Proposals will be supported that protect and enhance the local character of the area.

Opportunities

5) Sunbury Cross offers an opportunity to encourage sustainable and active modes of travel through improvements to local bus networks and to the public realm to enhance safety and connectivity. These opportunities can be identified through Spelthorne's most up-to-date Local Cycling and Walking Infrastructure Plan (LCWIP). This will also contribute to improving air quality, particularly around Sunbury Cross roundabout.

6) Ashford offers the opportunity to enhance the local level retail and leisure offer including health and fitness facilities and children's play spaces. In addition, improvements to the public realm will enhance connectivity and present the

opportunity to provide more accessible car parking through rationalising of available land and public realm, where appropriate.

7) Shepperton would benefit from improvements to bus and rail services to improve connectivity and support active and sustainable modes of travel. Opportunities to secure these improvements will be supported by the Council

8) Renewable and zero carbon energy solutions will be expected to be incorporated in all new development, including opportunities for Air Source Heat Pumps (ASHP) and district heat networks or suitable alternative.

Definitions

5.8 Primary Shopping Area is a defined area where retail development is concentrated.

5.9 Public Transport interchanges are defined as rail stations and bus stations within the Borough and are shown on the Policies Map. For the district centres, Ashford rail station, Sunbury rail station and Shepperton rail station are relevant. Standalone bus stops are not included within the definition of public transport interchanges.

Reasoned Justification

5.10 Ashford, Shepperton and Sunbury Cross are identified in the centre hierarchy as district centres offering retail facilities to their communities but without the range of retail offer provided in Staines**.** Ensuring vitality in the centres involves bringing unused retail units back into occupation and seeking to provide a diverse range of stores. Encouraging expansion where appropriate within the Primary Shopping Areas of each centre would allow for growth in this sector.

5.11 Improvements in public realm, especially at Ashford and Sunbury Cross, will improve safety and connectivity for pedestrians. In the case of Sunbury Cross, public realm improvements will make pedestrians safer given the interaction with cars on the A308 when accessing the retail area. Opportunities to improve access across the Sunbury Cross roundabout, to improve linkages to Sunbury rail station, should also be sought as part of this public realm improvements package.

5.12 Ashford, Shepperton and Sunbury Cross each have their own mainline train station to provide connectivity into central London via Richmond and Kingston. This accessibility makes the three district centres attractive places to live. Providing housing around transport interchanges such as rail stations accords with the NPPF in making effective use of land. Whilst this approach would lead to higher densities, it is also important to ensure that the quality of design and standards are maintained and all necessary infrastructure is secured to mitigate the impacts of new development

5.13 Each of the three centres have their opportunities where improvements could be sought and these have been identified within the policy. In addition to these, the three centres have more general infrastructure needs which will likely increase should growth occur and place greater pressures on existing services. This issue has been highlighted as a key component of delivering growth in the centres. Infrastructure improvements will need to be in an accessible location to cater for all sections of the local community and ensure that this can be fully utilised.

Key Evidence

- Retail and Town Centre Study (2018)
- Spelthorne Annual Retail Surveys (summarised in the AMR (available online Authority Monitoring Report - Spelthorne Borough Council)
- Open Space Assessment (2019)
- Playing Pitch Strategy (2019)

SP3: Stanwell and Stanwell Moor

Strategy

1) The Council will support the communities of Stanwell and Stanwell Moor and will seek to secure improved economic, social and environmental benefits.

Infrastructure

2) The Council will work with infrastructure providers, developers and other key stakeholders to identify long term sources of funding and secure proposals for new infrastructure which offer sustainable transport links including active travel and public transport to improve access into and out of Heathrow Airport and other employment areas.
3) The Council will support the provision of new social facilities including education and healthcare services as well as new leisure facilities to meet identified local needs.
4) The Council will support proposals which enhance the function and setting of the local watercourses and river corridors and the rights of way network throughout the area.

Retail

5) The Council will protect the role that local facilities play in providing for the needs of the communities in Stanwell and Stanwell Moor. Development proposals for Use Class E, particularly retail, will be supported, where the scale is considered to complement the needs of the communities and the local character.

Character

6) The Stanwell Conservation Area (shown on the Policies Map) will be conserved and enhanced, along with heritage assets. Proposals will be supported that protect and enhance the local character of the area.
7) The Council will work with Surrey County Council to ensure that the areas of current and former mineral sites and are fully restored or enhanced as to the agreed restoration plans for the benefit of the local community.

Opportunities

8) The Council will support opportunities for new and enhanced open spaces within Stanwell and Stanwell Moor and will encourage improved linkages as part of the wider green infrastructure network to promote walking and cycling, including improvements in cycling routes to Heathrow.
9) Opportunities to improve access to Staines Moor will also be pursued, where these do not impact upon the Moor. Additionally, improvements to connectivity to the Colne Valley Regional Park will also be sought.
10) The Council will support opportunities for new housing provision where it is sustainably located, makes an efficient use of land and complements the local character.

11) Renewable and zero carbon energy solutions will be expected to be incorporated in all new development, including opportunities for Air Source Heat Pumps (ASHP) and district heat networks or suitable alternative

Reasoned Justification

5.14 Stanwell and Stanwell Moor are communities to the north of the Borough which are less well connected to the rest of Spelthorne. Stanwell is more developed to the south and links with the northern-most part of Ashford, whilst Stanwell Moor has a more distinct, rural character. Both Stanwell and Stanwell Moor are heavily impacted by Heathrow Airport. There is therefore a requirement for these communities to benefit from new and improved facilities and infrastructure where this can be secured.

5.15 Clare Road in Stanwell is identified as an important shopping parade which supports its local community. There is therefore a need to ensure that the vitality and viability of this parade is maintained and enhanced where appropriate. Stanwell Moor has a small area of retail provided on Horton Road, the offer for which is limited and further improvements could be sought. Stanwell and Stanwell Moor would benefit from improved local connectivity with other parts of the Borough and with Heathrow Airport. These improvements would focus around enhanced public transport and opportunities to encourage sustainable and active travel through cycle ways and improved pedestrian linkages.

5.16 The proximity of Stanwell Moor to Staines Moor provides opportunities to enhance access to this important site. As part of this, opportunities to maintain and enhance linkages to the wider Colne Valley Regional Park, will be sought so as to encourage residents to use these key natural spaces to improve health and wellbeing.

Key Evidence

- Retail and Town Centre Study (2018)
- Spelthorne Annual Retail Surveys (summarised in the AMR (available online Authority Monitoring Report - Spelthorne Borough Council)
- Open Space Assessment (2019)
- Playing Pitch Strategy (2019)

5.17 Full Green Belt policy can be found in the National Planning Policy Framework and this policy is not intended to repeat it, but to provide local detail on specific policy matters.

SP4: Green Belt

1) The Green Belt boundary is defined on the Policies Map. In order to uphold the fundamental aims of the Green Belt to prevent urban sprawl and to keep land within its designation permanently open, inappropriate development should not be approved except in very special circumstances. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm is clearly outweighed by other considerations.

Replacement and Extension of Buildings in the Green Belt

2) The Council will permit the replacement of a building in the Green Belt provided the new building:

- would be in the same use[17]
- is not materially larger than the one it replaces;
- is sited on or close to the position of the existing building, unless an alternative position would benefit the openness of the Green Belt; and
- does not have a materially greater impact on the openness of the Green Belt.

3) The Council will permit the extension and alteration to a building in the Green Belt provided the addition:

- is not disproportionate, over and above the size of the original building; and
- does not have a materially greater impact on the openness of the Green Belt.

Reasoned Justification

5.18 The Metropolitan Green Belt plays a key role in Spelthorne to protect its character by preventing the immediate outward sprawl of London, to ensure settlements do not merge into each other, encouraging development of previously developed land and safeguarding the countryside from encroachment. In developing this Local Plan, a two-stage review of the Green Belt was undertaken to assess the extent to which land in the Borough fulfils these purposes. As a result, some land was considered not to perform these functions to

[17] Re-use of buildings in the Green Belt are not inappropriate under the NPPF provided they preserve its openness, do not conflict with the purposes of including land within it and are of a permanent and substantial construction.

the extent that warranted retaining the Green Belt designation and the decision was made to amend the boundary to remove areas that did not perform well and should be developed for other uses instead. The current area of Green Belt following removal of those sites is shown on the Policies Map.

5.19 The original building will be determined based on its size as existing on 1 July 1948 or first built if later than this date. This is to enable the effect of cumulative development to be taken into account when a building has been extended previously. The cumulative impact of a series of small extensions can be just as great as a single large addition. The size of the plot is not relevant when considering whether a replacement building is materially larger or an extension results in disproportionate additions.

5.20 This Policy applies to dwellings within the former Plotland Areas that lie within the Green Belt. Other policies that protect the character of the riverside will be relevant to these dwellings even though the former Plotlands designation no longer applies. The removal of the designation is a key change to this Local Plan. It was considered that the application of policies on Plotland Areas was inconsistent across the local authorities that have or had the designation, as some applied it in addition to Green Belt policy and some applied it instead of Green Belt policy. Spelthorne previously applied the policy in addition to Green Belt policy and set out design based criteria to protect the distinctive character of the river and is not strictly relevant to Green Belt, which can be covered instead by design policies for riverside development.

5.21 Proposals within the Green Belt will also be expected to comply with all other Local Plan policies when taken as a whole, particularly those that cover design, amenity, landscape, biodiversity and flooding.

Key Evidence

- Green Belt Assessment Stage 1, 2017
- Green Belt Assessment Stage 2, 2019
- Green Belt Assessment Stage 3, 20

SP5: Colne Valley Regional Park

1) The extent of the Colne Valley Regional Park (CVRP) within the Borough is defined on the Policies Map. As a member of the CVRP, the Council will seek to maintain the character and landscape of the Park and promote its enhancement and benefits.

2) The Council will expect proposals for development within the Colne Valley Park to make a positive and sustainable contribution towards implementing the objectives of the Park. The Council will support, in principle, development within the Park where it can be demonstrated that it will:

- maintain and enhance the landscape and historic environment of the Park and its overall amenity value;
- contribute to the objectives of the Park;
- conserve and enhance biodiversity within the Park through the protection and management of its species, habitats and geological features;
- provide opportunities for countryside recreation and ensure that facilities are accessible to all;
- contribute to a vibrant and sustainable rural economy within the Park;
- encourage community participation, including volunteering and environmental education, and promote the health and social well-being through high quality green space and its contribution to the wider green infrastructure network and;
- carry out appropriate surveys, should development within the Park amount to changes to biodiversity areas or designations and recreational facilities.

Reasoned Justification

5.22 The Colne Valley Regional Park covers over 10,000 hectares to the west of London. It forms a narrow corridor of countryside, much of it within the Green Belt, stretching from Rickmansworth in the north to Staines and Wraysbury in the South where the River Colne joins the Thames. It is some 14 miles long and 3 miles wide at its widest point. It straddles a number of local authority boundaries. The area within Spelthorne covers some 1,000 hectares and comprises three major reservoirs, the areas of Staines Moor, Hithermoor and the settlement of Stanwell Moor. In addition, the River Colne SNCI and King George VI SSSI are key features and located within the Park.

5.23 The Colne Valley Regional Park was conceived in the 1960's with the broad aims of providing for informal recreation in a countryside setting. The original objectives remain just as valid today, although they have been updated, modified and extended over the last 50 years:

1. To maintain and enhance the landscape, historic environment and waterscape of the Park in terms of their scenic and conservation value and their overall amenity.

2. To resist urbanisation of the Colne Valley Park and to safeguard existing areas of countryside from inappropriate development.

3. To conserve the biodiversity resources of the Park through the protection and management of its diverse plant and animal species, habitats and geological features.

4. To provide opportunities for countryside recreation including appropriate accessible facilities.

5. To achieve a vibrant and sustainable rural economy, including farming and forestry, underpinning the value of the countryside.

6. To encourage community participation including volunteering and environmental education and promote the benefits of health and social well-being afforded by access to high quality green space.

5.24 The Council supports the objectives of the Park and will seek to ensure that land within it is kept open and available for informal recreation where possible and that any proposals for development make a positive contribution to the setting of the Park, its landscape and recreational potential.

5.25 The CVRP produced the Colne and Crane Green Infrastructure Strategy in 2019 which highlighted numerous challenges facing the Park. These challenges include significant development pressure and the need to enhance green infrastructure assets. Improving the network of green infrastructure could benefit Spelthorne by enhancing linkages to the CVRP and wider areas within the Borough. By supporting the approach by CVRP, this presents the Council with the opportunity to enhance beneficial use of the Green Belt linked with the Park, where appropriate.

Key Evidence

- Current facilities at the Colne Valley Regional Park, information found online Home - Colne Valley (colnevalleypark.org.uk)
- Colne Valley Regional Park: Green Infrastructure Strategy – Colne and Crane Valleys (2019) Green Infrastructure Strategy - Colne and Crane Valleys - Colne Valley (colnevalleypark.org.uk)

SP6: River Thames and its Tributaries

River Thames

1) The River Thames is a strategically important and iconic feature of Spelthorne. It is an important natural and cultural asset providing leisure, ecological, environmental, landscape and economic benefits. This role will be protected and promoted. The special character and setting of the River Thames as defined on the Policies Map will be conserved and enhanced, and appropriate development proposals associated with river related activities and employment will be supported.

2) The Council supports opportunities to increase the use of the rivers for tourism and improving river-based and riverside recreation and leisure activities. All development proposals should protect and enhance the river and its setting as a valuable resource for biodiversity, wildlife and as an SNCI. Where possible and where there will be no adverse effect on the SNCI, development proposals should support infrastructure such as boatyards, moorings, jetties and safety equipment etc.

3) Proposals for riverside development and improved facilities will need to demonstrate that there will be no unacceptable impact upon navigation, biodiversity, flood risk and landscape setting.

4) Development proposals on the riverside should respect and make a positive contribution to enhance the waterside character, heritage value and setting, and provide physical and visual links with the surrounding areas (including views along the river).

5) The Council is supportive of river-related business uses (for example boat yards) and supports their continued presence in a river-side location.

6) The Council will support and promote new links across the River Thames and improvements to riverside access and towpaths which support active and sustainable travel and leisure uses of the river.

New Visitor Mooring Facilities

7) A visitor it does not harm the character, openness and views of the river, by virtue of its design and height;

- allows use for a period of less than 24 hours;
- there is no interference with the recreational use of the river, riverside and navigation;
- the proposal is of wider benefit to the community; and
- has undergone consultation with the Environment Agency and not received objection.

River Thames Scheme

8) The Council supports in principle the proposals for the wider River Thames Scheme and welcomes the proposed new footpath connection in Laleham as part of the

recreational benefits the scheme will bring. The proposed route is shown on the Policies Map.

Tributaries

9) The Rivers Ash, Colne and Wraysbury are tributaries of the River Thames and form an important part of the Borough's blue infrastructure network. Development proposals will be supported that:

(a) Ensures there is no requirement for the culverting of watercourses.

(b) Retain the natural banks.

(c) Make appropriate provision to protect, enhance, improve and maintain accessible networks of Blue Infrastructure, including through deculverting[18] and re-naturalisation of hard banks if appropriate.

(d) Provide undeveloped buffer zones of 8m minimum for main rivers and 5m minimum for other water courses. This is also applicable to culverted rivers. A scheme to provide a buffer zone will need to include a working method statement detailing how the buffer zone will be protected during construction and long-term ecological plan.

(e) Include measures to allow for the natural movement of fish within the watercourse where barriers to fish movement are present to enhance habitat connectivity.

Reasoned Justification

5.26 The River Thames forms a large part of the southern boundary of the Borough between the neighbouring Boroughs of Runnymede and Elmbridge. It is a significant local and regional amenity. The Thames is the longest river in England measuring 215 miles; it begins in the Cotswold Hills (Gloucestershire), meandering eastwards through Spelthorne before passing through the city of London and ending in the North Sea. The River Thames is regarded as a key asset of the Borough, is one of the Borough's key tourist attractions, and the Council is keen to maximise its potential. The river brings great benefits from tourism, leisure, recreation and ecological perspectives, and is also beautiful.

5.27 Policy SP6 aims to ensure that the setting of the river and its tributaries are protected and where possible enhanced. This involves protecting landscape features that contribute to the setting and protecting and enhancing views of the river. Works to main river will require a Flood Risk Activity Permit under the Environmental Permitting (England and Wales) Regulations 2016.

5.28 Particular care will be needed in assessing the visual impact of development proposals

[18] Removing a culvert may enhance local biodiversity through recolonisation by local species, can aiding fish passage and add to the visual attractions of an area whilst reducing flood risk.

in locations that form part of the setting of the river to ensure that the setting is not damaged and that new development makes a positive contribution to the riverside environment.

5.29 There is public access to much of the Thames riverside in Spelthorne, although access to the River Ash, Colne and the River Thames downstream of Shepperton Lock is more limited. Existing riverside access will be maintained and opportunities will be sought to improve access in conjunction with developments in riverside locations.

River Thames Scheme

5.30 A significant area of Spelthorne lies in the floodplains of the Thames, Colne (and related river system) and Ash. Flood defences are very limited and are on parts of the River Colne system and the River Ash. The River Thames between Egham and Teddington is one of the largest areas of undefended, developed floodplain in England. Spelthorne Borough Council is working with the Environment Agency, Surrey County Council and other partners to bring forward the River Thames Scheme[19] which seeks to address this with the aim of reducing flood risk in communities by providing additional channel capacity and improved conveyance. Alongside the channels there will be large areas of green open space, new foot and cycle paths, and improved wildlife habitats. The flood channels will also provide opportunities for fishing, boating and canoeing bringing health benefits to communities as well as opportunities for tourism, recreation and leisure. The key elements are:

- a proposed new river channel built in two sections – at Runnymede and at Spelthorne – to increase storage capacity for water from a major flood;
- improvements to existing river structures (Sunbury, Molesey and Teddington weirs);
- large areas of green open space, improved wildlife habitats and opportunities for tourism, recreation and leisure; and
- new and enhanced active travel routes for walking and cycling.

5.31 Like other boroughs, Spelthorne needs to ensure it is able to plan development that responds to the climate emergency. One of the biggest risks to the borough is flooding from the River Thames and this risk will only grow with climate change. The section of the River Thames that runs through the borough makes up one of the largest areas of un-defended flood plain in England. The River Thames Scheme is a project designed to significantly reduce the risk of flooding by creating two new river channels totalling over 8.5 miles alongside the Thames in Runnymede and Spelthorne, as well as increasing capacity at Sunbury, Molesey and Teddington weirs. These new channels will increase the capacity of the Thames through Surrey and south west London, reducing the risk of flooding to over 11,000 homes and 1,600 businesses. Alongside the channels there will be large areas of green open space, new foot and cycle paths, and habitat creation. The flood channels will also provide opportunities for fishing, boating and canoeing bringing health benefits to communities as well as opportunities for tourism, recreation and leisure.

5.32 The proposed Spelthorne channel is 3.2km in length. It starts at Laleham and ends at Weybridge. The channel flows through four lakes and crosses five roads. This area includes increasing capacity on stretch of the Desborough Cut. At Sunbury weir there will be three extra gates built on the lock island.

[19] www.riverthamesscheme.org.uk

5.33 The large scale of the project means it is to be treated as a Nationally Significant Infrastructure Project (NSIP) and requires a type of consent known as 'development consent order' (DCO). The DCO must be granted before full funding is approved and construction can begin.

5.34 Development along the route of the River Thames Scheme should, where appropriate, seek to facilitate the Scheme. Flood Risk Assessments should sufficiently consider how the River Thames Scheme may be impacted by the proposals and also identify opportunities to facilitate its implementation.

Key Evidence

- Water Framework Directive (2000) (available online at: Water Framework Directive (europa.eu))
- Environment Act 2021 (available online at: https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted)

SP7: Heathrow Airport

A Possible Expansion at Heathrow

1) The Council will support a future expansion at Heathrow Airport if it is undertaken in a sustainable and integrated way by:
   (a) working strategically with local authorities around Heathrow Airport.
   (b) permitting development proposals outside the airport or Development Consent Order (DCO) Limits boundary[20] in the Borough for Airport Supporting Development (ASD)[21] particularly those that support economic development if they:

   - protect and enhance designated areas of existing environmental character including Sites of Nature Conservation Importance, areas of landscape value, the Borough's historic and cultural heritage (including historic buildings and Conservation Areas), habitats particularly within Biodiversity Opportunity Areas, Colne Valley Regional Park and open space of amenity and recreation value;

   - demonstrate ecological offsetting and incorporate mitigation measures to achieve at least 10% biodiversity net gain;

   - ensure safeguards are in place to mitigate air, noise, light and other pollution in the Borough; and

   - offer high-quality design of buildings and structures.

   (c) resisting inappropriate development in the Green Belt unless the harm is outweighed by very special circumstances.
   (d) supporting the implementation of a range of surface access interventions to encourage modal shift towards more sustainable forms of transport such as:

- promoting sustainable transport choices which reduce the need to travel;
- improving surface access to minimise airport related traffic (congestion) as the Borough as a whole;
- promoting initiatives such as car sharing/clubs, the use of electric vehicles, low emission cars and colleague shuttle buses from the surrounding areas and;

[20] Development Consent Order (DCO) Limits boundary describes the overall boundary of a future Heathrow Expansion project which includes land Heathrow intends to construct buildings, infrastructure and much of the extensive landscape mitigation areas, and land where Heathrow may potentially require property and other rights for landscape mitigation areas

[21] Airport Supporting Development (ASD) refers to a range of development that is related to the airport's operation, and includes uses such as airport operations, cargo, maintenance, industrial, freight forwarding, hotels and offices (Heathrow, 2019).

(e) supporting southern rail access including the promotion of the Southern Light Rail (SLR) where there is benefit to communities in the Borough and the wider strategic network.

Hazardous Development

2) The Council will refuse permission for any proposal likely to significantly increase the risks associated with any particular hazardous installation or impose conditions where necessary to avoid increased risk and;

3) Development leading to an increase in people living, working or congregating in the Public Safety Zone will be refused.

Noise from Heathrow

4) The Council will seek the support of BAA, the Government and relevant statutory authorities for the following measures:

(a) maintenance of the use of noise preferential routes;

(b) controls on flying at night that will achieve a progressive improvement in the night noise climate, including a limit on the total number of flights at night and;

(c) maintenance of existing controls on ground noise.

Development Close to Heathrow and Noise from Heathrow

5) The Council will seek to minimise the adverse impact of development close to Heathrow by:

(a) refusing new residential development where aircraft noise levels are at or exceed 66 dB LAeq; except in the case of the one-for-one replacement of dwellings and;

(b) requiring appropriate attenuation measures for development between 60 and 65 dB LAeq.

Reasoned Justification

5.35 Despite the Supreme Court's ruling in 2020 that the proposed expansion can go ahead and would not be unlawful, the future of Heathrow Airport and a possible expansion is currently uncertain due to the impacts of COVID -19. Notwithstanding the current uncertainty around the future of the project the Council remains involved with relevant work regarding Heathrow.

5.36 The policy sets out the Council's position on a possible expansion at Heathrow in the near future and reinforces the local importance the airport has on the Borough's economy. The Council will support a future expansion (in principle) as it recognises the potential economic benefits and opportunities that an expanded airport could bring to Spelthorne, the wider Southeast and the UK as a whole. However, its support will be entirely dependent on Heathrow Airport Limited (HAL) making sure

that the proposed scheme comprehensively and effectively mitigates the impacts it will have on our communities, businesses, services and environment.

5.37 The main objective of this policy is for the Council to ensure that a future expansion at Heathrow Airport secures and provides the best possible outcomes for its residents and businesses, and in particular those most directly affected in the Stanwell Moor and Stanwell communities.

5.38 Heathrow Airport, the UK's main and busiest airport lies immediately north of the Borough of Spelthorne where there is a concentration of airport supporting facilities (related developments and activities), including freight forwarding services. The Airport is an important contributor to the local economy. Before the pandemic, 5,800 of Spelthorne's residents were in Heathrow related employment and around 45% of these residents lived in Stanwell and Ashford[22]. Pre pandemic, Heathrow employed 10.6% of Spelthorne's workforce but as the Airport has been severely impacted by the pandemic, job losses in Spelthorne connected to Heathrow in 2021 is expected to be around 1,500. This suggests that there should be focus on recovery activities to support residents in the Borough (ibid).

5.39 Due to the Borough's close proximity to the airport, it experiences air and noise pollution and other environmental impacts. Pre pandemic over 92% of Heathrow employees who live in the Borough reach the airport by car rather than public transport which highlights poor connectivity. Undoubtedly the Borough is also affected by activities related to the operation of the airport and its associated businesses, such as logistics and distribution, which impact on air quality, noise, the efficiency of the local and strategic road network.

5.40 Given the economic benefits and opportunities Heathrow Airport brings to Spelthorne, the Council will work in partnership with HAL and other service providers to ensure the safe and efficient operation of the airport and seek to avoid and mitigate any potential adverse environmental impacts on the Borough and its surrounding areas.

5.41 Development proposals that would support the operation of an expanded airport in the future would have to offer the highest quality design of buildings and structures. The Council whilst seeking to secure economic and environmental benefits from specific Airport Supporting Development (ASD) proposals, will require such proposals to minimise or mitigate any adverse impacts on the wider economy.

5.42 Development involving hazardous substances or development in the vicinity of hazardous installations seeks to ensure that public safety is maintained. In applying the policy account will be taken of advice from the Health and Safety Executive. It also identifies the importance of tight controls on development within the Public Safety Zone (PSZ) (as defined by the Civil Aviation Authority) at the west end of the southern runway at Heathrow where development involving an increase in number of people living, working or otherwise congregating in the zone will be refused. The PSZ is shown on the Proposals Map.

Key Evidence

[22] Appendix 1 – Covid impact on Business report (2021) Spelthorne Borough Council. Available from https://democracy.spelthorne.gov.uk/documents/s35002/Appendix%201%20-%20Covid%20impact%20on%20Business%20report%20May%202021%20v2.pdf

- Heathrow Strategic Planning Group (2020): Economic Development Vision and Action Plan
- Heathrow Strategic Planning Group (2020): Joint Spatial Planning Framework
- Civil Aviation Authority (2019): Heathrow Airport 2018 Summer Noise Contours and Noise Action Plan Contours
- Airports National Policy Statement: new runway capacity and infrastructure at airports in the south-east of England (2018)

6. Housing

6.1 Different groups within our community, including families, older people, younger people, people with disabilities requiring more specialist accommodation and the Gypsy and Traveller community have differing accommodation needs. The policies within the Plan set out how a wide variety of high-quality homes, of all tenures, types and sizes, which meet the needs of our residents will be delivered.

6.2 The Borough's accessible location, together with the diverse natural environment and prospering economy means the Borough offers a good quality of life. While this has many positive impacts, the desirability of Spelthorne as a place to live does have a negative impact on affordability. The policies within the Plan set out ambitious targets for meeting the needs of our residents who are not able to afford adequate housing on the open market.

H1: Homes for All

Housing Need

1) The Council will make provision for at least an additional 631[23] homes per annum in Spelthorne Borough over the plan period.

Housing Mix and Standards

2) New residential development is required to deliver a wide choice of homes to meet a range of accommodation needs. New development should provide a mix of housing tenures, types and sizes appropriate to the size, characteristics and location.

3) Development proposals will be expected to contribute to meeting identified housing needs by having regard to the housing type and size mix as set out in the Strategic Housing Market Assessment[24] or any similar evidence for market and affordable units.

4) All new residential development across all tenures (under Use Class C3) will be expected to meet with the minimum space standards as set out by the Ministry of Housing, Communities and Local Government (MHCLG). Houses of Multiple Occupation (HMOs) will be expected to comply with HMO space standards defined by the Council.

5) The Council will permit residential development provided that it does not result in a net loss of units (C2 or C3[25] use class accommodation or gypsies, travellers and travelling showpeople pitches or plots) unless the loss can be justified on other policy grounds.

6) The Council supports development proposals which take opportunities to facilitate healthy lifestyles and include measures to boost the sustainability of the location.

[23] As calculated using the standard method for assessing housing need, at 2019 with a base date of 2024. The Council will review the local housing need figure as and when appropriate, guided by the Government's approach to assessing housing need

[24] Or any future updated evidence produced or commission by the Council on housing need or Government Guidance

[25] Definitions of C2 and C3 use classes are available from the Planning Portal

7) The Council is supportive of Build to Rent housing, where a need for this type of accommodation can be demonstrated. Where Build to Rent housing is proposed, the proportion of Affordable Housing provision should be as set out in national policy (20%) until such a time that the Council sets its own benchmark level supported by up-to-date evidence, plans or strategies.

Accessible Homes

8) All new homes must be designed and constructed in a way that enables them to be adaptable, so they can meet the changing needs of their occupants over their lifetime, Planning permission will be granted for new dwellings subject to the following:

   (a) All new build dwellings will, as a minimum, be constructed in accordance with the requirements of Building Regulations Approved Document M requirement M4 (2) Category 2: Accessible and adaptable dwellings and any subsequent updates, unless it can be demonstrated that it is unfeasible to do so.

   (b) Unless it can be demonstrated that it is unfeasible to do so, the Borough Council will require a minimum of 10% of new dwellings on major housing developments to accord with M4(3) Category 3: Wheelchair user dwellings.

9) Exemptions will only be considered where the applicant can robustly demonstrate that compliance would significantly harm the financial viability of the scheme, or where it is not practical to do so given the flood risk. All residential proposals should be accompanied by a separate document setting out how proposals (including each dwelling type) accord with each of the standards as detailed in Building Regulations. Where exemptions are sought on practicality or viability grounds, the minimum number of units necessary will be exempted from the requirements i.e. If only 1 out of 3 wheelchair accessible dwellings can be provided, then the 1 still applies.

Specialist Accommodation

10) The provision of well-designed specialist forms of accommodation, including sheltered housing, care homes and other appropriate forms of accommodation for the elderly and those with particular needs, will be permitted provided that the development:

   (a) Meets demonstrable established local community need; and

   (b) Is in a sustainable location, with access to appropriate services and facilities where these are not provided on site. This includes public transport, shops, local services and community facilities.

11) Where specialist accommodation falls within a relevant use class[26], an appropriate proportion of affordable housing in accordance with Policy H2 will be required, with the mix of tenures negotiated by the Council having regard to advice from appropriate specialist bodies.

12) The Council encourages mixed development that include an element of specialist accommodation (including sheltered housing, supported housing, extra care housing and residential/nursing care homes) on larger schemes where the character and size

[26] As set out in Policy H2 (g).

of the site allows.

Self and Custom Build Housing

- The Council will support Self and Custom Build developments for residential accommodation in appropriate locations, in the interests of supporting high quality homes which meet the identified needs of the Borough. In considering major development applications, the Council will consider the currently applicable Self Build Register and whether provision should be included within the development.

- The delivery of housing on these plots will:

    - In terms of the mix of plots, be negotiated by the Council as informed by the Council's self-build and custom housebuilding register;

    - Be required to be completed within 3 years of a custom builder purchasing the plot;

    - Where plots have been made available and marketed appropriately for

Definitions

6.3 Specialist Housing: Housing that has been specifically designed to meet the needs of people with particular requirements (including sheltered housing, supported housing, extra care housing and residential/nursing care homes). It can refer to housing that has been purpose designed or designated for a particular client group to assist tenants to live independently.

6.4 Self-Build and Custom Housebuilding: The building or completion by a) individuals, b) associations of individuals, or c) persons working with or for individuals, of houses to be occupied as homes by those individuals; but does not include the building of a house on a plot acquired from a person who builds the house wholly or mainly to plans or specifications decided or offered by that person.

6.5 M4(2) Housing: Accessible and adaptable dwellings as set out in Building Regulations. Where a new dwelling makes reasonable provision for most people to access the dwelling and incorporates features that make it potentially suitable for a wide range of occupants, including older people, those with reduced mobility and some wheelchair users.

6.6 M4(3) Housing: Wheelchair user adaptable dwellings as set out in Building Regulations. Where a new dwelling makes reasonable provision, either at completion or at a point following completion, for a wheelchair user to live in the dwelling and use any associated private outdoor space, parking and communal facilities that may be provided for the use of the occupants.

Reasoned Justification

6.7 The Council wants to deliver a wide variety of high quality homes that provide all tenures, types and sizes of housing to meet the needs of the community. The Council will seek to enable housing delivery which meets the needs of different

groups including families, older people, younger people, people with disabilities, people requiring more specialist accommodation, the Gypsy and Traveller community and Travelling Showpeople community. The Plan will also seek to make provision for self-build/custom build projects and starter homes.

Housing Need

6.8 In September 2017 the Government published a consultation document 'Planning for the right homes in the right places'. This put forward a standard approach to assessing local housing need, in the interests of simplicity, speed and transparency. It is based on a formula that uses affordability ratios and average household growth over a 10 year period, with the current year being the first year from household projections. Planning Practice Guidance confirms that local authorities should use the 2014-based household projections to set the baseline. In the long term the Government proposes to review the formula with a view to establishing a new method.

6.9 Using the standardised methodology, Spelthorne has a need of 631 new dwellings per annum. The Government makes clear that local planning authorities should be able to rely on the evidence used to justify their local housing need for a period of two years from the date they submit their Plan.

Housing Mix and Size Requirements

6.10 The need for different types, sizes and tenures of homes required has been assessed through the Strategic Housing Market Assessment (SHMA) 2015 and SHMA update 2019. This includes accommodation needs of families, older people, people with disabilities, service families, people wishing to build their own homes and students. The Gypsy and Traveller Accommodation Assessment has assessed the need for traveller accommodation. The Council will have regard to the findings of the latest SHMA when determining the right balance of homes in new development and would encourage applicants to discuss housing mix with the Council's Planning and Housing Officers.

6.11 The SHMA 2015 and SHMA update 2019 indicate that:

- There is a need for 35-40% one bedroom, 25-30% two bedroom, 25-30% three bedroom and 5-10% four bedroom affordable rented ownership housing.
- There is a need for 15-25% one bedroom, 40-45% two bedroom, 25-35% three bedroom and 5-10% four bedroom affordable home ownership housing.
- There is a need for 0-5% one bedroom, 20-25% two bedroom, 50-55% three bedroom and 20-25% four bedroom market housing.
- There is an ageing population in Spelthorne with the number of residents aged over 65 projected to increase by 41.4% up to 2035.
- With an ageing population the number of people with disabilities is expected to increase substantially in the future.
- Need for 37 registered care bed spaces per annum.
- Need for 93 specialist accommodation for older people per annum.
- There are approximately 12,781 households with dependent children.
- There are approximately 4,433 households with non-dependent children.

6.12 A flexible housing stock will help meet the wide range of accommodation needs so the Council will expect all new homes to be flexible, accessible, adaptable and age friendly. New homes should support the changing needs of individuals and families at different stages of life. Housing developments should help to meet the needs of all members of the community and in turn reduce inequalities. National Planning Policy requires local planning authorities to plan for a mix of housing, taking account of local demographic trends, market trends and the needs of different groups of the community. Local planning authorities should identify the size, type, tenure and range of housing that is required in their area.

6.13 The NPPF emphasises the importance of health and wellbeing and that LPAs should take account of current and future needs of the local population and identify the relevant barriers to improving health and well-being. Housing should be sustainably located with access to local services and transport links. Development proposals should facilitate healthy lifestyles and should help to achieve sustainable development and sustainable mixed communities.

6.14 The minimum size for a bedroom is defined by the Housing Act 1985. The Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006 require kitchens, bathrooms and WCs to be of adequate size. If there are no communal living areas, bedrooms need to be larger.

6.15 Build to rent involves the construction of dwellings specifically for the rental market, rather than the more traditional route in which developers build dwellings which they then sell, either to householders or to landlords. Build to rent schemes require long-term professional management to deal with the maintenance of the building and day-to-day issues. It provides an opportunity to boost the rate of overall housing delivery, as it does not compete directly with traditional housing which are built for sale. Build to rent housing can offer a range of benefits, making it a more attractive product than traditional private rented sector housing to developers, tenants, councils and stakeholders, as this sector has grown significantly over recent years while home ownership levels have declined. The Council supports the provision of Built to Rent homes where these are well-designed, where evidence is provided that high standards of management will be put in place, and where the benefits of such housing are balanced against the level of affordable housing provision. The need for Build to Rent housing should be demonstrated if this type of development is proposed. Any Build to Rent housing provision should be delivered in accordance with the Council's latest guidance, policies and evidence.

6.16 Affordable housing on build to rent schemes should be provided by default in the form of affordable private rent, a class of affordable housing specifically designed for build to rent. Should the Council produce a supplementary planning document on affordable housing, this should be referred to on the type of affordable housing provision required within build to rent schemes.

Accessible Homes

6.17 The NPPF requires local planning authorities to have a clear understanding of housing needs in their area, including those for people with specific housing needs. Part M4(3) relates to wheelchair accessible dwellings; Part M4(3)(2)(a) relates to dwellings which can be adapted for wheelchair users in the future and M4(3)(2)(b)

relates to dwellings which are built to be accessible to wheelchair users.

6.18 The intention of this approach will be to maximise the flexibility of new housing to accommodate a wider spectrum of housing needs. This will support the housing needs of older people but also those with specialist needs such as those who are disabled and wheelchair users, leading to positive impacts on health and well-being. Wheelchair accessible provision will be expected to be provided from the time the dwelling is ready for habitation to ensure homes contain required features and standards for residents without delay or expense.

6.19 The National Building Regulations include specific nationally agreed construction standards (the M4(2) standard) which would deliver accessible and adaptable homes. However, as a national standard they are optional and depend partly on the viability of this aspect when considered with other requirements of the Local Plan. The Borough Council is therefore requiring that all dwellings must meet the M4(2) standard. Homes built to this standard are more flexible and readily adaptable as people's needs change. They are suitable not just for the elderly but also for families with pushchair needs, or those with a temporary or permanent disability or health issue.

6.20 Where the specific requirements of Building Regulations may not be achievable, an element of flexibility is recognised as being required in the delivery of these standards. This may be due to, site specific challenges around topography, flood risk and/or the relationship to design. It is acknowledged that a significant proportion of the Borough is at risk to flooding, and that this could be a constraint to achieving this. Where developers demonstrate that the M4(2) or M4(3) requirements are not feasible to be delivered on viability grounds exemptions will be on a case-by-case basis on the clear evidence submitted at planning application stage, e.g. the topography of the site makes provision as a whole not feasible and impacts development viability significantly. Applicants will be expected to consider all other reasonable options for Accessible Home provision, for example ground floor provision or ramped access, prior to demonstrating an exemption is required.

Specialist Accommodation

6.21 Some of the community require accommodation that caters for their specific needs. This is often for more vulnerable members of our society, such as the frail, elderly or those needing specialist social support, who would benefit from on-site support. To create inclusive communities, this type of accommodation should be located in accessible areas with links to public transport and local facilities. The Council will work with specialist providers and bodies, such as Surrey County Council, to identify and secure provision of suitable sites for specialist housing.

6.22 The Council is aware of companies and organisations specialising in the provision of innovative, well designed residential units which would not be compliant with the space standards. Whilst such units are smaller than ideally would be required, it is acknowledged that such products are designed to offer high quality living spaces to meet specific needs and demands.

6.23 To deliver sustainable communities means to support the needs of the current population and any future populations. Paragraph 60 of the NPPF states that the needs of groups with specific housing requirements should be addressed. Paragraph 62 continues: within this context, the type of housing needed for different groups in the community should be assessed and reflected in planning policies including, but

not limited to older people, and people with disabilities. Paragraph 92 of the NPPF states that planning policies should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users and do not undermine the quality of life or community cohesion and resilience.

Self and Custom Build Housing

6.24 Self-Build or Custom-Build is defined through the National Planning Policy Framework as housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. It is seen to support the individual self-builder, or community group for the delivery of low cost sustainable housing on small scale infill or windfall sites, or as part of large-scale planned development, and will help in the delivery of a wide choice of high quality homes. Under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building (which may or may not be meeting affordable housing need). They are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand.

Key Evidence

- Strategic Housing Market Assessment (2015) and SHMA update (2019)
- Gypsy and Traveller Accommodation Assessment (2018)
- Strategic Land Availability Assessment (2018 & 2019)
- Spelthorne Self and Custom Build Register

H2: Affordable Housing

1) The Council will require at least 30% affordable housing units on all schemes of 10 units (net) or more. Greenfield sites will be expected to deliver at least 50% affordable housing. The minimum amount of affordable housing to be delivered should be calculated based on the net total amount of provided dwellings.

2) Planning permission will be granted provided that satisfactory arrangements have been made to secure affordable housing as determined by the following principles:

    (a) The sizes, types and tenure of homes provided will be determined on the basis of local needs as identified in having regard to the Strategic Housing Market Assessment[27].

    (b) Developments will be expected to be policy compliant in providing affordable housing. It is for applicants to demonstrate whether particular circumstances justify the need for viability assessment at the application stage. Where applicants demonstrate that the full amount of affordable housing cannot be delivered the Council will employ a sequential approach to provision:

        i) Where on-site provision is not viable, affordable housing will need to be provided off-site[28]. This is expected to enable the same amount of additional affordable housing as would have been delivered on-site.

        ii) Where viability evidence demonstrates that the full amount of affordable housing cannot be delivered the Council will negotiate a level of on-site affordable housing that can be delivered taking into account the mix of unit size, type and tenure, in addition to a financial contribution. If this cannot be accommodated on-site then the Council will seek a suitable level of off-site provision in addition to a payment in lieu.

        iii) The Council will only accept a financial contribution in lieu of affordable housing provision where it can be satisfactorily demonstrated that on-site or off-site provision is neither feasible nor viable.

    (c) The Council will have regard to the whole development site in determining the appropriate level of affordable housing provision on-site. This includes where an applicant has sub-divided, fragmented or phased a site or it is not being developed to its full potential so as to fall under the affordable housing threshold. The affordable housing requirement will need to reflect that which would be provided if the whole site were to come forward as a single scheme.

    (d) The tenure split should be informed by the most up to date Council evidence. The tenure and number of bedrooms of the affordable homes provided on each qualifying site must contribute towards meeting the mix of affordable housing needs identified in the Strategic Housing Market Assessment[29]. This currently includes a tenure split of 75% affordable/social

[27] or subsequent affordable housing needs evidence (as previous) commissions or produced by the council. Where available, wider sources relating to affordable housing need may also be considered to understand needs more local to a development proposal.
[28] Site suitability will be dependent upon compliance with policies in the Local Plan.
[29] or subsequent affordable housing needs evidence (as previous) commissions or produced by the council

rent, with 25% First Homes as per national guidance[30] . A minimum of 10% of the homes provided on each site must be available for affordable home ownership, except where an exemption applies in the NPPF.

(e) Where Build to Rent housing is proposed, the proportion of Affordable Housing provision should be as set out in the national policy (20%) until such a time that the Council sets its own benchmark level supported by any up-to-date evidence, plans or strategies.

(f) Where provided within a market housing scheme, affordable housing will be well integrated with and appropriately designed to complement the market housing. Equal access to facilities and amenities (such as open spaces and play facilities) will be required for all groups of the community living within the development.

(g) The requirement to provide affordable housing will apply to all residential development falling under Use Class C2, C3 and C4, or any subsequent amendments to the Use Classes Order, with the exception of Gypsy & Traveller Pitches or Travelling Showman Plots.

(h) Viability Review mechanisms should be applied to all viability tested applications at early and late stages in the development process (and mid-term reviews in the case of longer phased schemes) to ensure that affordable housing delivery is maximised as a result of any future improvement in viability.

Definitions

6.25 Affordable housing is housing provided to those that are unable to meet their housing needs through the private sector. Government policy as set out in the NPPF defines affordable housing as affordable housing for rent, starter homes, discounted market sales housing, and other affordable routes to home ownership[31]. To be affordable, the cost of housing must be low enough for eligible households to afford based on local incomes and house prices.

6.26 The Affordable Housing definition was amended to include First Homes in May 2021. First Homes are a specific kind of discounted market sale housing and should be considered to meet the definition of 'affordable housing' for planning purposes. Specifically, First Homes are discounted market sale units which: a) must be discounted by a minimum of 30% against the market value; b) are sold to a person or persons meeting the First Homes eligibility criteria (see below); c) on their first sale, will have a restriction registered on the title at HM Land Registry to ensure this discount (as a percentage of current market value) and certain other restrictions are

[30] First Homes PG: Reference ID: 70-001-20210524
[31] NPPF 2021, Annex 2: Glossary, 'Affordable Housing': https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

passed on at each subsequent title transfer; and, d) after the discount has been applied, the first sale must be at a price no higher than £250,000 (or £420,000 in Greater London). First Homes are the government's preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations. PPG 24 May 2021 Paragraph: 001 Reference ID: 70-001-20210524

Reasoned Justification

6.27 Spelthorne is a well-located Borough, situated immediately to the south of Heathrow Airport and adjacent to west London. The Borough offers a good quality of life with strong transport links to London. Whilst this has many positive impacts, the desirability of the location does mean that affordability is negatively affected.

6.28 The NPPF states that local authorities should assess the size, type and tenure of housing needed for different groups in the community, including those who require affordable housing, and should reflect this in policy. The importance of housing delivery is a central objective of the Local Plan since housing costs in the Borough and neighbouring areas, for purchase and for rent, are generally very high. The provision of affordable housing is necessary to ensure that housing is available to local people in priority housing need who are unable to afford adequate housing on the open market.

6.29 There is significant pressure on the affordability of housing in the Borough with median house prices being 12.66 times median workplace-based annual earnings[32].

6.30 The SHMA update 2019 indicates that there is a need for 459 affordable homes in the Borough per annum over the plan period. While the affordable housing need identified in the SHMA is a considerable percentage of the overall housing need, it is not a like for like comparison and does not directly correlate, therefore it is recommended the Council seek as much affordable housing need as is viably possible. Consideration will be given to the latest affordable housing evidence and the Council will have due regard for the priority needs of the Borough, as set out in the Housing Register maintained by the Council.

6.31 The objective of this policy is therefore to provide a deliverable framework within which affordable housing can be secured from new development in the Borough in accordance with national planning policy and responding to local identified needs. It will help the Borough to bridge the gap between the supply of affordable housing and the identified housing need.

6.32 This arrangement will also contribute towards the creation of sustainable, inclusive and mixed communities and a wide choice of housing on new development sites. Developments that include an element of affordable housing will need to ensure that all groups of the community are given equal access to new or improved facilities and amenities. This includes, but is not limited to, playgrounds, open space or community infrastructure.

6.33 Given the level of local housing need, the Council will seek 30% of housing on qualifying sites to be affordable either by means of on-site provision, off-site provision or by a financial contribution and to be delivered as part of a mix of housing types and tenures as set out in Policy H1. This will ensure that the required housing mix is

[32] ONS, 2022. House price to workplace-based earnings ratio 2021.

reflected across the whole development scheme as far as possible. Greenfield sites (including those formerly designated as Green Belt and released through the Local Plan) will be expected to deliver at least 50% affordable housing. This requirement is based on the Spelthorne Viability Assessment evidence which confirms the feasibility of providing a higher level of affordable housing on greenfield sites.

6.34 National policy and guidance set out that the role for viability assessment is primarily at the plan making stage. Policies should be realistic and for affordable housing, required levels should be set as to take account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision-making stage. Given the viability assessment work undertaken at the plan making stage, all development will be expected to be policy compliant. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.

6.35 If the Council determines that the full on-site affordable housing delivery cannot be made at the time of the decision, the Council will require a review mechanism by way of a planning obligation, to assess if circumstances have improved to increase the provision to the full policy compliant amount. This is more likely to be appropriate on larger or phased developments.

6.36 In instances where development viability is an issue, developers will need to submit sufficiently detailed viability evidence which will be reviewed by the Council and a third party[33]. To allow this analysis to take place in an open and transparent manner a viability report, completed using a recognised toolkit[34], should be provided as part of pre-application discussions or the application submission with the data and information available in an open book format. The assessment should clearly outline the maximum number of affordable dwellings which can be achieved on site. Costs associated with the assessment and third-party review should be met by the developer.

6.37 The Council aims to secure the delivery of affordable housing on-site or where it can be demonstrated that it is not viable or feasible to provide any affordable housing on-site, the Council will consider accepting off-site provision and/or financial contributions in lieu of on-site provision.

6.38 Given the viability work in preparation of the Local Plan, it is considered that the 30% affordable housing contribution and tenure splits in Policy H2 are viable and realistic in most development locations in the Borough. It is, however, recognised that there may be sites where on-site provision would not be viable or would be impractical (due to its size or location), therefore financial contributions in lieu may be accepted. Any relaxation in the provision of affordable housing must be the minimum to make the scheme viable. The applicant will be expected to provide a viable amount of affordable housing on-site with the rest provided via financial contribution. This payment is expected to be of broadly equivalent value relative to on-site provision.

6.39 The National Planning Policy Framework states that affordable housing on build to rent schemes should be provided by default in the form of affordable private rent, a class of affordable housing specifically designed for build to rent. Affordable private

[33] Planning Practice Guidance Paragraph: 009, Reference ID: 10-009-20190509

[34] A recognised toolkit such as HCA Developers Appraisal Toolkit or the Communities Agency Economic Appraisal Toolkit. https://www.gov.uk/government/publications/development-appraisal-tool

rent and private market rent units within a development should be managed collectively by a single build to rent landlord. The benchmark for the level of affordable private rent homes to be provided should be in line with national policy and guidance until such a time that the Council sets its own benchmark level based on local evidence, strategies and guidance.

6.40 Any claims that a site cannot be developed viably with an affordable housing contribution must be justified with clear and robust evidence which stands up to scrutiny and independent review (which must be carried out at the expense of the applicant).

6.41 Evidence in the SHMA update 2019 indicates that single key workers are likely to require social rental accommodation or support from Local Housing Allowance in order to get a home of their own.

6.42 Planning obligations will be used to ensure that the affordable housing will remain as such in perpetuity, where practicable.

Monitoring Indicators

Indicator	Target	Data source
Number of affordable units (net) approved and delivered each year by tenure and type	Achieve mix set out in the SHMA. Over the lifetime of the Plan achieve 30% of dwellings to be affordable.	Planning applications and appeals
Percentage of all new affordable homes that are for rent	75%	Planning applications and appeals
Value and allocation of contributions to secure delivery of affordable housing each year	To ensure that contributions are spent to secure the delivery of affordable housing.	In house monitoring
Where a review mechanism is triggered, it is implemented and the number of extra homes delivered, or cash in lieu secured, is recorded.	Extra homes delivered of contribution in lieu.	In house monitoring
Number of people on the Council Housing Register	To ensure development schemes are addressing current affordable housing needs.	Council Housing Register

Key Evidence

- National Planning Policy Framework (2021)
- Planning Practice Guidance
- Strategic Housing Market Assessment (2015) and SHMA update (2019)

- Spelthorne Borough Council Housing Register

H3: Meeting the Needs of Gypsy, Traveller and Travelling Showpeople

1) National planning policy for Gypsy, Traveller and Travelling Showpeople is set out in the National Planning Policy Framework (NPPF) and Planning Policy for Traveller Sites. The Equality Act 2010 requires Councils to take steps to meet the needs of people who have relevant protected characteristics, such as Romany Gypsies and Irish and Scottish Travellers.

2) The Council will make provision for additional Gypsy and Traveller pitches and additional plots for Travelling Showpeople to meet the accommodation needs in the Borough which are identified in the most up-to-date Gypsy and Traveller Accommodation Assessment (GTAA).

3) The Council will safeguard existing authorised pitches and plots for Gypsies, Travellers and Travelling Showpeople and the loss of these to other uses will be resisted unless it can be demonstrated that there is a surplus supply of traveller pitches and plots for Gypsies, Travellers and Travelling Showpeople in the Borough.

4) In addition to site allocations in this Plan, planning permission for Gypsy and Traveller and Travelling Showpeople accommodation will be granted provided that all of the following criteria are met and subject to other policies in the Plan:

    (a) There is an identified need for the pitch or plot provision.

    (b) There is good access to local services, including education, health and welfare services, and shop.

    (c) There is safe access to the highway, public transport services and other sustainable transport options.

    (d) Adequate onsite facilities are provided for parking, storage and waste collection.

    (e) The location of the site provides a safe living environment, free from the risk of flooding and risks to health through contamination, noise, vibration, odour and pollution.

    (f) The potential for successful integration between travelling and settled communities can be demonstrated.

5) Caravans, mobile homes and park homes intended for permanent residential use are considered highly vulnerable under the planning practice guidance and therefore not allowed in Flood Zone 3 and only allowed in Flood Zone 2 if the Exception Test is passed.

Definitions

6.43 For the purposes of this planning policy, ‘Travellers’ means ‘Gypsies and Travellers’ and ‘Travelling Showpeople’ as defined below.

- Gypsy and Travellers: Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or

dependents' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of Travelling Showpeople or circus people travelling together as such.

- Travelling Showpeople: Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependents' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.

6.44 For the purposes of this planning policy, 'pitch' means a pitch on a 'Gypsy and Traveller' site and 'plot' means a pitch on a 'Travelling Showpeople' site (often called a 'yard'). This terminology differentiates between residential pitches for 'Gypsies and Travellers' and mixed-use plots for 'Travelling Showpeople', which may/will need to incorporate space or to be split to allow for the storage of equipment.

6.45 A pitch is an area normally occupied by one household, which typically contains enough space for one or two caravans but can vary in size. A site is a collection of pitches which form a development exclusively for Gypsies and Travellers. For Travelling Showpeople, the most common descriptions used are a plot for the space occupied by one household and a yard for a collection of plots which are typically exclusively occupied by Travelling Showpeople**.**

Reasoned Justification

6.46 National planning policy for Gypsy, Traveller and Travelling Showpeople is set out in the National Planning Policy Framework and Planning Policy for Traveller Sites and the Council will expect all new sites to meet the requirements of national policy. New pitches and plots should have adequate utility services and amenity space, safe turning space and parking and be in areas with reasonable access to schools, health services and local services. Travelling Showpeople sites may also need space for related business storage.

6.47 The Planning Policy for Traveller Sites (PPTS) requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of sites against their own, locally-set targets. The Council published a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) in 2018 which has identified the need for Traveller pitches and Travelling Showpeople plots in the Borough over the Plan period. The Housing Act 2004 requires local authorities to take account of the needs of travelling people and to create strategies to meet those needs. National policy requires local planning authorities to identify and if necessary, allocate sufficient sites to meet the needs of these groups within their local plans.

6.48 Households who do not travel fall outside the planning definition of a Traveller. However Romany Gypsies, Irish and Scottish Travellers may be able to claim a right to culturally appropriate accommodation under the Equality Act (2010). In addition, provisions set out in the Housing and Planning Act (2016) now include a duty (under Section 8 of the 1985 Housing Act that covers the requirement for a periodical review of housing needs) for local authorities to consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed.

6.49 The Council recognises the value of closer working relations with the local Traveller

community. Often a socially excluded group, the community has a significantly lower life expectancy, lower educational attainment, and strikingly, a Gypsy and Traveller child is three times more likely to be taken into care than a child from the settled community[35]. The Council recognises the contribution that decent permanent culturally suitable accommodation can have to the overall wellbeing of Traveller families.

6.50 Gypsy and Traveller sites can either be publicly or privately owned residential sites. Pitches on public sites can be obtained through signing up to a waiting list, and the costs of running the sites are met from the rent paid by the licensees (similar to social housing). The alternative to public residential sites are private residential sites and yards for Gypsies, Travellers and Travelling Showpeople. These result from individuals or families buying areas of land and then obtaining planning permission to live on them. Households can also rent pitches on existing private sites. Therefore, these two forms of accommodation are the equivalent to private ownership and renting for those who live in bricks and mortar housing. Generally, the majority of Travelling Showpeople yards are privately owned and managed.

Key Evidence

- Spelthorne Borough Council Gypsy and Traveller Accommodation Assessment (GTAA) 2018

[35] https://www.gypsy-traveller.org/wp-content/uploads/2017/03/A-guide-for-professionals-working- with-Gypsies-and-Travellers-in-the-public-care-system.pdf

7. Environment

7.1 Two of the most pressing challenges to be addressed at all scales in the 21st century are climate change and the loss of biodiversity. Addressing these challenges, as well as supporting development which delivers health and wellbeing benefits for our community lies at the heart of achieving sustainable development. The natural environment plays a key role in meeting these objectives and as such the protection and enhancement of the Borough's natural environment is fundamental to the success of the Plan and securing a sustainable future for Spelthorne.

7.2 Spelthorne benefits from a diverse natural environment, highly valued by our communities and offering a wide range of benefits; our natural environment plays a key role in making the Borough an attractive place to live and work. Recognising the importance of both protecting the existing natural environment and delivering high quality development which provides further enhancements, the policies within the Plan set out how this will be achieved over the next 16 years.

Green and Blue Infrastructure

7.3 Encompassing more than simply conventional open space, a successfully planned and implemented green and blue infrastructure network provides multiple, multifunctional benefits at all scales and makes a significant contribution to sustainable development.

7.4 Green and blue infrastructure is a strategically planned network of features, including parks, open spaces, playing fields, woodlands, as well as street trees, allotments, private gardens, green roofs and walls and sustainable drainage systems (SuDS), as well as watercourses and other waterbodies

7.5 The benefits of good quality green and blue infrastructure include improving health and wellbeing, air quality, nature recovery and resilience to and mitigation of climate change, along with addressing issues of social inequality and environmental decline.

E1: Green and Blue Infrastructure

1. All development must contribute towards the provision, protection and enhancement of the wider green and blue infrastructure network at a scale commensurate with the proposal.

2. All proposals for major development will be required to provide a high standard of design for green infrastructure in accordance with established, recognisable standards, including the National Design Guide[36], the Natural England Green Infrastructure Framework[37] and Building with Nature Standards[38].

3. Where development is located on or adjacent to a watercourse or reservoir proposals must contribute towards the delivery of a high quality multi-functional blue infrastructure network through ensuring the protection and enhancement of the ecological, flood risk management, landscape and recreational value of that water body.

4. Development proposals impacting upon rivers and watercourses must demonstrate how they will, maintain and enhance the quality of blue infrastructure, in accordance with the Water Framework Directive.

5. Green and blue infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits and should ensure appropriate long-term stewardship arrangements are in place to secure the quality of green and blue infrastructure in perpetuity[39].

6. Development should have regard to and contribute towards any Green and Blue Infrastructure Strategy/SPD that is produced.

Definitions

7.6 Green Infrastructure is defined in the NPPF as 'a network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity'[40]

7.7 Blue Infrastructure is the network of watercourses and other bodies of water including reservoirs, which provide ecological, flood risk management, landscape and recreational value to the Borough. This also includes the banks and corridors immediately along the watercourse which can provide significant biodiversity benefits and play a vital role in ensuring habitat connectivity.

[36] https://www.gov.uk/government/publications/national-model-design-code
[37] https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx
[38] https://www.buildingwithnature.org.uk
[39] Successful long-term stewardship of place requires planning for effective management, maintenance and governance of infrastructure for the lifetime of the development. The 'Lifespan' chapter of the National Model Design Code sets out guidance on long term stewardship - https://www.gov.uk/government/publications/national-model-design-code. The Council's expectations regarding long term stewardship will be set out in an SPD or advice note to follow.
[40] NPPF, 2021

Reasoned Justification

7.8 All development should contribute towards the provision, improvement, and maintenance of the green infrastructure network across the Borough where appropriate to do so. Whilst the Council will only expect 'major' development proposals to be designed in accordance with established, recognised green infrastructure standards, all developments can make a positive impact on the green infrastructure network and proposals will, be expected to make such provision at a scale that is commensurate with the development.

7.9 Simple measures and features can be incorporated into householder and minor developments that can contribute to or enhance the green infrastructure network. Cumulatively, small-scale sites already play an important role in providing and connecting the existing green infrastructure network and applicants are encouraged to consider enhancing existing green infrastructure within their development and to avoid or mitigate loss wherever possible.

7.10 The Water Framework Directive[41] requires rivers and waterbodies in the UK to achieve good ecological status by 2027. This includes resisting the establishment and spread of non-native invasive species which can have a significant detrimental impact on native species. UK domestic law has retained the WFD and requires that River Basin Management Plans (RBMPs) are produced to improve the status of waterbodies. Many of the waterbodies in the Borough support recreational uses which are required to be carried out within tight environmental restrictions and are regulated. Recreational uses are supported provided that they respect the ecological and landscape values of the waterbodies and the associated corridor.

Long Term Stewardship

7.11 Development proposed within this Local Plan will enhance the existing green infrastructure network as well as delivering a diverse range of green and blue infrastructure features. How this provision is delivered and maintained in perpetuity has a direct impact on the quality of a place in the long term.

7.12 Expanding and enhancing the green and blue infrastructure network will provide multiple benefits to the Borough as a whole, however, preserving its quality and condition for the long term requires effective stewardship. Planning for long term stewardship of community assets, including its financing and governance structure must be considered from the outset if a successful and sustainable outcome is to be achieved.

7.13 In the past it was common for the Council, together with its partners to adopt and manage new community assets (including the green and blue infrastructure and other community facilities) which were delivered through development. However, in light of ever-increasing public sector financial constraints and the ongoing pressures on the Council's resources this model of long-term stewardship is no longer the preferred option of the Council in the majority of circumstances.

7.14 With a broad range of stewardship models and funding opportunities available, it is not possible to adopt a 'one size fits all' approach. The most appropriate stewardship option for a development will vary depending on the scale, location and community assets provided and must be agreed on a case-by-case basis. Community

[41] http://ec.europa.eu/environment/water/water-framework/index_en.html

stewardship models are encouraged and will be supported.

Nevertheless, the Council recognises that a community stewardship model requires sufficient level of development to create a natural community focus or where there is adequate scale of on-site community assets to manage. In circumstances where the scale of development is not sufficient to support a community management stewardship model, a private management company solution may be considered acceptable. Where this is the case, proposals will need to demonstrate that the private management company proposed will:

- be run in a way that ensures residents have and retain a key governance role,
- maintain openness and transparency,
- be focused on the local development and the maintenance of the environment in the longer term with surpluses reinvested for such purpose,
- provide a quality service at a reasonable cost over the longer term,
- allow for residents to take control in the longer term should this be their ambition.

Key Evidence

- Biodiversity Opportunity Areas: the basis for realising Surrey's ecological network (Surrey Nature Partnership, 2019) (available online at: https://surreynaturepartnership.org/wp-content/uploads/2019/10/boas_the-basis-for-realising-surreye28099s-ecological-network_synp_sept_2019.pdf)
- Water Framework Directive (2000) (available online at: Water Framework Directive (europa.eu))
- Environment Act 2021 (available online at: https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted)
- Green Infrastructure Framework – Principles and Standards for England (Natural England, 2021, available online at: https://www.thegpsc.org/blogs/green-infrastructure-framework-england#:~:text=Natural%20England%20has%20launched%20its,in%20improving%20access%20to%20nature.)

E2: Biodiversity

1) The Council will support development proposals which restore, maintain and enhance habitat connectivity and will seek opportunities for habitat creation particularly within Biodiversity Opportunity Areas. Development proposals will be expected to contribute to biodiversity through clearly demonstrating improvements when submitting a planning application as part of securing biodiversity net-gain.

2) Development on or adjacent to the following designated sites in the Borough will need to have reference to this Policy:

    - Ramsar sites (International).
    - Special Protection Areas (European).
    - Sites of Special Scientific Interest and National Nature Reserves (National).
    - Ancient Woodland, ancient or veteran trees; and/or trees and hedgerows protected by a Tree Preservation Order.
    - Sites of Nature Conservation Importance, Local Nature Reserves (Local)
    - Other priority habitats and priority species not identified above (Local); designated Local Green Space where richness of wildlife has been identified as a contributing factor in its designation; and any area in Spelthorne that may be identified in a Local Nature Recovery Strategy; trees considered to make a significant contribution to their surroundings, individually or as a group.

3) The Council will maintain Sites of Nature Conservation Importance as shown on the Policies Map and will only permit development proposals within these sites, where there will be no adverse effect, either directly or indirectly on their ecological interest and this has been clearly demonstrated through use of appropriate assessment. Development proposals will be supported which clearly demonstrate enhancement to the value of SNCIs and where an agreed management plan is set out which shows how the enhancements will be secured for the long term.

4) For development proposals that affect national, regional or locally protected sites not forming part of a Ramsar or SPA, (such as SSSIs, SNCIs, LNRs) permission will only be granted where it can be demonstrated that the benefits of the development proposed clearly outweigh the decrease in the nature conservation value of the site and that:

    (a) any such decrease has been kept to a minimum,

    (b) mitigation or compensation to provide for species protection and/or habitat creation or enhancement has been made within the area, and

    (c) appropriate measures to monitor the effectiveness of the mitigation have been established.

Biodiversity Net Gain

5) The Council will seek net gains in biodiversity, through creation or expansion, restoration, enhancement and management of habitats and features to improve the

status of priority habitats and species. All development[42] will be expected to provide at least 10% net gain. Major development should calculate this through the most up-to date version of the Biodiversity Metric, appropriate to scale of development.(or its equivalent). For development of nine dwellings or less, the latest small sites metric (or its equivalent) should be used to calculate net gain.

6) The Council will expect developers to demonstrate full consideration of a variety of means in improving biodiversity within developments including, but not limited to, the use of innovative approaches where appropriate such as:

- the installation of bee bricks,
- use of bird nest and bat roost boxes or gabions,
- incorporation of green roofs and living walls
- minimise external lighting

7) Development proposals should demonstrate clearly how net gain will be achieved and this should be in accordance with the Surrey Local Nature Recovery Strategy (to be prepared) and take account of other national, regional and local biodiversity strategies including any Supplementary Planning Document and/or additional guidance as produced by the Council.

8) Biodiversity net gain should be delivered using the BNG mitigation hierarchy of avoid losses, mitigate and lastly compensate. Where off site compensation is required, this should maximise opportunities within the Borough boundary and should be as close to the development site as possible BNG delivery should be:

i) On site as part of the development;

ii) Where on-site delivery is not feasible, it should be provided on land adjacent to, or as close to the development site, as possible;

iii) Off-site delivery should, where feasible and practical, be on land within the Borough boundary.

Waterbodies in the Borough

9) Where development is proposed on or adjacent to any waterbodies in the Borough, reference should be made to the following:

10) Development proposals not directly related to the management of Ramsar, and SPA, as well as SSSI units forming part of these designations will not be permitted unless it can be demonstrated that the impact of proposals, either alone or in combination, will not result in likely significant effects.

[42] All development as set out in Environment Act 2021

11) Development proposals on, or impacting non-SPA relevant sites which support the wider SPA network, will not be permitted unless it can be demonstrated that the impact of the proposals; either alone or in combination, will not result in likely significant effects.

Definitions

7.15 Biodiversity Opportunity Areas (BOAs) are identified as the most important areas for biodiversity in the Borough. BOAs represent the basis for an ecological network where improved habitat management as well as efforts to restore and create habitats will be most effective in enhancing connectivity to benefit species recovery.

7.16 Biodiversity Net Gain (BNG) is an approach to development, and/or land management, that aims to leave the natural environment in a measurably better state than it was beforehand.

Reasoned Justification

7.17 Biodiversity is a means of quantifying the natural environment, which surrounds us everywhere, and is connected to many aspects of everyday life. Biodiversity can be described as the richness and variety of living things which exist in a given area. Biodiversity and geodiversity (the diversity of geological sites) is not just confined to identified and protected sites.

7.18 Over the past half a century, there have been significant declines in several species, which has resulted in many cases of local extinction, linked largely to loss of habitat. The causative factors behind this loss of natural habitat and species include climate change, the expansion of the built environment and the way important habitats are managed. It is therefore important to conserve and enhance natural habitats, which are key to protecting individual species and, in turn, to achieving sustainable development as well as ensuring that when development does come forward it minimises its impacts as fully as possible and provides opportunities to achieve net gains in biodiversity.

7.19 There are a number of protective designations within the Borough that are of international, national and local significance. These designations include four SSSI with a further SSSI, which include the Wraysbury reservoir network to the north, Staines Moor and Shortwood Common. Additionally, these reservoirs are also identified as Special Protection Ares and Ramsar sites as part of the South West London Waterbodies (SWLWB) network which also includes sites outside the Borough. These networks are crucial for migrating and over-wintering birds. As part of this, Spelthorne has a number of non-SPA relevant sites, primarily waterbodies, which support the SWLWB network and provide refuge for many species. There are also 26 local SNCI spread across Spelthorne, along with two Local Nature Reserves and an area of ancient woodland.

7.20 Paragraph 179 of the Framework sets out that local plan policies should identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks. Spelthorne has a number of international, national and locally designated biodiversity sites which justify protection.

7.21 Biodiversity net-gain is an approach which aims to leave the natural environment in a

measurably better state than beforehand. This approach has been included as part of the Environment Act 2021 which stipulates that net gain should be mandatory by November 2023. Biodiversity net gain will be sought on sites where existing green assets can be improved or enhanced or where these are lost, such as on greenfield sites, proposed development will provide significant replacements.

7.22 Development proposals should refer to any relevant Supplementary Planning Documents or Action Plans that are produced by the Council which guide on biodiversity net gain for planning applications. Additionally, nature recovery networks are to be proposed in the Local Nature Recovery Strategy for Surrey, which is currently being prepared. Once complete, development will have to take account of the LNRS when delivering biodiversity net gain and other measures/mitigation.

7.23 BOAs are key areas where priority habitat can be created, improved or restored and there are two significant areas identified in Spelthorne where opportunities for restoration and creation of habitats exist:

- Staines Moor to Shortwood Common (TV03)
- Shepperton to Thorpe[43] (TV04)
- River Thames (TV06)

7.24 As such, this justifies the inclusion of a policy to seek to achieve these objectives where possible.

Key Evidence

- Biodiversity Opportunity Areas: the basis for realising Surrey's ecological network (Surrey Nature Partnership, 2019) (available online at: https://surreynaturepartnership.org/wp-content/uploads/2019/10/boas_the-basis-for-realising-surreye28099s-ecological-network_synp_sept_2019.pdf)
- Water Framework Directive (2000) (available online at: Water Framework Directive (europa.eu))
- Environment Act 2021 (available online at: https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted)
- Biodiversity net gain: updating planning requirements (Department for Environment, Food and Rural Affairs) (available online at: Biodiversity net gain: updating planning requirements - GOV.UK (www.gov.uk)

[43] https://surreynaturepartnership.files.wordpress.com/2014/11/biodiversity-opportunity-areas_surrey-nature-partnership_20151.pdf

E3: Managing Flood Risk

1) To reduce the overall and local flood risk development must be located, designed and laid out to ensure that it is safe *(as defined in PPG Flood Risk and Coastal Change and the Level 1 SFRA)*, flood risk is not increased elsewhere) and that residual risks are safely managed. The council would support measures which result in a reduction in flood risk.

2) Through the application of the sequential test, new development should be guided to areas of lowest flood risk from all sources[44]. Where individual sites contain different levels of flood risk e.g. flood zones, a site-specific sequential approach should be applied to locate the most vulnerable uses in the areas of lowest risk from all sources. The exception test will continue to be applied where national planning policy states that it is necessary.

3) All development proposals[45] are required to demonstrate that they will not result in an increase in surface water run-off from the site ensuring the receiving drainage system is adequate to deal with flows from the site. The Council will expect Sustainable Drainage Systems (SuDS) to be included within the designs to manage surface water drainage and provide multi-functional benefits in accordance with the NPPF, unless it can be demonstrated that they are not appropriate. SuDS should:

    a) Ensure surface run-off is managed as close to the source as possible and does not increase flood risk elsewhere;

    b) Be in accordance with the rainwater disposal hierarchy of Building Regulations Part H3 (3);

    c) In circumstances where it has been proved that infiltration is impractical, ensure discharge of surface water to watercourse/sewer shall not exceed the following peak rates:

        - at pre-development greenfield runoff rates on all new development;
        - as close as reasonably practicable to greenfield run off rates from all other brownfield sites;

    d) Be designed to be multi-functional and incorporate sustainable drainage into landscaping and public realm, including maximising opportunities to establish surface water ponding areas, urban watercourse buffer areas and multi-use flood storage areas in locations of high surface water flood risk and critical drainage areas to improve flood resilience, amenity and biodiversity;

    e) Achieve improvements in water quality through a sustainable drainage system management train;

    f) Be designed with consideration of future maintenance and climate change; and

    g) Make improvements in accordance with the Council's most up to date Infrastructure Delivery Plan.

[44] https://www.gov.uk/guidance/flood-risk-assessment-the-sequential-test-for-applicants
[45] Excluding minor householder such as porches and conservatories

4) Development in Flood Zones 2 and 3a[46] and on a dry island[47] will be permitted provided that:

(a) the vulnerability of the proposed use is appropriate for the level of flood risk on the site (see table below);

(b) the proposal passes the sequential and exception test (where required) as outlined in the NPPF and guidance;

(c) a site-specific flood risk assessment demonstrates that the development, including the access and egress, will be safe for its lifetime (taking into account the appropriate climate change allowance) without increasing flooding elsewhere[48], and will, where possible, reduce flood risk overall;

(d) safe access and egress[49] is demonstrated for all developments including residential development of one or more net additional units[50];

(e) the scheme incorporates flood protection, flood resilience and resistance measures appropriate to the character of the area[51] and;

(f) applications include appropriate flood warning and evacuation[52] and site drainage systems take account of storm events and flood risk of up to 1% annual probability or 1 in 100 year event with an appropriate allowance for climate change.

5) Applications must be supported by Flood Risk Assessments where appropriate[53] that demonstrate the development will be safe, not increase flood risk elsewhere, and maximise opportunities to reduce flood risk from all sources.

1 in 30 year – Flood Zone 3b

[46] As identified on the latest Environment Agency flood risk maps and the Council's latest Strategic Flood Risk Assessment

[47] Defined in SFRA as Dry islands: The extensive area of floodplain within Spelthorne is relatively flat; however, there are certain areas of slightly higher ground which are less prone to flooding than the land around them. During times of flood it is possible that all the land surrounding these areas becomes flooded, resulting in this higher area becoming a 'dry island'. During prolonged periods of flooding it may prove difficult to provide resources and emergency services to those living in these areas. In order to reduce the flood risk, these 'dry islands' should be treated the same as for the level of flood risk in the area surrounding them, regardless of their size. When contemplating development, it is important to study the wider area of the flood map to ensure that there is a dry route to a point outside the floodplain

[48] As set out in the Planning Practice Guidance (para 49) "Where flood storage from any source of flooding is to be lost as a result of development, on-site level-for-level compensatory storage, accounting for the predicted impacts of climate change over the lifetime of the development, should be provided.

[49] See Flood risk and coastal change section of the Planning Practice Guidance and section 6.2 of the Spelthorne SFRA Level 1 for more information of safe access and egress.

[50] Not required for residential extensions or replacement dwellings

[51] Please refer to section 5.8 of SFRA Level 1 which covers measures to control and mitigate flood risk. Section 5.8 specifically addresses flood resilience and resistance measures.

[52] https://www.gov.uk/government/publications/personal-flood-plan

[53] See NPPF (2021) footnote 55 or NPPF (2024) footnote 63

6) Within the 1 in 30 year[54] (Flood Zone 3b or functional floodplain, which includes, but is not limited to, the 3.3% annual probability extent[55];

   (a) the provision of essential infrastructure should be avoided but will be considered if demonstrated to pass the exceptions test. Essential infrastructure should be designed and constructed to:
      i) remain operational and safe for users in times of flood
      ii) result in no net loss of floodplain storage
      iii) not impede water flows and not increase flood risk elsewhere

   (b) change of use to a higher vulnerability classification will not be permitted;

   (c) extensions or re-development of buildings may be considered, subject to the following:
      i) the footprint of the building should not be increased unless level for level floodplain compensatory storage can be provided,
      ii) finished floor levels shall not be lower than the existing and where possible they should be raised[56];
      iii) surface water runoff rates and volumes from the site should be reduced;
      iv) where possible, floodplain storage capacity should be increased and space created for flooding to occur by restoring functional floodplain;
      v) flood resistance and resilience measures[57] be incorporated and;
      vi) inclusion of measures to ensure development remains safe for users in time of flood[58].
   (d) Extent basements, basement extensions, conversions of basements to a higher vulnerability classification are not permitted.

7) Schemes which deliver a betterment will be supported, subject to consultation with the Environment Agency where required, and meeting other policy requirements of the Plan.

River Thames Scheme

8) The Council supports proposals for strategic flood relief measures, including the proposed flood channel through the Borough as part of the River Thames Scheme. The proposed route of the channel and the land adjacent to it, as shown on the Policies Map will be safeguarded for this purpose[59].

[54] Existing infrastructure or solid buildings that resist water ingress are not included within the definition of Flood Zone 3b Functional Floodplain and the associated planning requirements do not apply.
[55] The definition of FZ3b being used by Spelthorne is broader than the 3.3% annual probability event, it includes the use of the 2% annual probability event for the River Colne. *Where a watercourse does not have modelling available for the 1 in 30 year (3.3%* annual probability*) flood event, a conservative approach should be applied and the extent of Flood Zone 3 used to define Flood Zone 3b, until such a time as modelling is available.*
Any areas designed to flood (e.g. flood storage areas) should also be included in the definition of FZ3b in accordance with Planning Practice Guidance, Flood Risk and Costal Change
[56] The applicant must provide a written justification of why it is not possible for the extension/redevelopment to raise the floor level
[57] Section 5.8 of Level 1 SFRA explains flood resilience measures
[58] This may incorporate the timely evacuation of properties prior to the onset of flooding in accordance with an individual Flood Warning and Evacuation Plan for the site).
[59] As set out in para 161 (b) of the NPPF 2021.

Definitions

7.25 Different areas of flood risk in Spelthorne Borough are determined by definitions contained within national planning practice guidance and the Council's Strategic Flood Risk Assessment (Level 1).

- Flood resistance: Flood-resistant construction can prevent entry of water or minimise the amount that may enter a building where there is short duration flooding outside with water depths of 0.6 metres or less. This form of construction should be used with caution and accompanied by resilience measures, as effective flood exclusion may depend on occupiers ensuring some elements, such as barriers to doorways are put in place and maintained in a good state.
- Flood resilience: Flood-resilient buildings are designed and constructed to reduce the impact of flood water entering the building so that no permanent damage is caused, structural integrity is maintained, and drying and cleaning is easier and the building can be re-occupied more quickly.

7.26 Planning Practice Guidance[60] states that flood resistance and resilience measures should not be used to justify development in inappropriate locations.

Flood Zones (source Planning Practice Guidance Flood risk and coastal change)

Flood Zone	Definition
Zone 1 Low Probability	Land having a less than 0.1% /1 in 1,000) annual probability of river or sea flooding. (Shown as 'clear' on the Flood Map – all land outside Zones 2, 3a and 3b)
Zone 2 Medium Probability	Land having between a 1% and 0.1% (1 in 100 and 1 in 1,000) annual probability of river flooding; or land having between a 0.5% and 0.1% (1 in 200 and 1 in 1,000) annual probability of sea flooding.
Zone 3a High Probability	Land having a 1% (1 in 100) or greater annual probability of river flooding; or land having a 0.5% (1 in 200) or greater annual probability of sea flooding.
Zone 3b The Functional Floodplain	This zone comprises land where water from rivers or the sea has to flow or be stored in times of flood. The identification of functional floodplain should take account of local circumstances and not be defined solely on rigid probability parameters. Functional floodplain will normally comprise: • land having a 3.3% or greater annual probability of flooding, with any existing flood risk management infrastructure operating effectively; or • land that is designed to flood (such as a flood attenuation scheme), even if it would only flood in more extreme events (such as 0.1% annual probability of flooding). Local planning authorities should identify in their Strategic Flood Risk Assessments areas of functional floodplain and its boundaries accordingly, in agreement with the Environment Agency.

[60] Updated 25 August 2022

Flood Resistance

7.27 Note: The Flood Zones shown on the Environment Agency's Flood Map for Planning (Rivers and Sea) available on the Environment Agency's website, do not take account of the possible impacts of climate change and consequent changes in the future probability of flooding. Reference should therefore also be made to the Strategic Flood Risk Assessment when considering location and potential future flood risks to developments and land uses.

7.28 Flood resistance measures aim to keep water out and give occupants time to relocate ground floor contents. There are a range of flood protection devices/methods including:

- Using materials and construction with low permeability
- Landscaping e.g. creation of low earth bunds (subject to this not increasing flood risk elsewhere)
- Raising thresholds and finished floor levels (See 13.1 and Planning Practice Guidance) e.g. porches with higher thresholds than main entrance
- Flood gates with waterproof seals
- Sump and pump for floodwater to remove waste water faster than it enters
- Door guards and airbrick covers

Flood Resilience

7.29 Flood resilience measures are designed to allow water in but to limit damage and allow rapid re-occupancy. There are a range of options:

- Use materials with either good drying and cleaning properties, or, sacrificial materials that can easily be replaced;
- Design for water to drain away;
- Design access to all spaces to permit drying and cleaning;
- Raise the level of electric wiring, appliances and utility meters (0.1m above flood level);
- Ground supported floors with concrete slabs coated with impermeable membrane;
- Tank basements, cellars and ground floors with water resistant membranes; and
- Plastic water resistant internal doors.

Flood Zone 3b Functional Floodplain

7.30 The definition of Flood Zone 3b Functional Floodplain for Spelthorne Borough Council is set out in the Strategic Flood Risk Assessment (SFRA) Level 1 document, which can be found on the Council website. It includes all buildings which have not been designed to exclude floodwater and do not resist water ingress, such as garages and warehouses, as well as roads, other linear features and other areas for car parking or recreational use which may provide important flow routes and flood storage functionality.

7.31 The definition of FZ3b being used by Spelthorne is set out in the Strategic Flood Risk Assessment (SFRA) Level 1 document, which can be found on the Council website. It is broader than the 3.3% annual probability event, it includes the use of the 2% annual probability event for the River Colne. Any areas designed to flood (e.g. flood storage areas) should also be included in the definition of FZ3b in accordance with Planning Practice Guidance, Flood Risk and Costal Change. *Where a watercourse does not have modelling available for the 1 in 30 year (3.3%* annual probability*) flood event, a conservative approach should be applied and the extent of Flood Zone 3 used to define Flood Zone 3b, until such a time as modelling is available.*

7.32

Flood Risk Vulnerability and Flood Zone 'incompatibility' (Source: PPG)

Flood Zones	**Flood Risk Vulnerability Classification**				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compat
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	X	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	X	X	X	✓ *

Key:

✓ Exception test is not required

X Development should not be permitted

Notes

- This table does not show the application of the Sequential Test which should be applied first to guide development to the lowest flood risk areas; nor does it reflect the need to avoid flood risk from sources other than rivers and the sea;
- The Sequential and Exception Tests do not need to be applied to those developments set out in National Planning Policy Framework footnote 56. The Sequential and Exception Tests should be applied to 'major' and 'non major' development;
- Some developments may contain different elements of vulnerability and the highest vulnerability category should be used, unless the development is considered in its component parts.

"†" In Flood Zone 3a essential infrastructure should be designed and constructed to remain operational and safe in times of flood.

"*" In Flood Zone 3b (functional floodplain) essential infrastructure that has passed the Exception Test, and water-compatible uses, should be designed and constructed to:

- remain operational and safe for users in times of flood;
- result in no net loss of floodplain storage;
- not impede water flows and not increase flood risk elsewhere.

Reasoned Justification

7.33 In Spelthorne there are areas within the 1 in 30 (Flood Zone 3b or functional floodplain, which includes, but is not limited to, the 3.3% annual probability extent[61]) or greater flood extent that are already developed and are prevented from flooding by the presence of existing infrastructure or solid buildings. Whilst these areas may be subject to frequent flooding, it may not be practical to refuse all future development. As such, and in accordance with the PPG, in some instances the Council will consider existing building footprints, where they can be demonstrated to exclude floodwater, not to be defined as Flood Zone 3b Functional Floodplain.

7.34 The approach the Council will take to development within the 1 in 30 year (Flood Zone 3b or functional floodplain, which includes, but is not limited to, the 3.3% annual probability extent) flood outline recognises the importance of pragmatic planning solutions that will not unnecessarily 'blight' areas of existing development, the importance of the undeveloped land surrounding them and the potential opportunities to reinstate areas which can operate as functional floodplain through redevelopment to provide space for floodwater and reduce risk to new and existing development.

7.35 The consideration of whether a building resists water ingress will be considered on a case-by-case basis as part of the planning application process, having regard to the presence of existing buildings on the site and the existing routing of floodwater through the site during times of flooding.

[61] The definition of FZ3b being used by Spelthorne is broader than the 3.3% annual probability event, it includes the use of the 2% annual probability event for the River Colne. Where a watercourse does not have modelling available for the 1 in 30 year (3.3% annual probability) flood event, a conservative approach should be applied and the extent of Flood Zone 3 used to define Flood Zone 3b, until such a time as modelling is available. Any areas designed to flood (e.g. flood storage areas) should also be included in the definition of FZ3b in accordance with Planning Practice Guidance, Flood Risk and Costal Change

Monitoring Indicators

Indicator	Target	Data source
Number of planning decisions, including appeals, granting permission not in accordance advice from the Environment Agency or Surrey CC.	No planning permissions that are not in accordance with advice from the Environment Agency or Surrey CC.	The Borough Council, Environment Agency

Key Evidence

- Local Flood Risk Management Strategy (Surrey County Council, 2017) (Surrey Local Flood Risk Management Strategy - Surrey County Council
- Level 1 Strategic Flood Risk Assessment (Spelthorne Borough Council, October 2024)
- Level 2 Strategic Flood Risk Assessment (Spelthorne Borough Council, October 2024)
- Spelthorne Water Cycle Study (Spelthorne Borough Council, 2019)
- Sustainable Drainage System Design Guidance - Surrey County Council
- Non-Major Sustainable Drainage System Design Guidance - Surrey County Council

E4: Environmental Protection

Air Quality

1) The Council will seek to protect and improve the Borough's air quality by ensuring all development complies with national policy[62] and guidance and the most up-to-date Air Quality Action Plan.
2) An applicant will be required to submit an air quality assessment for development proposals where development:

    (a) is in an Air Quality Management Area (AQMA), or is predicted to impact pollutant levels within an AQMA and

    (b) generates significant levels of pollution, or

    (c) increases traffic volumes or congestion, or

    (d) is for non-residential uses of 1000 sqm or greater, or

    (e) is for 10 or more dwellings, or

    (f) involves development sensitive to poor air quality or

    (g) introduces a potentially significant point source of air pollutant emissions or alters the emissions of an existing point source. Applicants are strongly encouraged to avoid the introduction of a point source by utilising technology such as Air Source Heat Pumps (ASHP). Where a development proposal introduces a point source, for example a Combined Heat and Power (CHP) unit, the Air Quality Assessment should demonstrate the necessity of the proposed equipment.

3) For development proposals that could potentially cause, exacerbate or introduce new exposure to poor air quality, mitigation and compensation measures should be incorporated. Mitigation is required to ensure that all major developments are sustainable from an air quality perspective and for the protection of public health. Where on site measures alone are not possible or are insufficient to reduce the impact on air quality, applicants should consider the scope for mitigating the impact by contributing to funding of other initiatives that improve air quality.

4) Planning permission will not be granted for proposals where adverse effects on air quality for existing receptors and/or future occupiers are of a significant scale, either individually or in combination with other proposals and/or the effects cannot be appropriately and effectively mitigated.

Water Quality

5) The Council will ensure all development located near ground and surface water have the appropriate measures in place to mitigate any adverse impact on water quality and water features. Development should not have any adverse impact on groundwater flow or quantity, nor should there be any adverse impact on groundwater quality. Planning permission will not be granted for developments which do not demonstrate the incorporation of water efficiency measures such as water recycling and collection

[62] In line with NPPF, paragraph 199

features. Wherever practical, Sustainable Drainage System (SuDS) should be incorporated to minimise the discharge of surface water to the sewer system.

Odour

6) New development should not be located in areas where future occupiers may be affected by existing sources of odour unless it is demonstrated that there would be no adverse impact on the amenity of future occupiers or that any necessary mitigation measures have been identified and secured.

Noise

6) The Council will seek to protect and improve local noise conditions as far as reasonably practicable. The Council will ensure that development proposals that may generate unacceptable noise or be unreasonably impacted by noise sources incorporate appropriate attenuation measures to minimise the effects on new and existing residents. The adverse impacts of noise are to be reduced to acceptable levels through good design, layout and orientation of sites and buildings, and adequate noise insulation. In residential areas close to the airport, only one-for-one replacement of existing housing will be allowed within the 66 db. LAeq and above noise contour. The Council will require an acoustic report to accompany an application for development proposals that may be sensitive to noise sources, or might cause unacceptable noise for residents, businesses or the environment. Planning permission will be refused where the impact of noise cannot be mitigated to an acceptable level.

Light

7) Applicants developing proposals for lighting will be required to assess the impact of the lighting scheme and demonstrate there are no unacceptable adverse impacts. In designing new developments, consideration should be given to ensuring that the new occupiers are not adversely affected by existing sources of light pollution.

The Council will require developments that may result in light pollution to incorporate appropriate design and energy saving measures in order to minimise the potential for light pollution. Planning permission will not be granted for light generating development proposals that may have an adverse impact on residential developments, amenity, wildlife, biodiversity and highway safety. The Council will require a lighting impact assessment to accompany an application for development proposals that may cause unacceptable light pollution for residents, businesses or the environment.

Development of Land Affected by Contamination

8) The Council will ensure that where development is proposed on land that may be affected by contamination, the applicant must undertake appropriate risk assessment and if necessary, remediation to ensure the development is safe or will be made safe for its intended use and should be carried out by a competent person. Through the incorporation of mitigation measures, treatment to reduce contamination or remove pollutant pathways and soil/ground gas/groundwater remediation initiatives, receptors exposure to land contamination will be minimised.

9) The Council will:

i) Require development proposals to be accompanied by an assessment of risk from contamination where the development is on or adjacent to previous industrial uses or other land known to be affected by contamination, or in all cases where the proposal is for new housing or other forms of development which are particularly sensitive to contamination.

ii) Impose conditions on planning permissions requiring appropriate investigation and remediation of contamination before development can proceed. This will also include conditions at sites affected by land contamination to ensure verification of remediation is completed to a sufficient standard.

iii) Require applicants to demonstrate the investigation and remediation of contamination has been carried out appropriately to a standard sufficient to enable the development to be safely occupied.

10) Planning permission will not be granted for proposals where the risk to existing receptors and/or future occupiers from land contamination is unacceptable and cannot be appropriately and effectively mitigated.

Definitions

7.36 Air Quality Management Area (AQMA): The area within the Borough where the national air quality objectives[63] are not likely to be achieved, as declared to Defra. Spelthorne currently has a Borough wide AQMA for nitrogen dioxide.

7.37 Point sources of air pollutant emissions: Point sources of air pollutant emissions are stationary locations from which pollutants are discharged such as a chimney or flue. Examples include centralised boilers and Combined Heat and Power units.

7.38 Land affected by contamination: The terminology within policy E3 refers to land affected by contamination which is reflected in Government guidance[64]. "Land affected by contamination" or "land contamination", are used to describe the much broader categories of land where contaminants are present but usually not at a sufficient level of risk to be contaminated land[65]. As such, the Council/planning regime will require development of land affected contamination to follow a higher standard of remediation which is in line with best practice guidance from government. Government guidance states that organisations must use other regimes above Part 2A where contaminants are present to resolve land contamination. After carrying out the development and commencement of its use, the land should at a minimum not be capable of being determined as contaminated land under Part 2A of the EPA 1990 (NPPF 2021, paragraph 183b), and must be deemed suitable for use in line with best practice guidance.

[63] https://uk-air.defra.gov.uk/assets/documents/National_air_quality_objectives.pdf
[64] MHCLG (2014). Land affected by contamination guidance. Available from: https://www.gov.uk/guidance/land-affected-by-contamination
[65] Defra (2012) Environmental Protection Act 1990: Part 2A - Contaminated Land Statutory Guidance. Available from https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/223705/pb13735cont-land-guidance.pdf#:~:text=The%20Part%202A%20regime%20is%20one%20of%20several,or%20where%20action%20is%20taken%20independently%20by%20landowners.

7.39 Competent person: Able to undertake a risk assessment and any subsequent remediation strategy as set out within the NPPF para 183(C)

7.40 The other term “contaminated land” has a specific legal definition under Part 2A Section 78A (2) of the Environmental Protection Act (EPA)1990. The thresholds for contamination are less stringent under Part 2A standards than under best practice guidance that is applied through planning regime.

Reasoned Justification

7.41 National policy states that planning policies and decisions should contribute to and enhance the natural and local environment by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate (NPPF 2021, paragraph 174).

7.42 Whilst some polluting activities are controlled through legislation, the planning system has a complementary role in directing the location of development that may give rise to pollution where a separate pollution control regime does not apply, both pollution directly generated from the development or indirectly, for example through the traffic a development generates. The NPPF 2021 is clear that the impact of pollution is a material planning consideration.

7.43 National policy requires planning policies and decisions to take into account the likely cumulative effects of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development (NPPF 2021, paragraph 185 and 186).

Air Quality

7.44 Air Quality is an important environmental issue for Spelthorne and the Council is working towards meeting the World Health Organisation Air Quality Guidelines. The Council’s Air Quality Action Plan designates the whole Borough as an Air Quality Management Area (AQMA). This reflects that the whole Borough has a particular need to improve air quality therefore the Council will ensure that any new development in the Borough is consistent with the local Air Quality Action Plan and the requirements of national policy for planning decisions to sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the AQMA and cumulative impacts (NPPF 2021, paragraph 186).

7.45 Road traffic has been identified as the biggest single contributor to poor air quality in Spelthorne and results in other adverse environmental and health effects. Transport modelling and highways data suggest that the main road corridors are the worst affected areas. Some areas in the Borough with poor air quality where nitrogen dioxide (NO_2) concentrations are in excess of national standards remain notably alongside the A308 at Sunbury Cross and the A30 at the Crooked Billet roundabout. The level of particulates (known as PM_{10} and $PM_{2.5}$) is also a concern adjoining the M25 and Heathrow Airport.

7.46 Like every other authority, the Council has a statutory duty to work towards the Government's air quality standards. What is worthy of note is that, though the Council has little or no influence over traffic, there is scope to reduce reliance on cars and trips that have origins or destinations within Spelthorne to ensure that air quality impacts are kept to a minimum. The Council with other stakeholders, will develop and implement a strategy to decrease the reliance on cars, promote sustainable modes of transport and reduce congestion and environmental impacts. The Council will ensure that there are mechanisms such as additional Air Quality monitoring stations in the Borough to capture current levels and to assist in managing air quality improvements. Also, the Council will require an 'air quality assessment' to be undertaken where the development proposed meets the criteria given in Policy E3. National policy requires that the Council to take into account the impacts of particulate levels with regard to public health, developments meeting the criteria for an air quality assessment should ensure that the impacts of particulate emissions (both PM_{10} and $PM_{2.5}$) are considered within the assessment alongside the impacts of NO_2. Where an air quality assessment is required the impacts of the construction, demolition and earthworks process and the impacts of construction traffic upon local air quality should also be assessed in line with best practice guidance to ensure that any significant effects are appropriately mitigated against, for the prevention of pollution.

7.47 Individual developments are often shown to have a very small air quality impact. The cumulative impact of many individual schemes, deemed insignificant in themselves, can contribute to a 'creeping baseline'. Therefore, good practice to reduce emissions and exposure should be incorporated into all developments* at the outset, at a scale commensurate with the emissions. Consideration of air quality neutrality should focus on both NO_x, and PM_{10} emissions, the energy sources used within buildings and emissions from the vehicles associated with use of the development. Mitigation measures to reduce emissions may be applied on-site or off-site however the exposure of residents to poor air quality my still result in refusal without sufficient mitigation in order to protect public health.

7.48 In many cases, the impact of the development being assessed will have a cumulative effect with other planned developments, which may or may not have planning permission. Where these developments have been granted planning permission and are therefore 'committed' developments, their impacts should be assessed cumulatively with those of the application site and incorporating traffic growth predictions on the highway network**.** The contribution of these committed developments should be accounted for in the 'future baseline', provided that their contributions can be quantified. It is difficult to include other planning applications yet to be determined, as the outcome is not certain – the number and type of traffic movements may not be quantifiable, and the site layout and end users may be unknown. Circumstances with scenario assessment for proposed development without planning permission will be rare.

7.49 In some circumstances, there will be an existing permission for development on the site that has not yet been exercised. In the planning system, the estimated emissions from the existing permission could be considered as part of the future baseline and thus a revised application for the site would give rise to an incremental change emission from that associated with the extant permission. The Council's approach, in line with best practice guidance, is that impacts be assessed for the new permission sought against the current baseline for the site, disregarding the extant permission; this will reflect the 'real world' increase experienced by receptors.

Water Quality

7.50 The Borough's surface and ground water resources are extremely important for a range of uses and consumers including domestic, commercial, industrial and agricultural. The water industry is a major user of land in the Borough with four large reservoirs: the Queen Mary, Wraysbury, King George VI, Staines North and Staines, and treatment works at Ashford.

7.51 Due to the Borough's proximity to the River Thames, a significant area is at risk from flooding, with Staines and Shepperton being the worst affected areas. Also, the Borough's ground water is particularly susceptible to pollution from contaminated run-off, storm sewerage and misconnections of sewerage to surface water drains. As such, there is the need for practical measures to be taken to protect, restore and enhance the quality of the Borough water resources and its water features without compromising sustainable development.

7.52 Therefore, the Council in conjunction with the Environment Agency will seek to resist any development proposal that threatens water quality but will support initiatives that result in improving water quality and the capacity of surface water to support wildlife. As stipulated in the European Water Framework Directive, the Council will also ensure that the Borough's waterbodies achieve good ecological status and protection for drinking water sources and protected sites such as Sites of Specific Scientific Interest.

7.53 The possibility of adverse impacts on water quality and the impact of any possible discharge of effluent or leachates which may pose a threat to surface or underground water resources directly or indirectly through surrounding soils depends on the nature and scale of the development proposed as well as the local topography, the size and sensitivity of the water body. Therefore, risks to water quality will need to be considered on a case-by-case basis and in consultation with the Environment Agency where a development could impact upon groundwater sources and water quality.

Noise

7.54 Some parts of the Borough suffer from high levels of noise, particularly due to Heathrow Airport and road traffic. There are also high noise levels close to the motorways, trunk roads and other major roads such as the A308. Where noise sensitive development, including housing and schools, are proposed in these areas sound attenuation measures will be required to ensure an acceptable environment is created for residents of the development. Applicants should seek advice from the Council's Environmental Health team to ensure that the need for assessments and the appropriate level of detail is established at an early stage. The extent of aircraft noise from Heathrow is indicated by noise contours which are shown on the Policies Map.

7.55 Noise sensitive uses proposed in areas that are exposed to noise from existing or planned industrial or commercial sources, will only be permitted where future users will not be exposed to an unacceptable noise impact that would result in creation of a statutory nuisance. Noise generating development will be permitted where it can be demonstrated that any nearby noise sensitive uses (as existing or with planning permission), will not be exposed to noise impact that will adversely affect the amenity of users of surrounding noise sensitive premises. In urban areas the density

of industrial plant and air handling units (including kitchen extracts, air-conditioning units and refrigeration plant) has a cumulative effect of increasing the overall background noise level. To prevent this level continually increasing to the detriment of the local residential amenity in those locations there will be an expectation that all new noise sources would operate at a Rating Level (BS4142) of 10dB below the background noise level measured as a LA90.

7.56 Noise pollution from Heathrow Airport is of particular concern to the Council as the airport is close to major built up areas which means a large number of people in the Borough suffer noise disturbance from aircraft using the airport. Approximately, 300,000 people are affected by aircraft noise from Heathrow as defined by the 57 fb LAeq noise contour. In Spelthorne the worst affected areas are in the north of the Borough in Stanwell and Stanwell Moor.

7.57 The phasing out of noisier aircraft has led to some reduction in noise disturbance but the potential gains have not been fully realised because of a continuing upward trend in the total number of aircraft movements. Night flights are also a potential source of great disturbance to communities. The Council will continue to support controls on night flying that achieve a progressive improvement in the night noise climate, including a limit on the total number of night flights. The Council also supports the retention of noise preferential routes, aimed at ensuring flights are concentrated over more sparsely populated areas, and the maintenance of controls that limit ground noise at the airport.

Light Pollution

7.58 National policy requires planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation (NPPF, paragraph 185, c).

Development of Land Affected by Contamination

7.59 This policy seeks to ensure land which is likely to be affected by contamination is safely developed and is suitable for the proposed use.

7.60 Less stringent pollution control and less careful site management in the past has led to a substantial legacy of sites that may be subject to contamination by former land uses. In particular, large areas of the Borough have been worked for minerals and the land subsequently filled. Although much of this activity has been on land within the Green Belt, many old sites are now occupied by, or are close to housing and commercial developments. These pits were filled long before any controls existed on waste disposal and, together with former industrial sites, now present a range of unknown contamination issues which need to be addressed. Contaminants may also be present on land where there are no specific records of contaminating uses, such as in made ground where unsuitable fill has been used. The Council's principal mechanism for dealing with land affected by contamination is to ensure that land is fit for purpose when being redeveloped through the planning system. This is the most cost effective and sustainable way forward.

7.61 A fundamental principle of sustainable development is that the condition of land, its use and its development should be protected from potential hazards. Failing to deal adequately with contamination could cause harm to human health, property and the wider environment. Where development is proposed, the developer is responsible

for ensuring that development is safe and suitable for use for the purpose for which it is intended. A potential developer will need to satisfy the Council that unacceptable risk from contamination will be successfully addressed through remediation without undue environmental impact during and following the development. The developer is also responsible for ensuring submission of adequate site investigation information and comprehensive risk assessment, prepared by a competent and Suitably Qualified Person (SQP) (whom holds a recognised and relevant qualification) with demonstrable experience in the assessment and remediation of contaminated land).

7.62 Failure to provide sufficient information, according with best practice guidance, may result in permission being refused and/or is likely to result in delays in clearance of planning conditions and unnecessary cost implications. Prior to implementation of remediation, a remediation method statement will be required to be agreed with the Council. Following any remediation evidence must be provided demonstrating that remediation has been carried out in accordance with the agreed remediation strategy (with full justification if any deviations from the strategy (that have not been agreed) have been made and that the site is suitable for the proposed use.

7.63 As a minimum, after carrying out the development and commencement of its use, the land should not be capable of being determined as contaminated land under Part IIA of the EPA 1990 (NPPF, para 183b) and must be deemed suitable for use in line with best practice guidance.

Monitoring Indicators

Indicator	Target	Data source
Number of monitored sites exceeding the annual air quality objective for nitrogen dioxide (40ug/m^3)	Reduce annual mean nitrogen dioxide levels to below (40ug/m^3) at monitored sites	The Borough Council, Surrey County Council, National Highways
Net additional dwellings permitted within 66 Leq and above noise contour.	No new dwellings should be permitted within the 66 db. LAeq noise contour	The Borough Council
No applications should be allowed, contrary to Environment Agency advice, development which would threaten water quality.	Development not to have unacceptable risk to water quality	The Borough Council Environment Agency

Key Evidence

- Air Quality Action Plan 2005 http://www.spelthorne.gov.uk/article/18107/Contaminated-land-information
- Air Quality Annual Status Report 2020 www.spelthorne.gov.uk/article/18107/Contaminated-land-information
- Contaminated Land Inspection Strategy 2017 www.spelthorne.gov.uk/article/18107/Contaminated-land-information

E5: Open Space and Recreation

Existing open space, sport and recreation facilities

1) The Council will seek to protect, maintain and enhance existing open spaces, sports facilities and areas for recreation and encourage quality and accessibility improvements. Priority will be given to areas where specific deficiencies in access or quality have been identified.

2) Applications for development that would result in the loss, displacement or change of use of existing open space, sports and recreational buildings and land, including playing fields, will be determined in accordance with national policy.[66]

Provision of New Open Space and Financial Contributions

3) Proposals for new residential development will be expected to make on-site provision for open space, having regard to the standards as set out in the most up-to-date Open Space Assessment. The Council will negotiate on site-by-site basis the typology of any open space provision.

   (a) Proposals delivering on-site provision will ensure appropriate long-term stewardship arrangements are in place to secure the quality of the open space in perpetuity[67].

   (b) The Council will consider an off-site financial contribution to improve the quality of existing Council owned open spaces within a reasonable proximity to that development site where:
      i) it is demonstrated that it is not feasible or viable to incorporate on-site provision of open space; or
      ii) where the evidence indicates a demonstrable need for improvements to the quality of existing provision, as highlighted by the most up to date Open Space Assessment and/or other relevant documents.

4) Proposals for new open space delivered separately from development should be firstly directed to areas where there are deficiencies of such space as identified within the most up-to-date Open Space Assessment and Playing Pitch Strategy and/or other relevant documents.

Local Green Space

5) The Council will give protection to spaces designated as Local Green Space and development will only be permitted where very special circumstances can be demonstrated which outweigh the harm.

[66] NPPF (2024), paragraph 104
[67] As set out in Policy E1: Green and Blue Infrastructure

Definitions

7.64 Open Space is defined as all types of spaces, including areas of water such as rivers, lakes and reservoirs, which provide areas for sport and recreation and can act as amenity value. This includes, but is not limited to, playing pitches and fields, recreation grounds, parks and gardens, allotments and natural spaces such as common land.

7.65 The Open Space Assessment provides a qualitative and quantitative audit of publicly accessible open space in the Borough. This assessment (or any successor document) should be used as the starting point when considering open space requirements for new developments. The Playing Pitch Strategy will provide a robust and up-to-date assessment of the need for playing pitches in Spelthorne as well as identifying opportunities for new provision.

Reasoned Justification

7.66 Open Space is important due to the positive contribution it makes to the character of settlements and health and social well-being.

7.67 Open Space forms the basis of the Borough's green infrastructure network supporting residents and other users. Therefore, it is considered that cumulatively, these spaces form valued assets of strategic importance which should be protected as a priority. Open spaces within urban areas provide relief from the urban environment for residents. Urban open spaces also provide breaks in the built environment. Policy E5 identifies all open space within urban areas as open space for the purposes of this policy and the protection afforded to these.

7.68 The NPPF in paragraph 98 states that access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities and opportunities for new provision.

7.69 Given the importance of these spaces, there is justifiable reason for the inclusion of a policy which seeks to protect existing provision as a minimum and ensure provision of spaces in which there are identified deficiencies over the plan period.

7.70 The NPPF allows for the designation of land as Local Green Space (LGS) through the preparation of the Local Plan. The designation is suitable for spaces of particular local significance or have community value. The Council has undertaken an assessment to identify potential Local Green Space (LGS) in consultation with the local community.

7.71 By designating as LGS spaces will be protected from development in a manner which is consistent with Green Belt policy. Open spaces which do not meet the requirements of the LGS designation will be protected through Policy E5. Those spaces designated as LGS are shown on the Policies Map and are listed within the Local Green Space – review of sites.

Monitoring Indicators

Indicator	Target	Data Source
Quantity of open space	No loss of open space, identified deficiencies met by end of plan period	Planning applications and appeals Open Space Assessment and Playing Pitch Strategy
Quality of open space	Identified deficiencies met by end of plan period	Open Space Assessment and Playing Pitch Strategy

Key Evidence

- Open Space Assessment (2019)
- Playing Pitch Strategy (2019)
- Local Green Space Assessment Methodology (2019)
- Local Green Space Assessment – Review of sites (2022)

8. Economy

8.1 Economic performance is an important indicator of the 'health' of the Borough. Ensuring the vitality and viability of Spelthorne's centres and shaping these to be appealing places for local residents and visitors to access for shopping, leisure and entertainment purposes remains a key strand of the Local Plan. The Borough's location provides a strong basis for attracting visitors and new businesses. Providing a diverse mix of business and facilities enhances the attractiveness of these centres and provides for the needs of local people within their communities and employment opportunities for a wider population.

8.2 The Borough provides a home to major companies such as Shepperton Studios and BP, which are valuable contributors to providing local employment opportunities and supporting the local economy. Retaining these and identifying suitable locations for other high-profile companies to locate in Spelthorne, are important parts of the Borough's economic and employment performance.

Meeting Employment Needs

8.3 The Employment Land Needs Assessment[68] is based on economic forecasts which estimate the growth in jobs in different sectors and translates this into an estimate for change in employment floorspace over the plan period. Changes in office, industrial and storage/warehousing floorspace are considered.

Use Class	Required change in floorspace 2022-2037 (sqm)
E (g) (i and ii)	18,372
B2	-11,268
B8 (general)	12,005
Total B Class	**19,109**

8.4 The COVID-19 pandemic has resulted in a change in the working patterns of many people and the extent to which these changes become permanent is not yet clear. Some employers are likely to make more flexible or hybrid working practices permanent with smaller office spaces needed. Some occupiers are likely to be reviewing their space needs particularly in light of the financial difficulties and uncertainties businesses face around COVID-19 and BREXIT. Whilst it is too soon to quantify the impact on future need, this highlights the need for flexibility to enable businesses to adapt to meeting changing market conditions and achieve innovations. For this reason, it has been decided flexibility and frequent review is required with the floorspace needs.

[68] Refers to both 2018 and 2022 update, both produced by Spelthorne BC

EC1: Meeting Employment Needs

1. Economic growth in Spelthorne will be supported by maintaining and intensifying the use of the Borough's employment floorspace offer. This will be done by;

    - safeguarding employment land,
    - provision of new floorspace in line with needs identified through the most up to date evidence and
    - encouraging its innovative re-use in ways that better meet the needs of the market, whist remaining within employment use.

    This will accommodate the predicted future growth in jobs in the Borough required to help to secure sustained growth of the local economy.

2. To support the retention, creation and development of local businesses, promote business competitiveness and allow for flexibility to cater for the changing needs of the economy, the Council will support:

    (a) proposals to redevelop outmoded employment floorspace to cater for modern business needs;

    (b) proposals which will deliver high quality, well-designed, flexible and adaptable spaces of different unit sizes and types for a range of uses and occupants

    (c) proposals which will deliver smaller and incubator units, flexible workspaces for co-working, managed workspace and serviced office accommodation and

    (d) the provision of essential ancillary employment facilities close to places of employment.

    in the most sustainable locations, in particular in town and local centres.

3. Proposals should seek to incorporate sustainability measures, including but not limited to sustainable design, construction and carbon/energy demand reduction measures to ensure that economic development is of a high standard.

    Strategic Employment Areas

4. The five designated employment areas (as shown on the Policies Map that together make up the Borough's current core supply of employment land will be protected as Strategic Employment Areas and changes of use of land and/or buildings from employment to non-employment use will be resisted. The refurbishment and redevelopment of sites in these areas for employment use, and proposals for the intensification of sites for employment use will be permitted.

    - Bedfont Road, Stanwell
    - BP, Chertsey Road, Sunbury
    - Hanworth Road
    - Shepperton Studios (is the preferred location for new film and television studio related-use)[69]
    - Windmill Road, Sunbury

[69] Shepperton Studios is not a preferred location for new office and R&D floorspace.

5. Redevelopment or change of use to a non-employment use will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use for a continuous period of at least 24 months for a Strategic Employment Site prior to submission of a planning application.

Office and Research & Development

6. Proposals for new office and research & development (E (g) (i and ii)) floorspace will be directed sequentially to Staines-upon-Thames town centre and the Strategic Employment Areas. Only if sites cannot be found in these locations should the edge of centre sites and locations within 500m of a public transport interchange be considered.

Industrial, Warehousing and Storage

7. Proposals for new industrial, warehousing and storage (B2 and B8) floorspace will be directed to the industrial Strategic Employment Areas, to any of the existing industrial estates and to any sites where floor space of this use class is included in the site allocation in the Local Plan.

Outside of the Designated Employment Sites

8. Outside of the designated employment sites, employment floorspace will be protected in line with the latest Employment Land Needs Assessment and the loss will be resisted unless the site is having significant negative impact on residential amenity.

9. Redevelopment or change of use to a non-employment use will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use for a continuous period of at least 24 months prior to submission of a planning application. If the site is allocated for an alternative use within the Local Plan, evidence of marketing will not be required.

Heathrow

10. The Council provides in-principle support for a future expansion of Heathrow Airport, (as set out in Policy SP7) if it is undertaken in a sustainable and integrated way.

Definitions

8.5 Active and comprehensive marketing requires demonstration of a marketing campaign for a continuous period of at least 24 months. Marketing must be undertaken through a recognised commercial agent at a price that genuinely reflects the market value of the current or most recent use of the site. It must be demonstrated to the Council's satisfaction that marketing has been unsuccessful for all relevant floor space proposed to be lost through re-development or change of use.

8.6 Transport interchanges are defined as rail stations and bus stations within the Borough and are shown on the Policies Map. The 500m catchment around each interchange are shown on maps. The transport interchanges are:

- Ashford rail station
- Shepperton rail station

- Staines bus station (rear of Elmsleigh Centre)
- Staines rail station
- Sunbury rail station
- Upper Halliford rail station
- Kempton Park rail station

8.7 Transport interchanges do not include standalone bus stops.

Reasoned Justification

8.8 The NPPF is clear that there are three dimensions to sustainable development, one of which is economic. One of the roles of the planning system is to contribute to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity.

8.9 Our Corporate Plan (2021-2023) has five priorities including the support and guidance to residents and businesses to help them to recover from the economic impact of the COVID-19 pandemic. The Council will support economic recovery by:

- Minimising unemployment
- Developing skills and getting people back in work
- Assisting future business growth and adaptation
- Placemaking, regeneration and developing infrastructure
- Attracting visitors to the Borough

8.10 The Employment Land Needs Assessment (ELNA), identified a need for a fairly small additional amount of floorspace over the plan period in order to meet the anticipated level of jobs which will be created. Meeting this will meet the identified local Spelthorne need. We are keen to gain from the economic benefits that our close proximity to Heathrow brings.

8.11 Spelthorne has significant strengths with a large business base and a wide range of business sectors represented, including a significant presence of businesses of national and international renown. This is further strengthened by its proximity to Heathrow Airport and its good communication links to London and the rest of the UK. It has a significant retail sector which is focussed largely on meeting the needs of local residents. The Enterprise M3 Town Analysis (Dec 2019) highlighted Staines as:

- A relatively high concentration of employment in Information & Communications, with a Location Quotient of more than 2.0 in this sector i.e. more than double the national average concentration of employment in this sector.
- Strategic Economic Plan (SEP) identifying Staines as step-up town
- Productivity Index of 1.02
- Employment ratio of 0.55 (value for the UK is 0.46)

8.12 In March 2021, the Government launched a Build Back Better Plan, it's plan for growth focused on three pillars of investment to act as the foundation which to build economic recovery- high quality infrastructure, skills and innovation. The Spelthorne Economic Strategy was refreshed in February 2020. It builds upon the first 3 years of the 2017-2022 Economic Strategy and continues to focus on prioritising the key needs for businesses to settle, grow and thrive. Through the strategy the Borough aims to realise its ambitions and release its potential as a leading economy not just in Surrey but the wider sub-region. The four new themes of the Economic Strategy are ideas, people, business environment and infrastructure and places.

8.13 Spelthorne possesses the foundations envied by other locations, particularly given its proximity to London and Heathrow, forming part of a powerful functional economic area. The M3, M4 and M25, which help drive the prosperity of the south east, all run through or are in close proximity to Spelthorne.

Monitoring Indicators

Indicator	Target	Data Source
Net change in permitted and completed E (g) (i and ii)B2 and B8 floorspace (sqm) in the Borough	Net increase of 18,372 sqm E (g) (i and ii) use class floorspace by 2037. Net increase of 12,005 sqm completed B8 use class floorspace by 2037. Net reduction of around 11,268 sqm of B2 floorspace by 2037.	Planning applications and appeals and building completions data
Amount of employment floor space (sqm) lost to non-B class uses	N/A	Planning applications and appeals and building completions data
Additional number of employee jobs (total and by industry) in the Borough	900 additional B class jobs to 2037	Published data e.g. ONS Business Register Employment Survey (BRES)

Key Evidence

- Employment Land Needs Assessment (Spelthorne Borough Council, 2018)
- Employment Land Needs Assessment Update (2022)
- Spelthorne Local Economic Assessment, 2016
- Spelthorne Economic Strategy 2017-2022 – 2020 refresh
- Spelthorne Corporate Plan 2021-2023
- A Strategic Economic Plan for the Enterprise M3 Area 2018-2030 (enterprise M3, available online at: https://enterprisem3.org.uk/sites/default/files/2019-06/Enterprise%20M3%27s%20Strategic%20Economic%20Plan%202018-2030.pdf)
- Our Local Industrial Strategy – Defining Our Approach (2020) – (Enterprise M3, available online at: https://enterprisem3.org.uk/sites/default/files/2020-

02/EM3_LIS_Defining%20Our%20Approach_0.pdf)

EC2: Retail

1) The Council will seek to meet identified retail needs within the Borough through maintaining and enhancing the vitality and viability of Staines-upon-Thames, as the main town centre and Ashford, Shepperton and Sunbury Cross as the Borough's district centres. Staines -upon-Thames will be the primary location for main town centre uses.

Locations for Development

2) The Council will ensure that Staines-upon Thames will be the preferred location for the development of main town centre uses[70], including retail.

3) Retail proposals in Ashford, Shepperton and Sunbury Cross will be supported where the scale and design of the proposal is considered appropriate to the existing character and supports their role as district centres.

4) The Council will support development which improves the viability and vitality of shopping parades within the Borough which support their local communities and where the scale and design complements the existing character

5) Proposals for main town centre uses that are located outside Staines-upon-Thames and Ashford, Shepperton and Sunbury Cross will be subject to the sequential test as set out in the NPPF. In this instance, the applicant will have to demonstrate that:

   (a) The proposal satisfies the sequential test and flexibility has been demonstrated on issues such as format and scale.
   (b) For retail proposals which exceed 500 sqm, a retail impact assessment is required to be undertaken to ensure that there are no adverse impacts on existing retail uses in the Borough's centres as set out in the NPPF.
   (c) Edge-of-centre[71] and out-of-centre sites, which satisfy the sequential test, should be accessible including by public transport, bicycle and foot and well-connected to the centre.

Primary Shopping Areas

6) Proposals for development within the Primary Shopping Areas will be permitted where they improve the quality and mix of uses within Class E to enhance the role of the centres and their vitality and viability and to a scale which complements the local character.

[70] Main town centre uses are defined in the NPPF as retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars, pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, cultural and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

[71] Edge-of-centre locations are defined for retail purposes, as a location that is well connected and within 300 metres of the PSA. For all other main town centres uses, it is a location within 300 metres of a town centre boundary, however for office development this includes locations outside of the town centre but within 500 metres of a public transport interchange. Local circumstances should be taken into account when determining whether a site falls within the definition of edge-of-centre

7) Appropriately designed and located proposals for residential development on upper floors will be encouraged, provided the scale complements the prevailing character and is acceptable against all other policy.

Opportunities

8) Improve connectivity for pedestrians by enhancing the public realm within the district centres. This can also support new cycling infrastructure and to enhance the local area. Improved connectivity and utilising sustainable and active travel modes can also assist in establishing 20-minute neighbourhoods, particularly within the district centres.

9) Improve accessibility of existing parking for users of shopping areas to encourage footfall, where appropriate, and identify suitable locations for the implementation of EV charging points for electric vehicles

Definitions

8.14 Primary Shopping Areas: Defined area where retail is concentrated shown on the Policies Map.

8.15 20-minute neighbourhoods: Compact and connected neighbourhood, where people can meet their everyday needs within a short walk or cycle which presents multiple benefits including boosting the local economy, improving people's health and wellbeing, increasing social connections and tackling climate change.

Reasoned Justification

8.16 Spelthorne Borough Council have defined a hierarchy of centres as required by the NPPF and will seek to promote their long-term vitality and viability. Staines-upon-Thames is the Borough's main town centre, where main town centre uses should be directed principally. Ashford, Shepperton and Sunbury Cross are district centres which act as key providers for their respective catchments. As such, the Council will ensure that identified retail needs, as well as those of other main town centre uses, will be met using the centre hierarchy.

8.17 Paragraph 86 of the NPPF (2021) states that LPAs should set out policies that allow centres to grow and diversify in a way that can respond to rapid changes in retail and leisure industries. LPAs should define the extent of the centres and primary shopping areas. Paragraph 86 also states that policies should retain and enhance existing markets and where appropriate, re-introduce or create new ones.

8.18 Changes to the Use Classes Order means that approaches previously proposed in regard to ensuring sufficient numbers of shops under Use Class A1 are no longer practical. Shops, offices, restaurants and cafes are all now under Use Class E, along with many other different uses. This means that to move between these uses, planning permission is not required. This means that the market now effectively takes precedence over the planning system for the management of shopping areas and high streets.

8.19 From 1 August 2021, the Government have introduced changes to the General

Permitted Development Order (GDPO) through the use of extended permitted development rights (PDR). These changes make it possible for uses with Class E, to be converted into residential use (Class MA) without planning permission. To do so, a prior approval is required from the Local Authority however these are limited in their scope for dealing with possible consequences of losing retail units and other commercial premises to residential use on the high street.

8.20 As a result of increased competition from online retailers and increasing flexibility in respect of changes of use introduced through amendments to the General Permitted Development Order (GPDO), there is an increased risk of the reduction in numbers of retail units within all centres of different scales in the Borough. The Council will ensure the retention of as many retail units within the centres as possible, within the scope of the current GDPO. Retaining retail units will secure the centres as shopping destinations and to ensure, in the case of the local centres, that they continue to provide for the day-to-day needs of their populations and achieve high footfalls.

Monitoring Indicators

Indicator	Target	Data Source
Number of ground floor retail (E) uses lost to other use classes within the Primary Shopping Area	N/A	Annual retail surveys
Permissions granted for retail uses (E)	None	Annual retail surveys, planning applications and appeals
Permissions granted for change of use from E to other uses that would result in a net loss of retail uses in a Primary Shopping Area	None	Planning applications and appeals.

Key Evidence

- National Planning Policy Framework (NPPF) 2021
- Planning Practice Guidance Town Centres and Retail
- Retail and Town Centre Study 2015
- Retail and Town Centre Study Update 2018
- Spelthorne Annual Retail Surveys (summarised in the AMR (available online Authority Monitoring Report - Spelthorne Borough Council)

EC3: Local Centres, Shopping Parades and Isolated Retail Units

Strategy

1) Spelthorne has several local centres and a series of shopping parades located across the Borough. These centres and parades vary in size and are generally located in more isolated parts of the Borough and serve some of the day to day needs of their respective communities. Given the isolated nature of these retail units, ensuring their continued viability is important to support their communities.

2) Local Centres

- Charlton
- Laleham
- Lower Sunbury
- Upper Halliford

3) Shopping Parades;

- Clare Road, Stanwell
- Convent Road and Feltham Hill Road junction, Ashford
- Edinburgh Drive, Staines
- Feltham Road, Ashford
- Green Lane, Shepperton
- Green Street, Sunbury
- Groveley Road, Sunbury
- Laleham Road, Shepperton
- Stainash Parade and The Broadway, Kingston Road, Staines
- The Avenue, Lower Sunbury
- Staines Road West, Ashford
- Vicarage Road, Sunbury Common
- Victoria Parade, Kingston Road, Staines
- Woodlands Parade, Ashford Common

4) The Council will seek to protect the role that the local centres and shopping parades play in providing for local retail and other service needs of the community. Development proposals for retail (use class E) will be supported, where the scale is considered to complement the needs of the communities.

5) Development proposals (new and change of use) for other town centre uses will also be supported, provided they maintain;

(a) an active frontage
(b) the overall role of the centre in meeting day-to-day retail needs
(c) customer choice
(d) the vitality and viability of the centre or parade and;
(e) the scale and function of the centre

6) The Council will resist the loss of isolated retail units given the role they play in supporting communities. This will act as a 'last shop in the village' to maintain the provision of such units in these communities. The loss of a retail unit (use class E) that provides for everyday needs, will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use for a minimum of 24 months, prior to the submission of a planning application.

7) Proposals for residential development on the upper floors, which will enhance the local vitality, will be considered positively, provided the proposals maintain or enhance the local character and comply with all other policy objectives.
Opportunities

8) On shopping parades, the Council will support opportunities to improve the relationship between the shopping area and the attractiveness of the shopping area and its connection to the wider local environment including public realm and landscaping.

9) The Council will support proposals to improve connectivity, particularly in encouraging the use of active and sustainable modes of travel and the infrastructure to support these such as improved pedestrian walkways and cycle lanes, as well as improved bus services. This provides the opportunity to promote the 20-minute neighbourhood principles.

Definitions

8.21 Local centres are smaller areas of housing with some retail use to help meet the day-to-day needs of the area. These centres are generally located in more remote locations and are less well connected to either the main town centre or the three district centres.

8.22 Shopping parades are rows of shops providing a variety of facilities for their local neighbourhood. These parades can be of varying sizes but generally help to contribute to meeting some or all of their local communities' everyday needs. The list provided in the policy is not exhaustive and all parades will be shown on the forthcoming policies map.

8.23 Active and comprehensive marketing requires demonstration of a marketing campaign for a continuous period of at least 24 months as a minimum. Marketing must be undertaken through a recognised commercial agent at a price that genuinely reflects the market value of the current or most recent use of the site. It must be demonstrated to the Council's satisfaction that marketing has been unsuccessful for all relevant floor space proposed to be lost through re-development or change of use.

8.24 Town centres uses are defined in the NPPF as retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

8.25 20 minute neighbourhoods are compact and connected neighbourhood, where people can meet their everyday needs within a short walk or cycle which presents multiple benefits including boosting the local economy, improving people's health and wellbeing, increasing social connections and tackling climate change

Reasoned Justification

8.26 The Borough has a number of local centres which support a smaller population when compared to the town and district centres. The local centres play an important role in supporting their communities. These centres have a few shops which help to provide for local people's basic day-to-day needs but lack the diversity of more established retailers or uses such as banking facilities, supermarkets etc. However, the role these centres play within their communities is important and maintaining the vitality of these is a key challenge. Therefore, the Council is justified in protecting these centres and encouraging the development of uses within Class E, particularly retail where appropriate.

8.27 In addition, the Borough also has a vast number of shopping parades dispersed across residential areas. These parades also play a key role in helping to support their communities where there is an absence of a district or local centre. Many of these parades provide homes for local businesses and are of importance to the communities which they serve. The Council will seek to maintain these parades to help them to continue to fulfil their functions and encourage the re-use of vacant units to ensure vitality within the parades.

8.28 Spelthorne also has a small number of isolated shops which are often on their own and provide an important service such as post office or local convenience store. As such, these units often provide for everyday needs. These units could be vulnerable to development pressures and therefore, due to the key role they play within their communities, seeking significant justification for proposals affecting these is considered necessary.

Monitoring Indicators

Indicator	Target	Data Source
Permissions granted for change of use of shops (E)	Nil	Planning applications and appeals

Key Evidence

- Spelthorne Annual Retail Surveys (summarised in the AMR, available online www.spelthorne.gov.uk/AMR
- Spelthorne Annual Monitoring Report www.spelthorne.gov.uk/AMR

EC4: Leisure and Culture

1) The Council will support proposals that deliver a high quality and diverse range of leisure and visitor experiences. It is anticipated that such proposals will increase the contribution that tourism, arts and cultural heritage make to quality of life, social and cultural well-being, economic growth and the natural environment.

2) The Council will safeguard the viability of Staines-upon-Thames and the centres of Ashford, Shepperton and Sunbury Cross by ensuring that proposals for new leisure space located outside these centres provide an impact assessment in accordance with the NPPF. Proposals should accord with the following criteria:

    (a) Proposals for leisure attractions, including arts and cultural facilities, accommodation and conference facilities will be determined in accordance with the sequential approach outlined in the NPPF, except where they apply to applications for small scale rural development. Where proposals exceed 2,500sq.m and are located outside the centres, as designated on the Policies Map, an impact assessment must be submitted.

    (b) All new, enhanced or replaced leisure and cultural attractions, accommodation and conference facilities will be required to preserve and enhance the character of the local area and be of a scale and nature appropriate to the location.

3) The loss of existing leisure attractions, including arts, cultural and entertainment facilities and hotels will be strongly resisted unless replacement facilities are proposed in a location equally accessible to the facility's current catchment area. Alternatively, robust evidence must be provided to demonstrate that:

    (a) The facility causes significant detriment to the amenity of the locality; or that

    (b) The existing use is unviable and its retention has been fully explored (including active and comprehensive marketing of the facility for its existing or an alternative leisure or cultural use for a continuous period of at least 24 months prior to the submission of a planning application)

    (c) Applications for development that would result in the loss, displacement or change of use of major indoor sporting facilities will be determined in accordance with national policy[72]

Definitions

8.29 Leisure uses include cinemas, restaurants, retail, bars and pubs, nightclubs, casinos, health and fitness centres, gyms and studios, indoor bowling centres, indoor sports provision and bingo halls. Cultural uses include theatres, museums, libraries, galleries and concert halls, hotels and conference facilities.

8.30 Active and comprehensive marketing requires demonstration of a marketing campaign for a continuous period of at least 24 months. Marketing must be undertaken through a recognised commercial agent at a price that genuinely reflects the market value of the current or most recent use of the site. It must be demonstrated to the Council's satisfaction that marketing has been unsuccessful for

[72] 'NPPF (2024) including paragraphs 98 and 104

all relevant floor space proposed to be lost through re-development or change of use.

Reasoned Justification

8.31 Leisure uses play a key role in maintaining the vitality and viability of the town and local centres within the Borough. Staines, as the main town centre, provides the primary leisure uses which include a mix of shops, restaurants and a cinema. There are also a range of sports facilities located across the Borough including the two Council-owned leisure centres in Staines and Sunbury, private gymnasiums and sports grounds to help to promote active lifestyles. The Borough also benefits from Kempton Park racecourse which offers regular race meetings as well as hosting many other activities such as antique markets and music events, therefore playing a key role in providing for leisure activities and encouraging visitors to the Borough. The River Thames and Shepperton Studios also play roles in attracting social and economic benefits and the Council should continue to benefit from these.

8.32 The Council considers that the leisure and cultural experience in the Borough has the potential to contribute to Spelthorne's future growth. As such, the Council will continue to protect existing leisure and tourism facilities. Where appropriate, new facilities will also be supported to enhance the Borough's attractiveness to its residents and visitors. The provision of arts and cultural facilities in particular can broaden the Borough's offer and increase its appeal to visitors.

8.33 The sequential testing of proposed leisure developments will help to ensure that the vitality and viability of the main town centre and the three district centres within the Borough are protected. Only where there are no town centre or edge of centre sites available will out-of-centre locations be accepted. Applicants proposing new leisure uses outside Staines-upon-Thames and Ashford, Shepperton or Sunbury Cross will be required to submit an impact assessment. The assessment should clearly identify and explain the proposed development's likely impact on the vitality and viability of the centre.

8.34 Spelthorne's proximity to Heathrow Airport, London and several large-scale tourist attractions means that there is potential for visitors to use facilities within the Borough, particularly in respect of hotels. This also presents the opportunity to enhance this provision to improve tourism opportunities within the Borough.

Monitoring Indicators

Indicator	Target	Data Source
Net change in the floorspace for leisure uses within the Borough	Increase in the leisure provision within the Borough	Planning applications and appeals Leisure study

Key Evidence

- Spelthorne Leisure Needs Assessment (2017, available online at: https://www.spelthorne.gov.uk/article/17520/Leisure-Needs-Analysis)
- Spelthorne Economic Strategy 2017 – 2022 www.spelthorne.gov.uk/econstrat
- Local Economic Assessment (2017) www.spelthorne.gov.uk/econstrat
- Surrey Hotel Futures Report (June 2015)

9. Infrastructure and Delivery

9.1 In order to support a sustainable future for the Borough, infrastructure provision is a key element in the delivery of a Local Plan. Infrastructure includes; transport and physical infrastructure (including roads and cycle lanes), social and community facilities (including schools and youth facilities) and green infrastructure (including open and green space). The Council is required to identify the infrastructure needed to support the development proposed over the next 16 years. This is done through the Infrastructure Delivery Plan (IDP).

9.2 To compile an IDP the Council undertakes ongoing engagement with providers, developers and other key stakeholders to establish the impacts of new development on essential infrastructure within the Borough. The IDP outlines any potential gaps in provision and identifies what new infrastructure is required to mitigate some of the potential effects of the levels of development being proposed. This, together with the polices in the Plan, sets out how the needs of the Borough will be met over the plan period.

ID1: Infrastructure and Delivery

1) The Council will work with infrastructure providers, developers and other key stakeholders to support the delivery of the infrastructure necessary to enable the development set out in the Local Plan. To achieve this, the delivery of development may need to be phased to reflect the delivery of infrastructure.

2) The projects required to support the Local Plan strategy are identified within the Borough's Infrastructure Delivery Plan. The Infrastructure Delivery Plan will be updated to ensure infrastructure information remains up to date and is monitored effectively.

3) Developers will be expected to engage early with the Council and infrastructure service providers to discuss their requirements.

4) Developers must demonstrate they have explored existing infrastructure capacity, and how this could be future-proofed, with appropriate providers and demonstrate that they have made sufficient provision. Where appropriate, and where there is an identified shortfall across the Borough, opportunities should be taken to maximise infrastructure provision on suitable sites.

5) Development proposals, including those allocated in this plan which give rise to a need for infrastructure improvements, will be expected to mitigate their impact, whether individually or cumulatively, and at a rate and scale to meet the needs that arise from that development or a phase of that development. The standards of infrastructure delivery will be expected to comply with other policies set out within this Plan.

6) Planning permission will be granted subject to the provision of (or appropriate funding towards) the required level of infrastructure to support the development. This will be

secured by entering into an appropriate legal agreement and/or the use of Grampian conditions[73].

7) Infrastructure identified within the Infrastructure Delivery Plan or through negotiations on individual planning applications will continue to be delivered either through on-site provision or off-site contributions and secured by s106, s278 or other appropriate agreements and the Community Infrastructure Levy (CIL) or its successor as well as other identified sources of funding as set out in the Infrastructure Delivery Plan.

8) Development proposals which rely on the delivery of critical infrastructure projects to support the development, will only be permitted prior to completion of that project or where appropriate, a phase of that project which has been identified as necessary, where the council is content that the infrastructure or phase of that infrastructure will be in place within a reasonable timetable from the date of permission.

Social and Community Facilities

9) The Council will resist the loss or change of use of existing facilities unless it can be demonstrated that:

   (a) the facility is no longer needed for its existing purpose or viable for any other social or community use;

   (b) the services can be re-provided in a facility of better quality on the same site or in an alternative location that is equally accessible to the community served; and

   (c) there is no requirement from any other public or voluntary service provider for an alternative community or social facility that could be met through a change of use or redevelopment.

Definitions

9.3 Infrastructure is a broad term and includes but is not limited to:

- Transport and physical infrastructure: local and strategic road network, cycling and pedestrian infrastructure, rail network and stations, bus services, utilities, telecommunications, flood risk minimisation, wastewater treatment.
- Social and community facilities: schools and other education facilities, health and social care facilities, libraries, museums, cultural facilities, emergency services, advice centres, clubs, public houses, societies, places of worship, sport and leisure activities, youth facilities and community centres.
- Infrastructure Delivery Plan: identifies the Borough's infrastructure requirements including social, physical and green infrastructure. The IDP sets out what is needed, where it is needed and when it is needed

[73] i.e., prohibiting development authorised by the planning permission or other aspects linked to the planning permission (e.g. occupation of premises) until a specified action has been taken (such as the provision of supporting infrastructure). Such conditions should not be used where there are no prospects at all of the action in question being performed within the time-limit imposed by the permission.

Reasoned Justification

9.4 The NPPF sets out that to deliver the social, recreational and cultural facilities and services the community needs, planning policies should plan positively for the provision and use of shared space, community facilities and local services to enhance sustainability and guard against the unnecessary loss of valued facilities.

9.5 The provision of suitable, adequate infrastructure is vital to the well-being of the Borough's population and economy. The Spelthorne Infrastructure Delivery Plan outlines the capacity and quality of existing infrastructure, including planned improvements. Growth within the Borough has often out-paced the provision of necessary infrastructure and there are parts of Spelthorne where existing infrastructure is at or near capacity or of poor quality and in need of improvements.

9.6 There may also be occasions where development proposals will require infrastructure capacity improvements before they can come forward or are reliant on critical infrastructure projects for delivery

9.7 In order to redress this, the infrastructure will be provided in a timely manner to support the new occupants and/or mitigate the impacts of the development. Where it is demonstrated that individually or cumulatively there is anticipated to be a significant impact on the existing community, development will be phased to ensure provision meets demand and needs.

9.8 Maintenance of infrastructure and expansion to meet requirements is generally the responsibility of the relevant infrastructure provider. Most providers operate to statutory requirements and have set timescales for plans.

9.9 The planning system allows the Council to ensure that there is adequate infrastructure in place to support new development. Developers, where required, will have to demonstrate that wastewater and water network capacity will be in place ahead of the occupation of development. Developers are encouraged to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Local network upgrades can take 18 months to 3 years to plan and deliver with strategic upgrades taking 3-5 years. Where there is an infrastructure capacity constraint, the Council will where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.

9.10 To ensure the scale of development set out in the Local Plan can be delivered, the impacts of the Plan policies and other requirements must be viability tested. As part of this, the Council require that these impacts and related costs are accounted for the in the price for the land (or any agreement in place to acquire the land). In line with paragraph 58 of the NPPF, applicants will be required to justify the need for a viability assessment at the application stage and these should be made publicly available.

9.11 The Council have adopted the Community Infrastructure Levy (CIL) to contribute towards funding the provision, improvement, replacement, operation or maintenance of infrastructure to support the development of its area. The Council is required to produce an Infrastructure Funding Statement to outline the Council's spending priorities.

Monitoring Indicators

Indicator	Target	Data Source
Annual CIL receipts	N/A	Annual monitoring
Annual CIL spending	N/A	Annual monitoring
Discharge of S106 obligations	To collect payments and spend as required	Annual monitoring

Key Evidence

- The Community Infrastructure Levy Regulations 2010, as amended
- Infrastructure Delivery Plan
- CIL Infrastructure Funding Statement
- Local Plan Viability Study

ID2: Sustainable Transport for New Developments

Development Proposals

1) The Council will require development proposals to incorporate opportunities to facilitate sustainable and active modes of travel. This will be achieved by:

   (a) provision of, or contributions towards, the improvement of public and community transport where identified as required;

   (b) provision of vehicle parking standards, as set out in the Council's latest Parking SPD[74], and the provision of electric vehicle charging points which are set out in the latest Surrey County Council guidance;

   (c) provision of secure, accessible and convenient on-site cycle parking as set out in the Council's latest Parking SPD;

   (d) providing improvements to or contributions towards improving the capacity and security of cycle parking at the Borough's public transport stations where identified as required;

   (e) providing funding to deliver the transport projects and highways improvements required to support the spatial strategy as set out in the Infrastructure Delivery Plan where identified as required;

   (f) providing a transport assessment and travel plan for all development proposals likely to generate significant amounts of transport movement to promote the delivery and use of sustainable transport. The Travel Plan should set out how it will facilitate the use of sustainable and active transport modes, including but not limited to; low emission car clubs, low emission employee shuttle bus schemes supporting public bus schemes or offering discounted season tickets between public transport stations and employment areas.

   (g) Requiring major transport schemes to assess the impacts on health and wellbeing in order to facilitate healthy lifestyles. Where appropriate a Health Impact Assessment will be required.

Borough-wide Sustainable Transport

2) The Council will work with stakeholders, including Surrey County Council (as the highways authority), to promote and enable schemes and development proposals which facilitate sustainable and active travel. This will include:

   (a) provision of new and accessible, safe and attractive sustainable transport networks and routes;

   (b) provision and improvement of public and community transport;

   (c) securing improvements to cycle parking at the Borough's transport

[74] A reduction of parking requirements may be appropriate in specific situations, in locations with good access to public transport and local services. Any proposed reduction will be assessed against criteria including:
a. Distance from public transport node i.e. main railway station, bus station, main bus stop;
b. Frequency and quality of train service;
c. Frequency and quality of bus service;
d. Availability and quality of pedestrian and cycle routes;
e. In line with Surrey County Council Car Club Guidance, car clubs will be encouraged for developments of 50 or more residential units.

stations;

(d) securing funding to deliver the transport projects and highways improvements required to support the spatial strategy as set out in the Infrastructure Delivery Plan.

3) The Council will use the Spelthorne Local Cycling and Walking Infrastructure Plan (LCWIP) and any successor documents, as a basis for identifying schemes to secure improvements for sustainable and active travel and future opportunities

Staines-upon-Thames

4) Development within Staines will be subject to bespoke parking standards, as set out in the most up-to-date Parking SPD, to take account of the anticipated level of development and provision of sustainable and active travel modes.

Definitions

9.12 Sustainable and active travel is defined as any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport.

9.13 Public Transport Stations are defined as rail stations and bus stations within the Borough and are shown on the Policies Map.

Reasoned Justification

9.14 The planning process for new developments provides the opportunity to maximise the use of sustainable and active travel modes such as walking, cycling and the increased use of public and community transport. This also provides an opportunity to ensure that people with disabilities can access all modes of transport. This is consistent with the NPPF. Due to the relatively small nature of the Borough, cycling has the potential to replace short car journeys. By providing safe and accessible routes this will encourage the increased use of cycles to facilitate this modal shift.

9.15 The Council will work with stakeholders and Surrey County Council as part of the forthcoming Infrastructure Delivery Plan, which will set out the key infrastructure required to support the delivery of the Local Plan, including sustainable transport and highway schemes. Growth over the Plan period will give rise to increased traffic volumes and it is therefore required that this be mitigated as far as possible. The policy sets out the measures by which the Council will seek to militate against the impacts and will require new developments to adopt the relevant standards to achieve this. Surrey County Council's 2022 Local Transport Plan 4 sets out county-wide policies on reducing transport emissions in order to help meet the county's commitment to becoming net zero by 2050. One of the primary delivery mechanisms for achieving net zero is the roll out of Local Cycling and Walking Infrastructure Plans (LCWIP). The Spelthorne LCWIP will provide a 10-year plan for the delivery of walking and cycling infrastructure within Spelthorne and seeks to deliver safe, high-quality walking and cycling environments across the Borough.

9.16 With respect to parking, the policy takes account of the NPPF in paragraph 108. The Council's standards are set out in the latest Parking Supplementary Planning Document (SPD). This allows for the setting of maximum parking standards where

there is a clear and compelling justification that they are necessary for optimising the density of development in town centres that are well served by public transport. The policy does not preclude developers from bringing forward proposals for new development that is car-free.

9.17 All developments likely to generate significant amounts of transport movement are required to submit a Transport Assessment and Travel Plan. These documents set out the potential transport impacts of the proposals, how these will be addressed and how sustainable travel will be delivered in the long term. There may be occasions where smaller developments have lower impacts and therefore a Transport Statement may be necessary unless it can be demonstrated to the satisfaction of the Council that the changes are minor. Such assessments will be subject to liaison between the Council and the highway authority or authorities.

Monitoring Indicators

Indicator	Target	Data Source
Walking, cycling. bus and rail modal share for travel to work of Spelthorne residents	Increase in modal share over time	Census – every 10 years Local surveys
Peak time traffic flows on local road networks	Decrease over the plan period	Annual average daily flow

Key Evidence

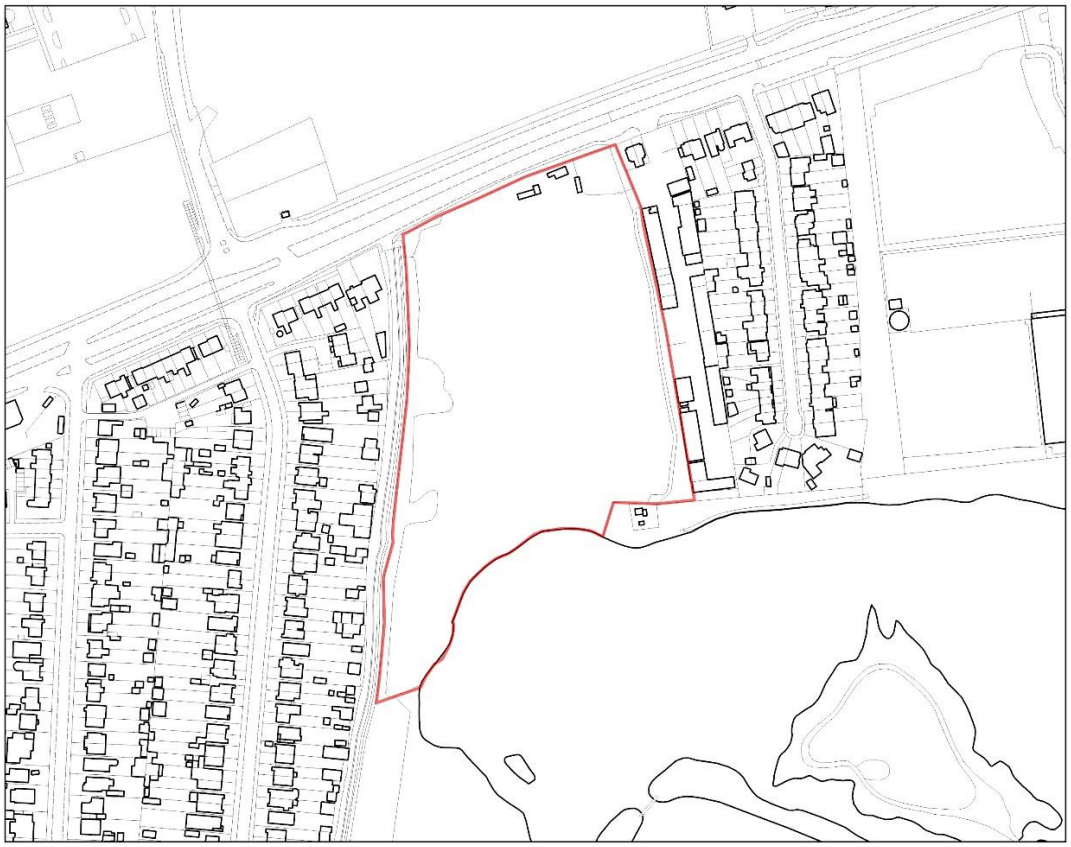
- Spelthorne Borough Council Local Plan Strategic Highway Assessment Report (Surrey County Council, 2019)
- Strategic Highways Assessment Report (Surrey County Council, 2022)
- Spelthorne Local List of Information Requirements (2015)
- Vehicle, Cycle and Electric Vehicle Parking Guidance for New Development (SCC, 2022)

10. Allocations

Years 1-5 (2024-2028)

AS2/006 (Land East of Desford Way)

Site Information	
Site ID	AS2/006
Site name/ address	Land East of Desford Way, Ashford, TW15 3FF
Site area (ha)	3.33
Location	Greenfield land Former Green Belt
Ward	Ashford North and Stanwell South
Proposed Allocation	Travelling showpeople plots: 15



Site description & existing use	The site is located on the edge of Ashford and is an undeveloped, grassed plot of land. The site is bounded to the west by residential development, to the east by commercial uses, to the north by the A30 and to the south by lakes. The wider character is semi-urban with more open uses to the south and north.
Site-specific requirements[75]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • Make provision for 15 serviced travelling showpeople plots. • The site is only available for the designated use of Travelling Showpeople plots and not for general residential provision (Use Class C3). In accordance with Policy H3, the loss of plots to other uses will be resisted unless it can be demonstrated that there is a surplus supply of Travelling Showpeople plots. • The retention and enhancement of boundary planting should be used as an opportunity to provide net gains in biodiversity. This will need to be demonstrated through appropriate habitat/species surveys and implementation of management plans. • Sufficient screening and boundary provision to separate the site from the lakes to the south for safety purposes and nature conservation. • Strengthening of Green Belt boundaries to ensure the surrounding Green Belt performance is not compromised and retains a strategic function. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with policy PS1 to make buildings zero carbon where possible. • Development should ensure that suitable mitigation is in place so that sensitive receptors would not be adversely affected by the Charlton Lane Community Recycling Centre, Waste Transfer Station and Materials Recycling Facility.
Opportunities	• Development should contribute to the enhancement of public transport, walking and cycling infrastructure and links to local town centres and other destinations such as places of employment, services and leisure in order to minimise traffic generation and improve the connectivity.
Delivery Timeframe	2024-2028 (years 1-5)

[75] Refer to Policy ID2 in regard to sustainable transport for new developments.

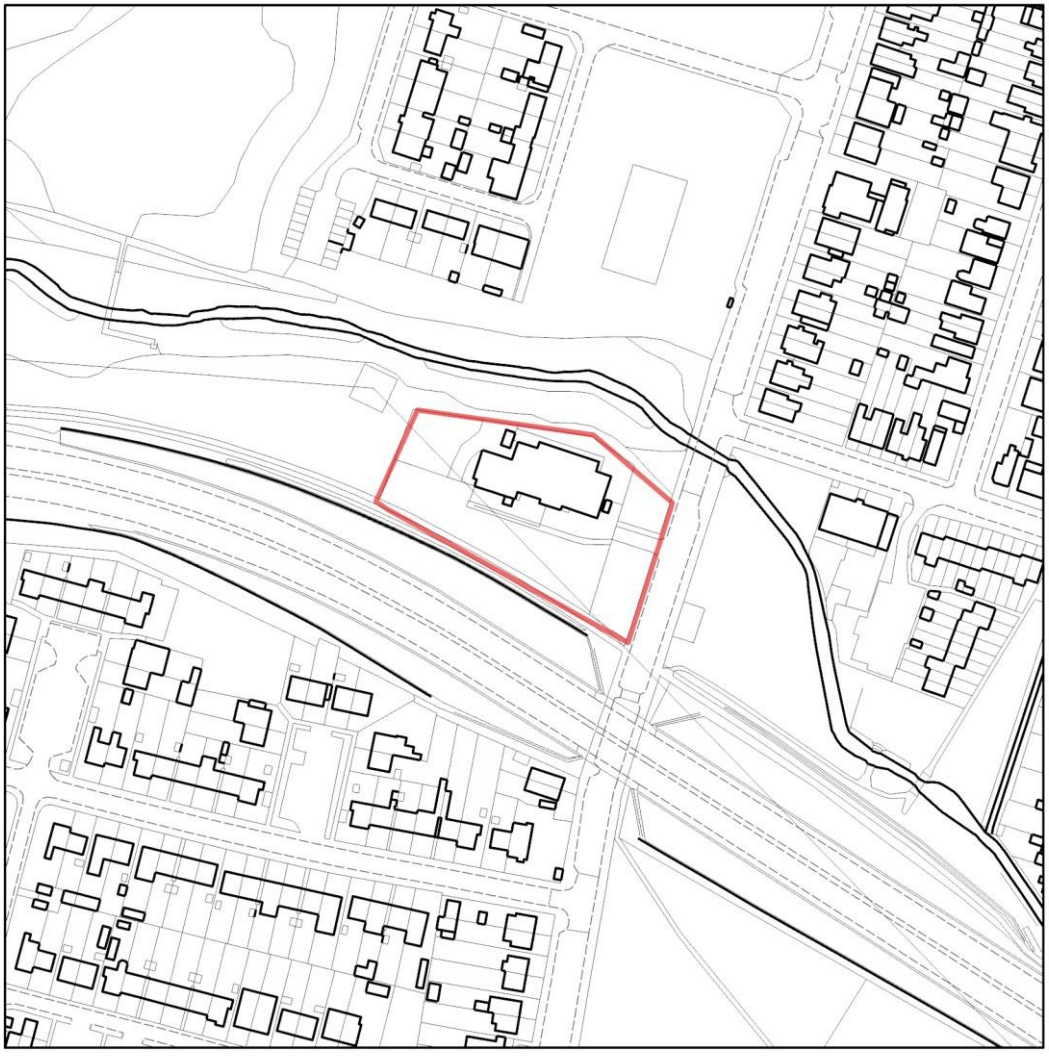
AT1/002 (Land East of Ashford Sports Club, Woodthorpe Road)

Site Information	
Site ID	AT1/002
Site name/ address	Land East of Ashford Sports Club, Woodthorpe Road, Ashford, TW15 3JX
Site area (ha)	1.15
Location	Greenfield land Former Green Belt
Ward	Ashford Town
Proposed Allocation	Residential (C3): 108 units (approx.)

Site description & existing use	The site is open land within a wider sports club facility. The site is surplus to requirements and does not fulfil an open space or recreation role. The site is not publicly accessible. The land to the west is occupied by tennis courts, playing pitches, ancillary buildings and hardstanding for parking associated with the sports club. To the east are residential properties in Ashford Close and to the north is the railway line. Woodthorpe Road is located to the south. The wider area is largely urban in character.
Site-specific requirements[76]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • The proposals will be expected to contribute to the enhancement of the adjacent sports facilities at Ashford Sports Club. • 50% Affordable Housing [subject to viability testing] • The enhancement of boundary planting should be used as an opportunity to provide net gains in biodiversity. This will need to be demonstrated through appropriate habitat/species surveys and implementation of management plans. • Strengthening of the adjacent Green Belt boundaries to retain its performance and strategic role. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • The site should be laid out to ensure that it does not impact upon the Esso Southampton to London Pipeline infrastructure on site. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible. • Applicants are encouraged to develop the detailed design of the site in collaboration with the LPA. Use of a Design Review Panel will be encouraged where it is considered that it can positively shape development.
Opportunities	• Development should contribute to the enhancement of public transport, walking and cycling infrastructure and links to local town centres and other destinations such as places of employment, services and leisure in order to minimise traffic generation and improve the connectivity. • The site should accommodate a scheme of high-quality design that makes a positive contribution to the wider environment and character.
Delivery Timeframe	Following the completion of the Esso Southampton to London Pipeline works (end of 2023 Q1) 2024-2028 (years 1-5)

[76] Refer to Policy ID2 in regard to sustainable transport for new developments.

AT1/012 (Ashford Community Centre, Woodthorpe Road)

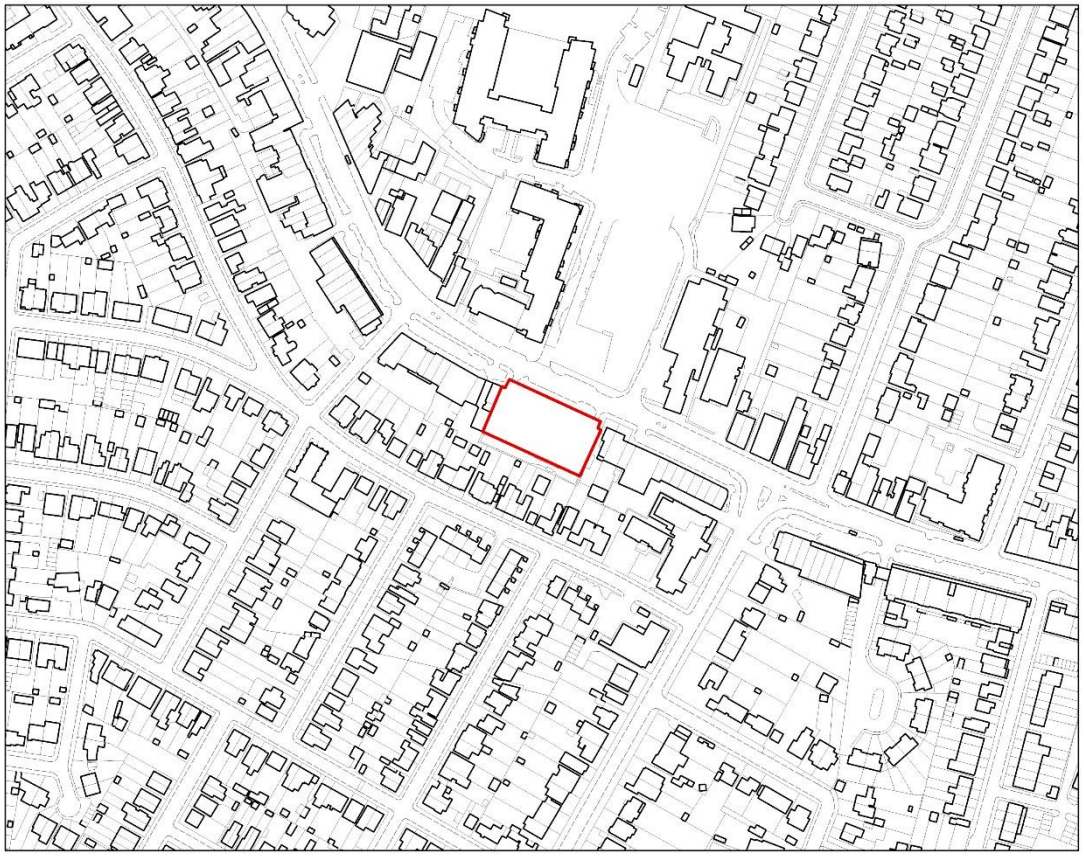
Site Information	
Site ID	AT1/012
Site name/ address	Ashford Community Centre, Woodthorpe Road, Ashford, TW15 3LF
Site area (ha)	0.47
Location	Previously developed land Former Green Belt
Ward	Ashford Town
Proposed Allocation	Local Community F2(b): 300sqm Community Centre (approx.) Residential (C3): 32 units
	
Site description & existing use	The site is bounded by the A308 Staines By-Pass to the south and the River Ash to the north and is accessed from Woodthorpe Road. Woodthorpe Road is predominantly a

	residential area. Ashford Community Centre is located on the site. The site provides a community centre of 635 sqm, and 43 marked car parking spaces. The community centre was built in the 1950s and is at the end of its life. Most of the site is covered in hardstanding.
Site-specific requirements[77]	In order to ensure that future development does not increase the risk of flooding to the surrounding areas, the built footprint of the new development should not exceed that of the existing building and where possible should be reduced. The site layout will be required to be designed to ensure development is set back from the River Ash. In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • Retention of the community centre use on site, to an equivalent or higher quality standard. • 100% affordable housing (Council-owned) provision. • The enhancement of boundary planting should be used as an opportunity to provide net gains in biodiversity. This will need to be demonstrated through appropriate habitat/species surveys and implementation of management plans. • Strengthening of the adjacent Green Belt boundaries to retain its performance and strategic role. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible. • It is expected that the detailed design for this site will be developed in collaboration with the applicant, a design review panel and the Council.
Opportunities	• Development should contribute to the enhancement of public transport, walking and cycling infrastructure and links to local town centres and other destinations such as places of employment, services and leisure in order to minimise traffic generation and improve the connectivity. • The site should accommodate a scheme of high-quality design that makes a positive contribution to the wider environment and character.
Delivery Timeframe	2024-2028 (years 1-5)

[77] Refer to Policy ID2 in regard to sustainable transport for new developments.

AT3/007 (Ashford Multi-storey Car Park, Church Road)

Site Information	
Site ID	AT3/007
Site name/ address	Ashford Multi-storey Car Park, Church Road, Ashford, TW15 2TY
Site area (ha)	0.2
Location	Urban area Previously developed land
Ward	Ashford Town
Proposed Allocation	Residential (C3): 55 units (approx.) Retail/community: 400 sqm (approx.)



Site description & existing use	The site is currently occupied by a multi-storey car park fronting onto the Church Road. The site is located between a row of shops, backing onto residential properties to the rear along Clarendon Road. Opposite the site is the Brooklands Development, formerly a college.

Site-specific requirements[78]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • A mixed-use development comprising residential development and ground floor retail/community uses to provide an active frontage. • A well-designed scheme that has a positive relationship with nearby town centre uses and existing residential properties nearby. • Sufficient parking re-provision to meet needs on site or in an appropriate nearby location. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible.
Opportunities	• This rectangular plot lends itself to a well-designed scheme that makes a positive contribution to the wider street scene. • Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options.
Delivery Timeframe	2024-2028 (years 1-5)

[78]Refer to Policy ID2 in regard to sustainable transport for new developments.

HS1/002 (Land at Croysdale Avenue/ Hazelwood Drive)

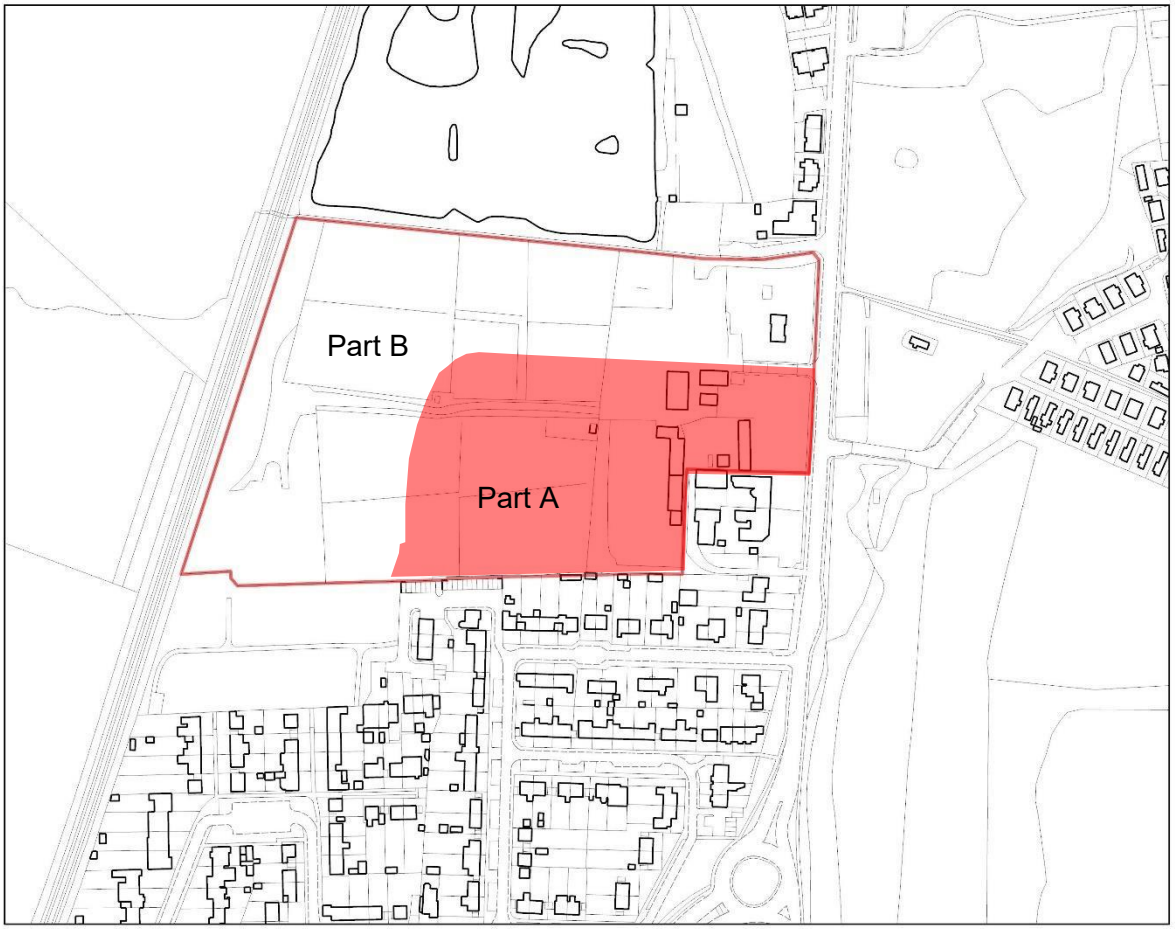
Site Information	
Site ID	HS1/002
Site name/ address	Land at Croysdale Avenue/ Hazelwood Drive, Sunbury, TW16 6QN
Site area (ha)	1.68
Location	Greenfield land Former Green Belt
Ward	Halliford and Sunbury West
Proposed Allocation	Residential (C3): 67 units (approx.)
Site description & existing use	The site is currently vacant green area characterised by trees and bushes. Along Croysdale Avenue/Hazelwood Drive to the north there is a maintained green verge with dispersed trees. To north and to the east are suburban residential areas. To the west is the London Irish Training grounds with its facility building and surface car park immediately adjacent to the site boundary.

	A public footpath and public right of way (School Walk) run to the south of the site with Sunbury cemetery beyond. An access lane runs from Croysdale Avenue alongside the west boundary through the site and joins the public footpath to the south.
Site-specific requirements[79]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • A mixed development of dwellinghouses and apartments. • Provide vehicle access to all new build dwellings from Hazelwood Drive. • Improved pedestrian access through the site and to School House and the Scout building, including maintenance of public Rights of Way. • Carry out appropriate engagement with nearby uses, to take account of the additional needs of residents in these buildings to understand the proposals. • 50% Affordable Housing [subject to viability testing] • Preservation of the tree belt along the site's northern boundary. • The enhancement of boundary planting should be used as an opportunity to provide net gains in biodiversity. This will need to be demonstrated through appropriate habitat/species surveys and implementation of management plans. • Strengthening of the adjacent Green Belt boundaries to retain its performance and strategic role adjacent to the site. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible. • It is expected that the detailed design for this site will be developed in collaboration with the applicant, a design review panel and the Council.
Opportunities	• Development should contribute to the enhancement of public transport, walking and cycling infrastructure and links to local town centres and other destinations such as places of employment, services and leisure in order to minimise traffic generation and improve the connectivity. • The site should accommodate a scheme of high-quality design that makes a positive contribution to the wider environment and character.
Delivery Timeframe	2024-2028 (years 1-5)

[79] Refer to Policy ID2 in regard to sustainable transport for new developments.

HS1/009 (Bugle Nurseries, Upper Halliford Road)

Site Information	
Site ID	HS1/009
Site name/ address	Bugle Nurseries, 171 Upper Halliford Road, Shepperton, TW17 8SN
Site area (ha)	4.83 2.28 (developable area for residential use
Location	Part previously developed land/part greenfield. Former Green Belt (Part A) Retain in Green Belt (Part B)
Ward	Halliford and Sunbury West
Proposed Allocation	Residential (C3): 79 units (approx.)



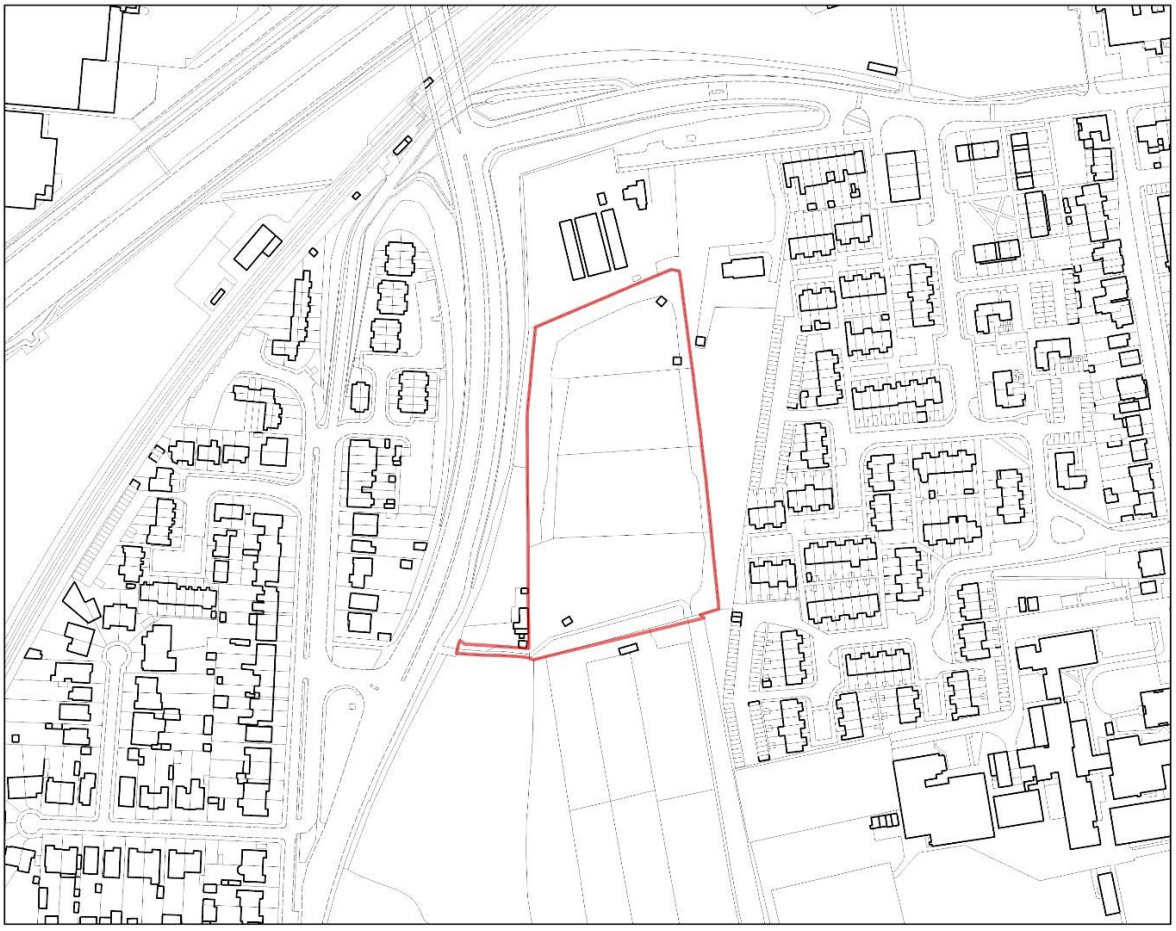
Site description & existing use	The site is located to the west of Upper Halliford Road and comprises open fields with paddocks, old nursery structures and other buildings and hardstanding in commercial use, including parking and access. The site is part of the wider Bugle Nurseries site which extends to include a residential bungalow to the north and additional open fields to the west. Part A is 2.28ha and has been identified for housing development and release from the Green Belt. Part B is 2.55ha and is identified for open space and is to be retained in the Green Belt to maintain the northern boundary. Immediately to the south east of the site are residential properties positioned at right angles within Halliford Close, whose rear gardens adjoin the application site. Further to the west, the garages of properties at Bramble Close and allotments adjoin the application site to the south. Directly to the north of the site is a public footpath and the site of the former Bugle Public House which has been rebuilt as apartments. Further to the north are other dwellings fronting Upper Halliford Road, with open grass land behind and a large fishing lake to the north west of the site. A Tree Preservation Order is on a tree in the north-eastern corner of the wider Bugle Nurseries site however this is outside the allocation boundary.
Site-specific requirements[80]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • A mixed development of dwellinghouses and apartments on Part A. • Provision of a publicly accessible open space on the remainder of the site (Part B). • The creation and maintenance of a buffer along the northern boundary of the site to retain and enhance the Green Belt function. The buffer should be no less than 50 meters and remain open and free of development. This should be continuous with the public open space to the rear of the site. • Provision of a pedestrian crossing adjacent to the site on Upper Halliford Road. • 50% Affordable Housing [subject to viability testing]. • The enhancement of boundary planting should be used as an opportunity to provide net gains in biodiversity. This will need to be demonstrated through appropriate habitat/species surveys and implementation of management plans. • Strengthening of the adjacent Green Belt boundaries to retain its performance and strategic role adjacent to the site. • Remediation of the existing waste transfer use on site. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms.

[80] Refer to Policy ID2 in regard to sustainable transport for new developments.

	• Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible. • It is expected that the detailed design for this site will be developed in collaboration with the applicant, a design review panel and the Council. • Development should ensure that suitable mitigation is in place so that sensitive receptors would not be adversely affected by the Charlton Lane Community Recycling Centre, Waste Transfer Station and Materials Recycling Facility.
Opportunities	• Development should contribute to the enhancement of public transport, walking and cycling infrastructure and links to local town centres and other destinations such as places of employment, services and leisure in order to minimise traffic generation and improve the connectivity. • The site should accommodate a scheme of high-quality design that makes a positive contribution to the wider environment and character.
Delivery Timeframe	2024-2028 (years 1-5)

HS1/012 (Land East of Upper Halliford, Nursery Road)

Site Information	
Site ID	HS1/012
Site name/ address	Land East of Upper Halliford, Nursery Road, Upper Halliford, TW16 6JW
Site area (ha)	1.61
Location	Greenfield land Former Green Belt
Ward	Halliford and Sunbury West
Proposed Allocation	Residential (C3): 70 units (approx.) Open space provision



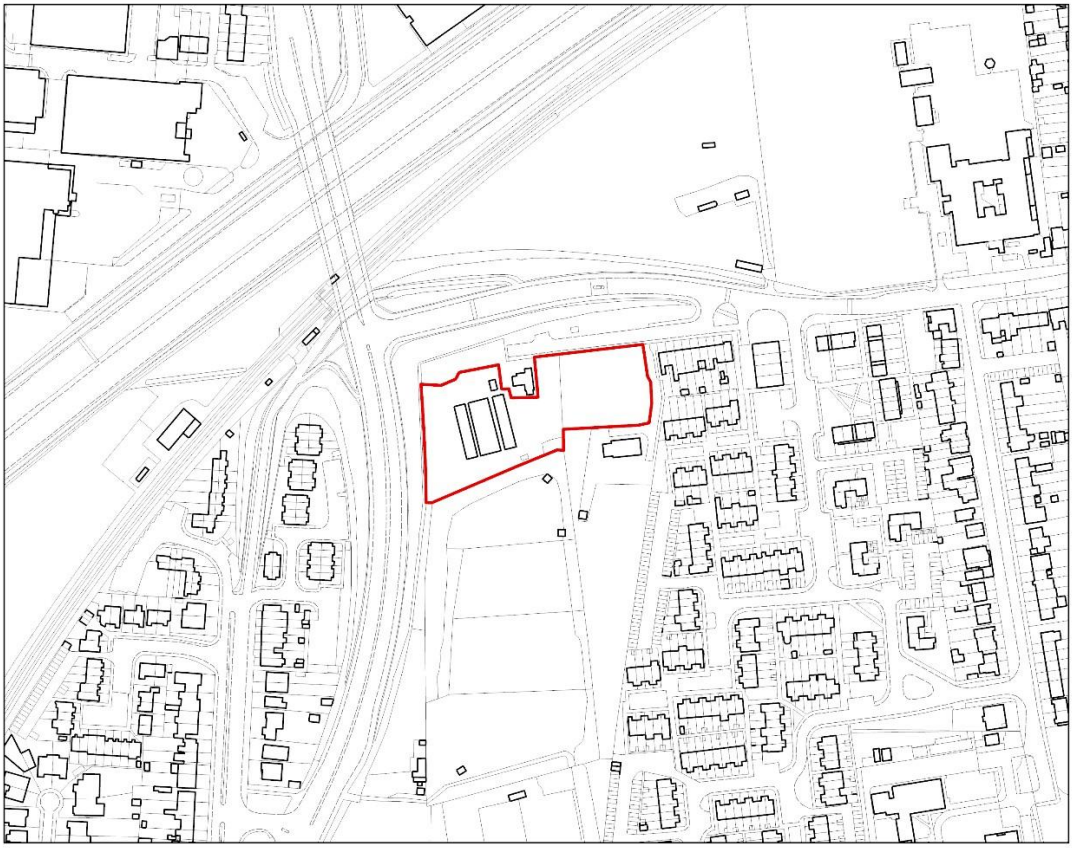
Site description & existing use	The site is rectangular in shape and is currently occupied by an open field used for equestrian grazing, with several structures on site associated with this use. The site is located to the west of Upper Halliford Road, northeast of The Bishop Wand Secondary School and is bound by trees and hedging.

	The land adjoins residential to the east, a vacant area to the immediate south and housing further south and west. Upper Halliford Park is located further south west.
Site-specific requirements[81]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • The provision of a new vehicular and pedestrian access road through the site from Upper Halliford Road to the Bishop Wand School. • Provide high-quality, well-designed, safe access/egress into and out of the site for pedestrians, cyclists and vehicles, including suitable junction improvements. • 50% Affordable Housing [subject to viability testing] • The enhancement of boundary planting should be used as an opportunity to provide net gains in biodiversity. This will need to be demonstrated through appropriate habitat/species surveys and implementation of management plans. • Maximise retention and safeguarding of existing trees and hedgerows. • Strengthening of the adjacent Green Belt boundaries to retain its performance and strategic role adjacent to the site. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible. • It is expected that the detailed design for this site will be developed in collaboration with the applicant, a design review panel and the Council.

[81] Refer to Policy ID2 in regard to sustainable transport for new developments.

Opportunities	• Development should contribute to the enhancement of public transport, walking and cycling infrastructure and links to local town centres and other destinations such as places of employment, services and leisure in order to minimise traffic generation and improve the connectivity. Appropriate linkages with the Spelthorne Local Cycling and Walking Infrastructure Plan. • The site should accommodate a scheme of high-quality design that makes a positive contribution to the wider environment and character.
Delivery Timeframe	2024-2028 (years 1-5)

HS2/004 (Land South of Nursery Road)

Site Information	
Site ID	HS2/004
Site name/ address	Land South of Nursery Road, Sunbury on Thames, TW18 6LX
Site area (ha)	0.66
Location	Greenfield land Former Green Belt
Ward	Halliford and Sunbury West
Proposed Allocation	Residential (Use Class C3): 41 units (approx.)
	
Site description & existing use	The site is located to the south of Nursery Road and east of the A244 (Upper Halliford Road). The site is rectangular in shape which slopes away from Nursery Road towards the south east corner of the site. It is currently vacant, although old structures associated with previous nursery use is located on site. A bungalow is enclosed within the centre of the site but outside its boundaries. The nearby A244 lifts above the railway line, with the site at a lower level. Vegetation lines the road and site which limits views between the two.

Site-specific requirements[82]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • Improved pedestrian linkages to nearby community facilities and existing active travel routes, including the widening of the footway adjacent to the site. • 50% Affordable Housing [subject to viability testing] • The enhancement of boundary planting should be used as an opportunity to provide net gains in biodiversity. This will need to be demonstrated through appropriate habitat/species surveys and implementation of management plans. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with policy PS1 • It is expected that the detailed design for this site will be developed in collaboration with the applicant, a design review panel and the Council.
Opportunities	• Development should contribute to the enhancement of public transport, walking and cycling infrastructure and links to local town centres and other destinations such as places of employment, services and leisure in order to minimise traffic generation and improve the connectivity. Appropriate linkages with the Spelthorne Local Cycling and Walking Infrastructure Plan. • The site should accommodate a scheme of high-quality design that makes a positive contribution to the wider environment and character.
Delivery Timeframe	2024-2028 (years 1-5)

[82] Refer to Policy ID2 in regard to sustainable transport for new developments.

LS1/024 (Land at Staines Road West and Cedar Way)

Site Information	
Site ID	LS1/024
Site name/ address	Land at Staines Road West and Cedar Way, Sunbury, TW16 7BL
Site area (ha)	1.63
Location	Greenfield Land Former Green Belt
Ward	Laleham and Shepperton Green
Proposed Allocation	Residential (C3): 77 units (approx.)
Site description & existing use	The site is located on the south side of Staines Road West and to the west of Cedar Way. Spelthorne Sports club is located immediately west of the site. The Staines Reservoirs Aqueduct runs immediately south of the site with the Thames Water treatment works further south. The site is currently free from development and is occupied by paddocks and grazing land.
Site-specific requirements[83]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following:

[83] Refer to policy ID2 in regard to sustainable transport for new developments.

	• A mix of dwellinghouses and apartments. • Suitable junction improvements to enable safe access/egress into and out of the site. • 50% Affordable Housing [subject to viability testing] • The enhancement of boundary planting should be used as an opportunity to provide net gains in biodiversity. This will need to be demonstrated through appropriate habitat/species surveys and implementation of management plans. • Strengthening of the adjacent Green Belt boundaries to retain its performance and strategic role adjacent to the site. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible. • Applicants are encouraged to develop the detailed design of the site in collaboration with the LPA. Use of a Design Review Panel will be encouraged where it is considered that it can positively shape development.
Opportunities	• Development should contribute to the enhancement of public transport, walking and cycling infrastructure and links to local town centres and other destinations such as places of employment, services and leisure in order to minimise traffic generation and improve the connectivity. Appropriate linkages with the Spelthorne Local Cycling and Walking Infrastructure Plan. • The site should accommodate a scheme of high-quality design that makes a positive contribution to the wider environment and character.
Delivery Timeframe	2024-2028 (years 1-5)

SE1/005 (Benwell House, Green Street)

Site Information	
Site ID	SE1/005
Site name/ address	Benwell House, Green Street, Sunbury, TW16 6QF
Site area (ha)	0.7
Location	Urban area Previously developed land
Ward	Sunbury East
Proposed Allocation	Residential (C3): 39 Units (approx.)

Site description & existing use	The site is currently occupied by a converted office to residential building, previously occupied by the Benwell House offices. The surrounding area contains a mix of residential and commercial uses. A large number of semi-detached properties are present to the east, with flats to the north and south and some commercial units to the west. The proposed development site excludes the converted office building and includes the undeveloped grounds.

Site-specific requirements[84]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • Maximise retention and safeguarding of existing mature trees, including those which are subject to a Tree Preservation Order, incorporating those features in a coherent landscaping strategy for the site. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible.
Opportunities	• This plot lends itself to a well-designed scheme that makes a positive contribution to the wider street scene. • Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options.
Delivery Timeframe	2024-2028 (years 1-5)

[84] Refer to Policy ID2 in regard to sustainable transport for new developments.

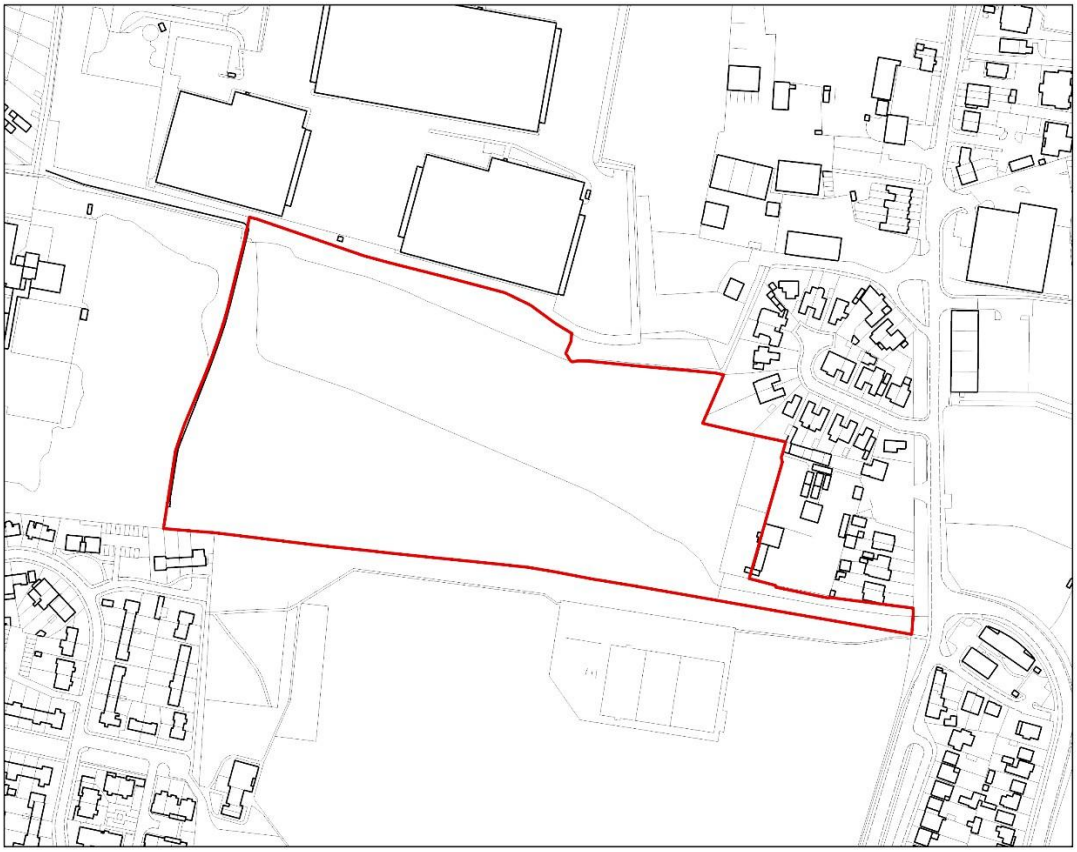
SE1/024 (Annandale House, Hanworth Road)

Site Information	
Site ID	SE1/024
Site name/ address	Annandale House, 1 Hanworth Road, Sunbury, TW16 5DJ
Site area (ha)	0.97
Location	Urban area Previously developed land
Ward	Sunbury East
Proposed Allocation	Residential (C3): 295 units (approx.) Ground floor retail (Class E): 450 sqm (approx.)
Site description & existing use	The site is located on the south side of Hanworth Road and is occupied by a two-storey office building and associated parking area. To the north of the site is the M3 motorway with Sunbury Cross roundabout to the west. To the east of the site is a hotel and three apartment buildings with commercial uses further east. The A308 runs to the south with the Shepperton rail line beyond. The site is located within the current Hanworth Road employment area.

Site-specific requirements [85]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • A mixed-use development comprising residential development and ground floor retail/Class E use to provide an active commercial frontage. • A well-designed scheme that has a positive relationship with nearby town centre uses. • Carry out an Air Quality Assessment and identify suitable mitigation to overcome any impacts. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible. • Applicants are encouraged to develop the detailed design of the site in collaboration with the LPA. Use of a Design Review Panel will be encouraged where it is considered that it can positively shape development.
Opportunities	• This plot in a prominent location at Sunbury Cross Roundabout lends itself to a well-designed scheme that makes a positive contribution to the wider street scene. • Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options. Linkages with the Spelthorne Local Cycling and Walking Infrastructure Plan.
Delivery Timeframe	2024-2028 (years 1-5)

[85] Refer to Policy ID2 in regard to sustainable transport for new developments.

SN1/006 (Land to West of Long Lane and South of Blackburn Trading Estate)

Site Information	
Site ID	SN1/006
Site name/ address	Land to West of Long Lane and South of Blackburn Trading Estate, Stanwell, TW19 7AN
Site area (ha)	4.83
Location	Greenfield land Former Green Belt
Ward	Stanwell North
Proposed Allocation	Residential (C3): 200 units Open space provision
	
Site description & existing use	The site is currently undeveloped vacant land and is bounded by Blackburn Trading Estate to the north; hardstanding associated with van hire and storage area is located to the east; and recreation/school fields to the west and south beyond a mature belt of landscaping. The site is accessed via Long Lane. The wider area is largely urban in character, with mixed industrial, and warehousing to the north and east and residential

	development west and further south. Heathrow Airport is situated further north of the site past Blackburn Trading Estate.
Site-specific requirements[86]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • A mix of dwellinghouses and flats • Suitable junction improvements to enable safe access/egress into and out of the site. • 50% Affordable Housing [subject to viability testing] • The enhancement of boundary planting should be used as an opportunity to provide net gains in biodiversity. This will need to be demonstrated through appropriate habitat/species surveys and implementation of management plans. • Strengthening of the adjacent Green Belt boundaries to retain its performance and strategic role adjacent to the site. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible. • Applicants are encouraged to develop the detailed design of the site in collaboration with the LPA. Use of a Design Review Panel will be encouraged where it is considered that it can positively shape development.
Opportunities	• Development should contribute to the enhancement of public transport, walking and cycling infrastructure and links to local town centres and other destinations such as places of employment, services and leisure in order to minimise traffic generation and improve the connectivity. • The site should accommodate a scheme of high-quality design that makes a positive contribution to the wider environment and character.
Delivery Timeframe	2024-2028 (years 1-5)

[86] Refer to Policy ID2 in regard to sustainable transport for new developments.

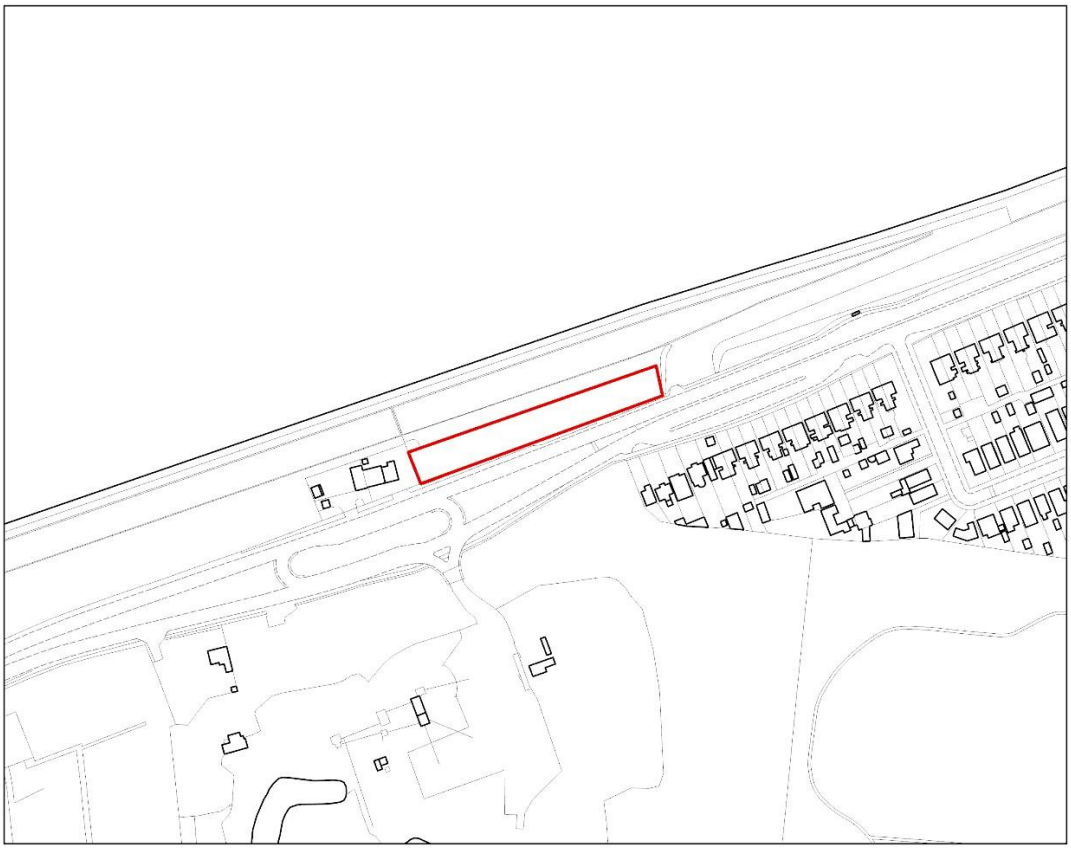
ST1/037 (Thameside House, South Street)

Site Information	
Site ID	ST1/037
Site name/ address	Thameside House, South Street, Staines, TW18 4PR
Site area (ha)	1.26
Location	Urban area Previously developed land
Ward	Staines
Proposed Allocation	Residential (C3): up to 140 units (approx.) Flexible Commercial (Class E): 3,200 sqm (approx.)
Site description & existing use	The site is occupied by Thameside House, located on the corner of South Street (A308) and Thames Street (B376) and extends along South Street to incorporate the underused surface carparking areas to the north of Thameside House. The site is located on the edge of the Town Centre and approximately 0.6km southwest of Staines Rail Station.

Site-specific requirements[87]	Within the area which falls within flood zone 3a (1% AEP), the built footprint of the new development should not exceed that of the existing building and where possible should be reduced. The site layout will be required to be designed to ensure all development is able to access the safe route for access and egress (shown within the SFRA Level 2) during a flood event (i.e. the 1% AEP fluvial flood event and surface water event including an appropriate climate change allowance). In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • A mixed-use development comprising residential development and flexible commercial uses. • A well-designed scheme that has a positive relationship with nearby town centre uses. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible. • Applicants are encouraged to develop the detailed design of the site in collaboration with the LPA. Use of a Design Review Panel will be encouraged where it is considered that it can positively shape development.
Opportunities	• This plot at the edge of the town centre lends itself to a high-quality scheme that makes a positive contribution to the wider street scene. • Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options.
Delivery Timeframe	2024-2028 (years 1-5)

[87] Refer to Policy ID2 in regard to sustainable transport for new developments.

ST1/043 (Land East of 355 London Road)

Site Information	
Site ID	ST1/043
Site name/ address	Land East of 355 London Road, Staines
Site area (ha)	0.27
Location	Greenfield land Former Green Belt
Ward	Staines
Proposed Allocation	Gypsy and Traveller pitches: 3
	
Site description & existing use	The site is publicly owned, undeveloped open greenfield land. It is located to the north of London Road (A30). The site is located within the Green Belt and the Colne Valley Park. In addition, the southern boundary of the land is identified as an area of High Archaeological Importance. The site is undeveloped open greenfield land. To the east is a further area of open land, with a commercial premises to the west. Opposite is Hengrove Farm minerals site with housing to the southeast across the A30.

Site-specific requirements[88]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • Make provision for 3 serviced gypsy and traveller pitches. • The site is only available for the designated use of Gypsy and Traveller pitches and not for general residential provision (Use Class C3). In accordance with Policy H3, the loss of pitches to other uses will be resisted unless it can be demonstrated that there is a surplus supply of traveller pitches. • The retention and enhancement of boundary planting should be used as an opportunity to provide net gains in biodiversity. This will need to be demonstrated through appropriate habitat/species surveys and implementation of management plans. • Strengthening of Green Belt boundaries to ensure the surrounding Green Belt performance is not compromised and retains a strategic function. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible. • It is expected that the detailed design for this site will be developed in collaboration with the applicant, a design review panel and the Council.
Opportunities	• Development should contribute to the enhancement of public transport, walking and cycling infrastructure and links to local town centres and other destinations such as places of employment, services and leisure in order to minimise traffic generation and improve the connectivity.
Delivery Timeframe	2024-2028 (years 1-5)

[88] Refer to Policy ID2 in regard to sustainable transport for new developments.

ST3/004 (Oast House, Kingston Road)

Site Information	
Site ID	ST3/004
Site name/ address	34-36 Kingston Road (Oast House) & Car Park, Staines, TW18 4LN
Site area (ha)	0.92
Location	Urban area Previously developed land
Ward	Staines
Proposed Allocation	Residential (C3): up to 180 units (approx.) Community/Healthcare use: 4500 sqm
Site description & existing use	The site is currently occupied by a mix of uses including Surrey County Council buildings, a Spelthorne Borough Council operated carpark and private buildings. The Surrey County Council buildings (adult learning centre at 34-36 and 36B) are vacant with part listed. A footpath runs to the south of the site with Staines Police Station to the west. Several semi-detached residential properties and garages are located to the northeast along Kingston Road. The Staines rail line is located to the south with Staines station further to the southeast.

	The site can be accessed on foot via Station Path to the south or from Kingston Road to the north. The surrounding character is mixed commercial and residential.
Site-specific requirements[89]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • A mixed-use development comprising residential development and health/community uses. • A well-designed scheme that has a positive relationship with nearby town centre uses and nearby residential properties • Conserve and, where possible, enhance heritage assets and their setting, most notably the Grade II listed Oast House on site. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible. • Applicants are encouraged to develop the detailed design of the site in collaboration with the LPA. Use of a Design Review Panel will be encouraged where it is considered that it can positively shape development.
Opportunities	• This plot at the edge of the town centre lends itself to a high-quality scheme that makes a positive contribution to the wider street scene. • Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options.
Delivery Timeframe	2024-2028 (years 1-5)

[89] Refer to Policy ID2 in regard to sustainable transport for new developments.

HS1/012b (Land East of Upper Halliford Road)

Site Information	
Site ID	HS1/012b
Site name/ address	Land East of Upper Halliford Road (Site B), Upper Halliford, TW16 6JL
Site area (ha)	2.34
Location	Greenfield land Former Green Belt
Ward	Halliford and Sunbury West
Proposed Allocation	Sixth form college (Use Class F1) Residential (Use Class C3): 20 units (approx.)
Site description & existing use	The site is linear in shape and is currently occupied by an open field, with several small structures on site. The site is located to the west of Upper Halliford Road, east of The Bishop Wand Secondary School and is bound by trees and hedging. The land adjoins residential to the northeast, south and west across Upper Halliford Road. Upper Halliford Park is located further southwest.

Site-specific requirements[90]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • Provision for new sixth form college facilities supported by the provision of approximately 20 houses to enable the education provision. • The provision of a new vehicular and pedestrian access road through the site from Upper Halliford Road to the Bishop Wand School, alongside HS1/012. • 50% Affordable Housing [subject to viability testing] • The enhancement of boundary planting should be used as an opportunity to provide net gains in biodiversity. This will need to be demonstrated through appropriate habitat/species surveys and implementation of management plans. • Strengthening of the adjacent Green Belt boundaries to retain its performance and strategic role beyond the site. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible. • It is expected that the detailed design for this site will be developed in collaboration with the applicant, a design review panel and the Council.
Opportunities	• Development should contribute to the enhancement of public transport, walking and cycling infrastructure and links to local town centres and other destinations such as places of employment, services and leisure in order to minimise traffic generation and improve the connectivity. Appropriate linkages with the Spelthorne Local Cycling and Walking Infrastructure Plan. • The site should accommodate a scheme of high-quality design that makes a positive contribution to the wider environment and character.
Delivery Timeframe	2024-2028 (years 1-5)

[90] Refer to Policy ID2 in regard to sustainable transport for new developments.

AS1/003 (Former Staines Fire Station, Town Lane)

Site Information	
Site ID	AS1/003
Site name/ address	Former Staines Fire Station, Town Lane, Stanwell, TW19 7JP
Site area (ha)	0.43
Location	Urban area Previously developed land
Ward	Ashford North and Stanwell South
Proposed Allocation	Residential (C3): 50 units (approx.)

Site description & existing use	The site is occupied by the now disused Staines Fire Station which has been replaced by a new station facility at Fordbridge Road in Ashford. The site is occupied by a two-storey building with a double fire engine garage, parking area and training tower. The site is currently occupied by an ambulance 'Make Ready Centre' and is required operationally for the ambulance service. An alternative location for this use will therefore require identification prior to the redevelopment of this site. The site is adjacent to the Staines Reservoirs which have a number of international and national biodiversity designations (SPA, Ramsar and SSSI).
Site-specific requirements[91]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • Identification of alternative location for the ambulance 'Make Ready Centre' prior to redevelopment. • Through provision of landscaping and boundary planting provide net gains in biodiversity; This will need to be demonstrated through appropriate habitat/species surveys and implementation of management plans. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible.
Opportunities	• Provide positive benefit in terms of landscape and townscape character and local distinctiveness and have regard to the identified landscape character areas.
Delivery Timeframe	2024-2028 (years 1-5)

[91] Refer to Policy ID2 in regard to sustainable transport for new developments.

SC1/019 (Sunbury Social Services Centre, Vicarage Road)

Site Information	
Site ID	SC1/019
Site name/ address	Sunbury Social Services Centre, 108 Vicarage Road, Sunbury, TW16 7QL
Site area (ha)	0.23
Location	Urban area Previously developed land
Ward	Sunbury Common
Proposed Allocation	Residential (C3): 11 units (approx.) Ground floor community units or re-provision off site
Site description & existing use	The site is currently occupied by a single storey building with community uses present. To the rear of the site is a car parking area. The site is located on the corner of Vicarage Road and Wychwood Close. A mature tree is situated in the front of the site. The surrounding character is predominantly residential, with a few small-scale commercial uses to the south of the site. Several small, flatted developments are present south along Vicarage Road.

Site-specific requirements [92]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • A housing scheme subject to the existing use being re-provided off site in location accessible to the community, prior to redevelopment, or a mixed use scheme incorporating ground floor community uses. • Include measures to mitigate the impact of development on the local road network and take account of impacts on the strategic road network as identified through a site-specific Travel Plan and Transport Assessment. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible.
Opportunities	• This plot lends itself to a well-designed scheme that makes a positive contribution to the wider street scene. • Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options.
Delivery Timeframe	2024-2028 (years 1-5)

[92] Refer to Policy ID2 in regard to sustainable transport for new developments.

SE1/020 (Sunbury Adult Education Centre, The Avenue)

Site Information	
Site ID	SE1/020
Site name/ address	Sunbury Adult Education Centre, The Avenue, Sunbury-on-Thames, TW16 5DZ
Site area (ha)	0.43
Location	Urban area Previously developed land
Ward	Sunbury East
Proposed Allocation	Residential (C3): 30 units (Approx.)
Site description & existing use	The site is currently occupied by a 1-2 storey building in use for adult education purposes. A parking area is situated to the front and rear of the site with trees lining the west and east. The site is situated within the urban area of Sunbury. The site is accessed via The Avenue to the west. A sports ground is situated to the south of the site, with family dwelling houses to the north, west and east.

Site-specific requirements[93]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • A housing scheme subject to the existing use being re-provided off site in location accessible to the community, prior to redevelopment. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible.
Opportunities	• This plot lends itself to a well-designed scheme that makes a positive contribution to the wider street scene. • Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options.
Delivery Timeframe	2024-2028 (years 1-5)

[93] Refer to Policy ID2 in regard to sustainable transport for new developments.

SE1/025 (Elmbrook House, Station Road)

Site Information	
Site ID	SE1/025
Site name/ address	Elmbrook House, 18-19 Station Road, Sunbury, TW16 6SU
Site area (ha)	0.25
Location	Urban area Previously developed land
Ward	Sunbury East
Proposed Allocation	Residential (C3): 50 Units (approx.)
Site description & existing use	The site is currently occupied by an office building and carpark. The site is within the urban area, adjacent to Sunbury Rail Station and other commercial uses occupy the wider area. Further north is Sunbury Cross Roundabout, with Green Street to the southwest.
Site-specific requirements [94]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following:

[94] Refer to Policy ID2 in regard to sustainable transport for new developments.

	• A well-designed scheme that has a positive relationship with nearby town centre uses. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible.
Opportunities	• This plot in a prominent location at Sunbury Cross Roundabout lends itself to a well-designed scheme that makes a positive contribution to the wider street scene. • Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options. Linkages with the Spelthorne Local Cycling and Walking Infrastructure Plan.
Delivery Timeframe	2024-2028 (years 1-5)

Years 6-10 (2029-2033)

AE3/006 (158-166 Feltham Road)

Site Information	
Site ID	AE3/006
Site name/ address	158-166 Feltham Road, Ashford, TW15 1YQ
Site area (ha)	1.31
Location	Urban area Previously developed land
Ward	Ashford East
Proposed Allocation	Housing (C3): 75 units (approx.)
Site description & existing use	The site is a long narrow site currently in use as warehousing. The site comprises 17 single storey brick business units known as Ashford Business Complex. There are quite substantial buildings on the site at present and it is bounded on three sides by residential properties. Access is through a primarily residential area. Feltham Road runs to the north of the site.

Site-specific requirements[95]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • A mix of houses and flats would contribute to the need for different types of housing in the Borough. • Through provision of landscaping and boundary planting provide net gains in biodiversity; This will need to be demonstrated through appropriate habitat/species surveys and implementation of management plans. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with policy PS1. • Applicants are encouraged to develop the detailed design of the site in collaboration with the LPA. Use of a Design Review Panel will be encouraged where it is considered that it can positively shape development.
Opportunities	• This rectangular plot lends itself to a well-designed scheme that makes a positive contribution to the wider street scene. • Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options.
Delivery Timeframe	2029-2033 (years 6-10)

[95] Refer to policy ID2 in regard to sustainable transport for new developments.

AS1/001 (Tesco Extra, Town Lane)

Site Information	
Site ID	AS1/001
Site name/ address	Tesco Extra, Town Lane, Stanwell, TW15 8RW
Site area (ha)	3.98
Location	Urban area Previously developed land
Ward	Ashford North and Stanwell South
Proposed Allocation	Retail: Retention of the existing superstore on site. Residential (C3): 350 units (approx.)

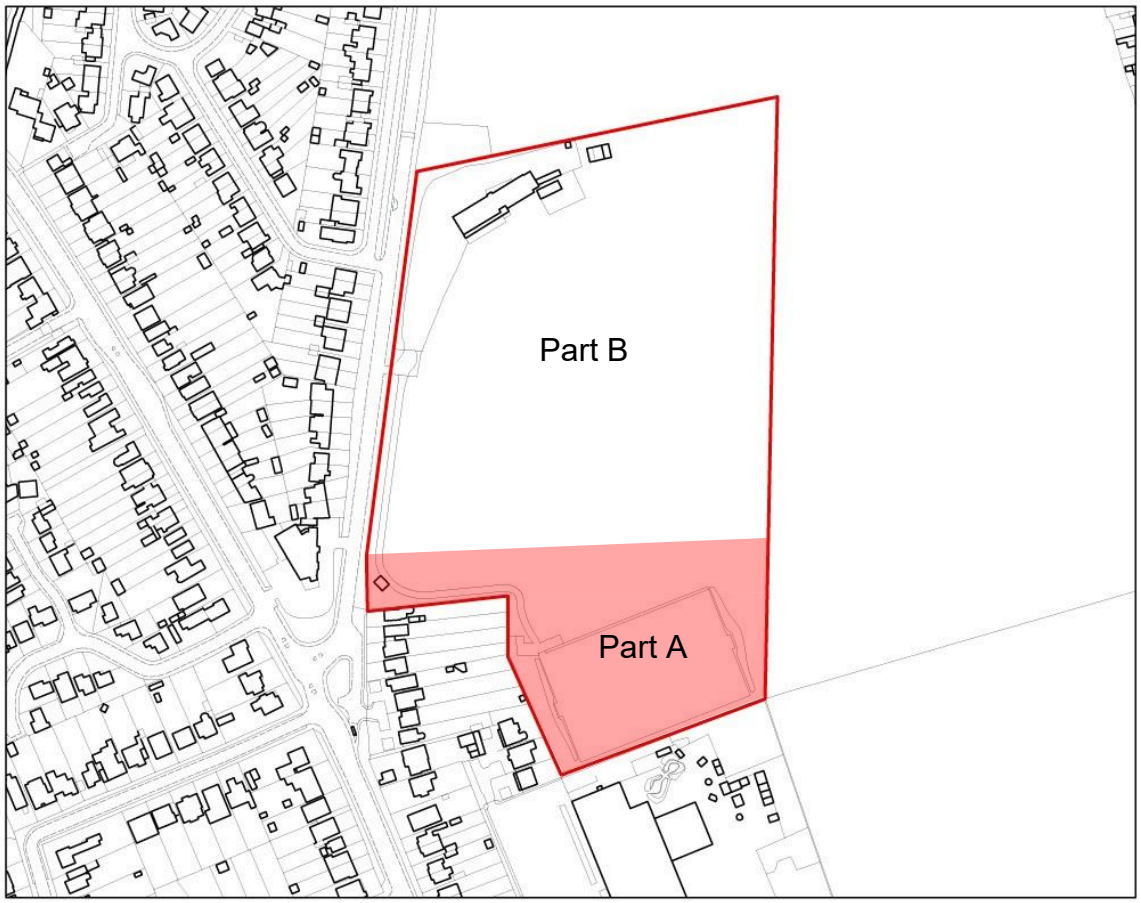
Site description & existing use	The site is currently occupied by a large Tesco superstore with adjoining car park and petrol station, located on land adjacent to Ashford Hospital. Residential dwellings lie to the north and east of the store, with the hospital buildings to the south and Town Lane and the Staines Reservoir bounding the western boundary. Access is via Town Lane.

Site-specific requirements[96]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • Retention of the existing superstore on site with adequate parking. • Through provision of landscaping and boundary planting provide net gains in biodiversity; This will need to be demonstrated through appropriate habitat/species surveys and implementation of management plans. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible. • Applicants are encouraged to develop the detailed design of the site in collaboration with the LPA. Use of a Design Review Panel will be encouraged where it is considered that it can positively shape development.
Opportunities	• Roads within the site should be designed to provide safe and legible walking and cycling access. There should be clear delineation between commercial and residential development. Development should contribute to the enhancement of public transport, walking and cycling infrastructure and links to local town centres and other destinations such as places of employment, services and leisure in order to minimise traffic generation and improve the connectivity.
Delivery Timeframe	2029-2033 (years 6-10)

[96] Refer to Policy ID2 in regard to sustainable transport for new developments.

RL1/011 (Land at Staines and Laleham Sports Club, Worple Road)

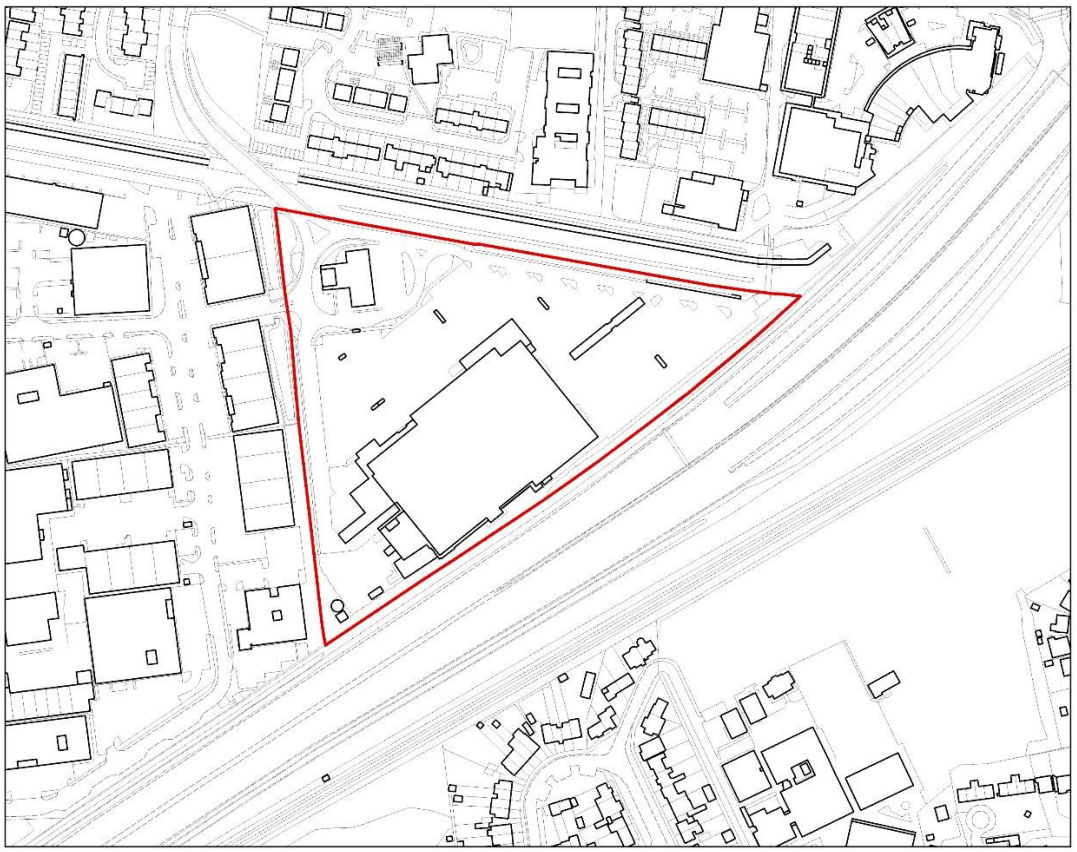
Site Information	
Site ID	RL1/011
Site name/ address	Land at Staines and Laleham Sports Club, Worple Road, Staines, TW18 1HR
Site area (ha)	6.03 1.59 (developable area for residential use)
Location	Greenfield land Former Green Belt (Part A) Retain in Green Belt (Part B)
Ward	Riverside and Laleham
Proposed Allocation	Residential (C3): 52 units (approx.) Upgraded sports facilities (Class F2)



Site description & existing use	The site is part of the Staines and Laleham Sports club with access via Worple Road. The wider sports club measures 6.03 hectares. This comprises Part A (1.59 hectares) which is identified for housing and release from the Green Belt and Part B (4.44 hectares) which is identified for improved sports facilities and is to be retained in the Green Belt. The site is currently occupied by a sports pitch and is to the south of the sports club area. It borders housing to the southwest and a garden centre to the south. Open greenfield land is present to the southeast.
Site-specific requirements[97]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • A mix of dwellinghouses and apartments on Part A. • The provision of a new vehicular and pedestrian access to the site from Worple Road, with additional pedestrian crossings. • The proposals will be expected to contribute to the enhancement of the adjacent sports facilities at Staines and Laleham Sports Association on Part B. This area will be retained in the Green Belt. • Suitable junction improvements to enable safe access/egress into and out of the site. • 50% Affordable Housing [subject to viability testing] • The enhancement of boundary planting should be used as an opportunity to provide net gains in biodiversity. This will need to be demonstrated through appropriate habitat/species surveys and implementation of management plans. • Strengthening of the adjacent Green Belt boundaries to retain its performance and strategic role adjacent to the site. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible. • It is expected that the detailed design for this site will be developed in collaboration with the applicant, a design review panel and the Council.
Opportunities	• Development should contribute to the enhancement of public transport, walking and cycling infrastructure and links to local town centres and other destinations such as places of employment, services and leisure in order to minimise traffic generation and improve the connectivity. Appropriate linkages with the Spelthorne Local Cycling and Walking Infrastructure Plan. • The site should accommodate a scheme of high-quality design that makes a positive contribution to the wider environment and character.
Delivery Timeframe	2029-2033 (years 6-10)

[97] Refer to Policy ID2 in regard to sustainable transport for new developments.

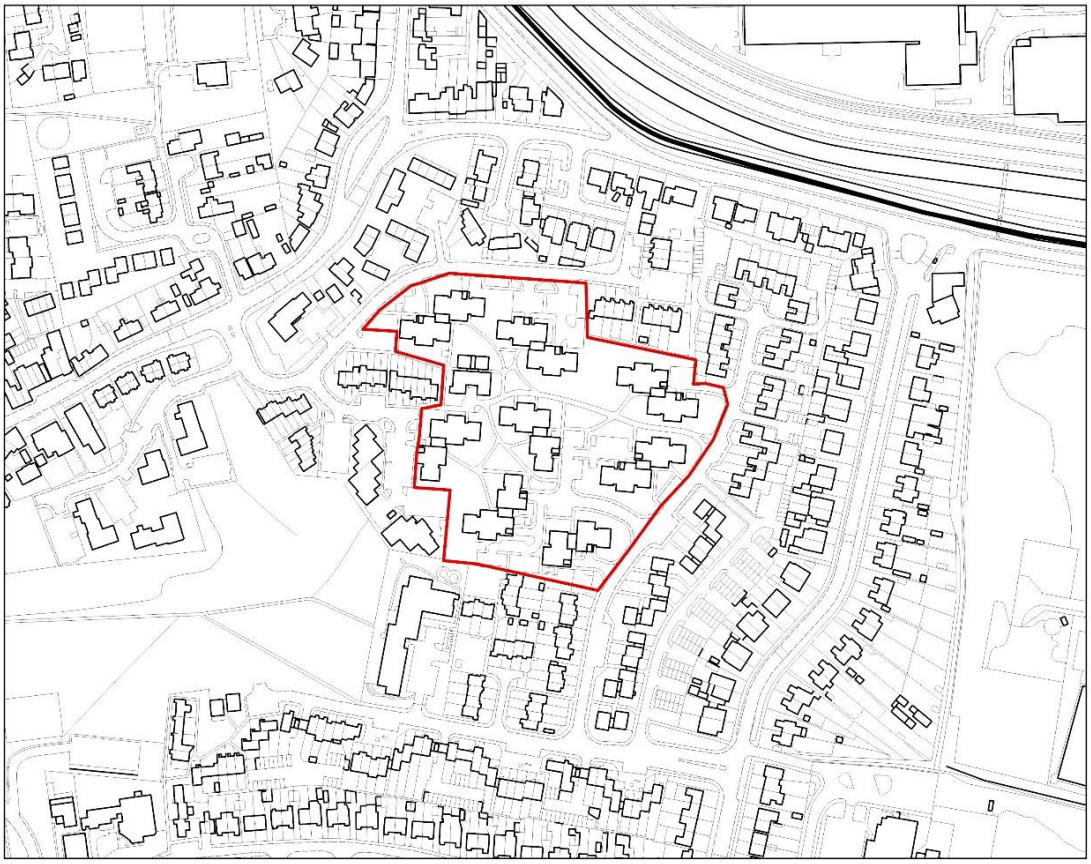
SC1/006 (Tesco Extra, Escot Road)

Site Information	
Site ID	SC1/006
Site name/ address	Tesco Extra, Escot Road, Sunbury, TW16 7BB
Site area (ha)	3.75
Location	Urban area Previously developed land
Ward	Sunbury Common
Proposed Allocation	Retail: Retention of the existing superstore on site. Residential (C3): 225 units (approx.)
	
Site description & existing use	The site is triangular in shape and is occupied by a Tesco Extra supermarket with associated servicing area, a petrol filling station and large surface car park. The northern boundary of the site is formed by Staines Reservoir Aqueduct, beyond which is Sunbury Cross Shopping Centre and existing residential properties at Spelthorne Grove and Forest Drive. The M3 runs to the south of the site with various industrial uses to the west.

Site-specific requirements[98]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • Retention of the existing superstore on site with appropriate parking. • Through provision of landscaping and boundary planting provide net gains in biodiversity; This will need to be demonstrated through appropriate habitat/species surveys and implementation of management plans. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible. • Applicants are encouraged to develop the detailed design of the site in collaboration with the LPA. Use of a Design Review Panel will be encouraged where it is considered that it can positively shape development.
Opportunities	• Roads within the site should be designed to provide safe and legible walking and cycling access. There should be clear delineation between commercial and residential development. Development should contribute to the enhancement of public transport, walking and cycling infrastructure and links to local town centres and other destinations such as places of employment, services and leisure in order to minimise traffic generation and improve the connectivity.
Delivery Timeframe	2029-2033 (years 6-10)

[98] Refer to Policy ID2 in regard to sustainable transport for new developments.

SN1/012 (Stanwell Bedsits, De Havilland Way)

Site Information	
Site ID	SN1/012
Site name/ address	Stanwell Bedsits, De Havilland Way, Stanwell, TW19 7DE
Site area (ha)	2.19
Location	Urban area, previously developed land.
Ward	Stanwell North
Proposed Allocation	Residential (C3): Estate regeneration providing 175 net additional units (approx.) a total of 413 gross (approx..) given existing provision.
	
Site description & existing use	The site comprises a number of blocks of flats incorporating studio flats. It is bounded by Whitley Close, Westland Close, De Havilland Way and Douglas Road and is within an area which has a strong residential character close to Stanwell Village. To the extreme north of the site is Heathrow Airport with an area of open space lying to the southwest of the site.

Site-specific requirements[99]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • Holistic redevelopment of the site to provide a new high quality housing scheme. • Contributions to provide enhanced and usable open space and play facilities for all members of the community and improved public realm prioritising enhanced pedestrian and cycle links to encourage sustainable travel shall be made on the net addition provision, along with like for like replacement of that lost. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the net additional dwellings acceptable in planning terms, unless a viability assessment peer reviewed by an independent assessor on behalf of the Council (but paid for by the developer) proves it is not viable to do so. • A suitable decanting plan for the existing properties as to minimise the disruption for current residents. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible unless a viability assessment peer reviewed by an independent assessor on behalf of the Council (but paid for by the developer) proves it is not viable to do so. • Any developer of the site will not be required to provide self and custom build housing in accordance with H1(13) and (14) • Applicants are encouraged to develop the detailed design of the site in collaboration with the LPA. Use of a Design Review Panel will be encouraged where it is considered that it can positively shape development.

[99] Refer to Policy ID2 in regard to sustainable transport for new developments.

Opportunities	• This plot lends itself to a well-designed scheme that makes a positive contribution to the wider street scene. • Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options. • Active frontages at the boundary edges. • Enhanced permeability of the site with the opportunity for new pedestrian routes. • Sensitive design that draws on the Stanwell conservation area character. • Stepped heights away from the centre of the site, to minimise impact on surrounding homes. • Surrey County Council parking strategy and guidance will be used as a guide for determining the appropriate level of on-site parking provision for the net additional dwellings. Opportunities for a car club, accessible car parking space, electric vehicle charging points; and cycle parking to serve the development to mitigate the traffic impacts, secured through a site specific Travel Plan, will be supported.
Delivery Timeframe	2029-2033 (years 6-10)

ST3/014 (Birch House/London Road, Fairfield Avenue, Staines)

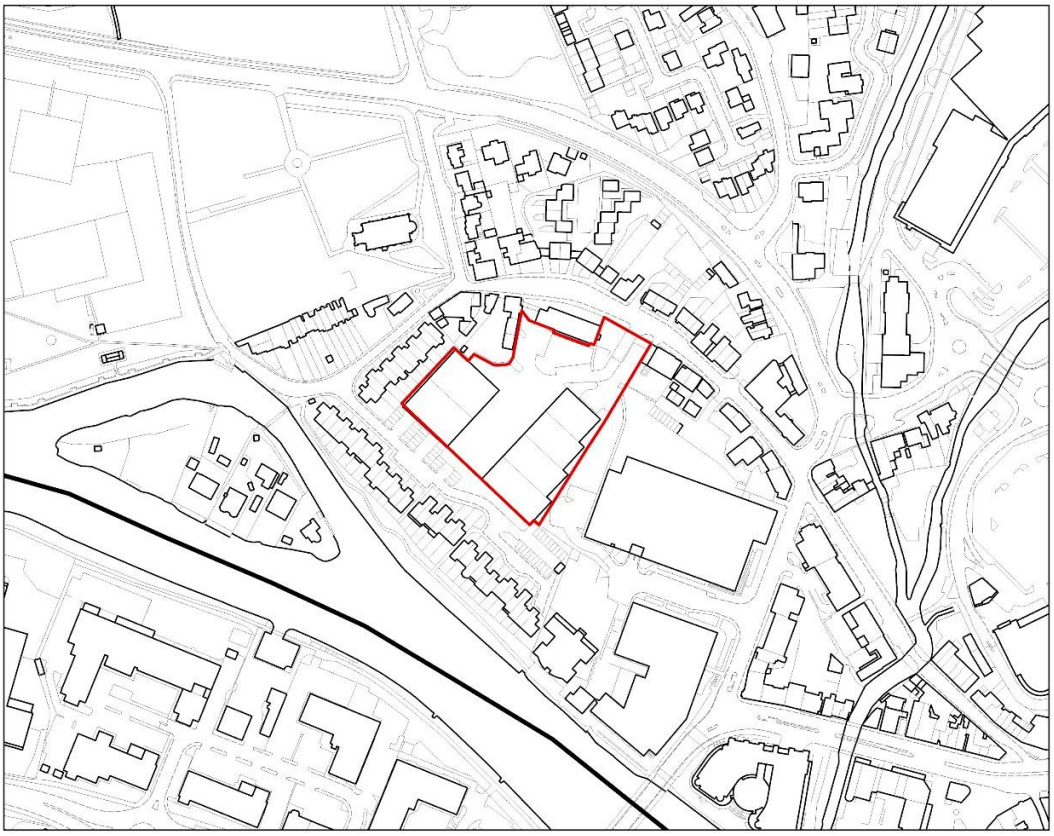
Site Information	
Site ID	ST3/014
Site name/ address	Birch House/London Road, Fairfield Avenue, Staines, TW18 4AB
Site area (ha)	1.25
Location	Urban area, previously developed land
Ward	Staines
Proposed Allocation	Residential (C3): up to 400 units (approx.) (net) Commercial (Class E): 1200 sqm (approx.)

Site description & existing use	The existing site currently consists of numerous retail and office buildings of various ages and a multi storey car park. These include One London Road and Birch House which are four and five storey office buildings with front onto London Road and Fairfield Avenue respectively. Located within Staines-Upon-Thames, the site is situated in a densely built-up site, bounded by London Road to the south and Fairfield Avenue to the north. Historically the site and the immediate area was predominantly a commercial area but the string of new residential developments has led to a much more residential area.
Site-specific requirements[100]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • A mixed residential and commercial development that provides an active street frontage. • A well-designed scheme that has a positive relationship with nearby town centre uses. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible. • Applicants are encouraged to develop the detailed design of the site in collaboration with the LPA. Use of a Design Review Panel will be encouraged where it is considered that it can positively shape development.
Opportunities	• This plot within the town centre lends itself to a high-quality scheme that makes a positive contribution to the wider street scene. • Provide positive benefits in terms of landscape and townscape character and local distinctiveness. • Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options.
Delivery Timeframe	2029-2033 (years 6-10)

[100] Refer to Policy ID2 in regard to sustainable transport for new developments.

ST4/004 (96-104 Church Street, Staines)

Site Information	
Site ID	ST4/004
Site name/ address	96-104 Church Street, Staines, TW18 4QF
Site area (ha)	0.88
Location	Urban area Previously developed land
Ward	Staines
Proposed Allocation	Residential (C3): up to 100 units (approx.)



Site description & existing use	The site is situated on southern side of Church Street within the urban area, to the west of Staines town centre. The site is some 0.89 hectares in area and currently consists of 6 warehouse buildings and an associated access road and hard standing along with parking spaces for the three-storey office block to the north of the site fronting Church Street which is locally listed, whilst the gate and railings are Grade II listed. There is access via Church Street between Magna House and No. 96-104. The warehouse buildings are located towards the rear of the site. These buildings face into the site, with hard standing between.

	The elevations of some of these buildings make up the boundary treatment with the adjacent residential developments. Church Street is within Staines Conservation Area and consists of properties, with varying ages and styles, however it is largely residential and 2-storeys in nature, with traditional pitched roofs. There are some commercial uses located further east.
Site-specific requirements[101]	The site will not be available for development until a safe route for access and egress can be provided and maintained during a flood event (i.e. the 1% AEP fluvial flood event and surface water event including an appropriate climate change allowance). In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • A well-designed scheme that has a positive relationship with nearby town centre uses and residential properties. • Conserve and, where possible, enhance Staines Conservation Area and the setting of nearby listed buildings along Church Street. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible. • Applicants are encouraged to develop the detailed design of the site in collaboration with the LPA. Use of a Design Review Panel will be encouraged where it is considered that it can positively shape development.
Opportunities	• This plot at the edge of the town centre lends itself to a high-quality scheme that makes a positive contribution to the wider street scene. • Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options.
Delivery Timeframe	2029-2033 (years 6-10)

[101] Refer to Policy ID2 in regard to sustainable transport for new developments.

ST4/019 (Former Debenhams Site, High Street)

Site Information	
Site ID	ST4/019
Site name/ address	35-45 High Street, Staines (Former Debenhams Site), TW18 4QU
Site area (ha)	0.24
Location	Urban area Previously developed land
Ward	Staines
Proposed Allocation	Residential (C3): up to 150 units (approx.) Commercial (Class E): 500 sqm (approx.)
Site description & existing use	The site is located to the south of the High Street and is on the corner where the road meets the A308/Thames Street. The site is located to the northwest of Elmsleigh Shopping Centre. The surrounding area is predominantly commercial as the site is located within the Borough's primary shopping area. The site is currently occupied by a four-storey department store, now vacant. The site is locally listed.

Site-specific requirements[102]	The site will not be available for development until a safe route for access and egress can be provided and maintained during a flood event (i.e. the 1% AEP fluvial flood event and surface water event including an appropriate climate change allowance). In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • A mixed residential and commercial development that provides an active frontage along the High Street. • A well-designed scheme that has a positive relationship with the surrounding town centre uses. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible. • Applicants are encouraged to develop the detailed design of the site in collaboration with the LPA. Use of a Design Review Panel will be encouraged where it is considered that it can positively shape development.
Opportunities	• This plot within the town centre lends itself to a high-quality scheme that makes a positive contribution to the wider street scene. • Provide positive benefits in terms of landscape and townscape character and local distinctiveness. • Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options.
Delivery Timeframe	2029-2033 (years 6-10)

[102] Refer to Policy ID2 in regard to sustainable transport for new developments.

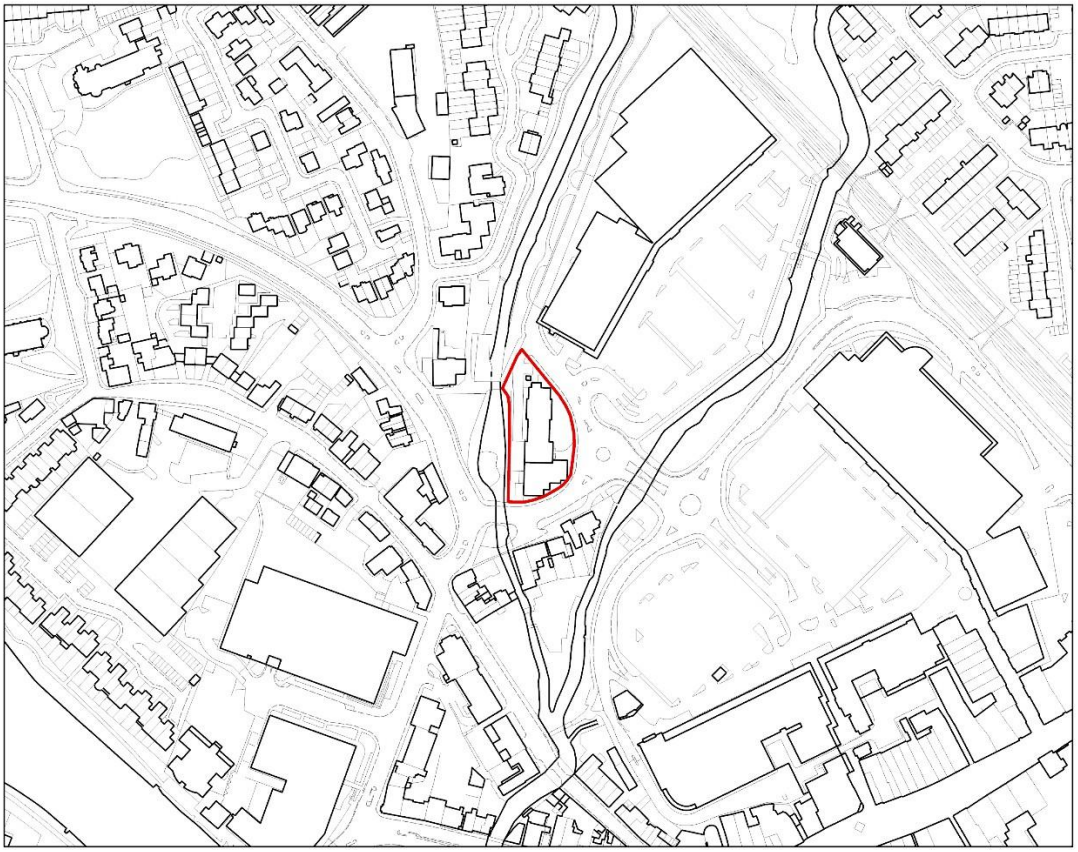
ST4/023 (Two Rivers Retail Park Terrace, Mustard Mill Road, Staines)

Site Information	
Site ID	ST4/023
Site name/ address	Two Rivers Retail Park Terrace, Mustard Mill Road, Staines
Site area (ha)	2.29
Location	Urban area, previously developed land
Ward	Staines
Proposed Allocation	Residential (C3): up to 750 units (approx.) Ground floor commercial/community use
Site description & existing use	The site is located to the west of the River Colne and the East of the River Wraysbury. The site is located to the northwest of Mustard Mill Road, comprising the Retail Park terrace with large retail units and a surface carpark occupying the site.

Site-specific requirements[103]	The site will not be available for development until a safe route for access and egress can be provided and maintained during a flood event (i.e. the 1% AEP fluvial flood event and surface water event including an appropriate climate change allowance). • Provision of residential amenity space within the development site. • Suitable reprovision of shoppers' parking • A well-designed scheme that has a positive relationship with nearby town centre uses and nearby residential properties. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible. • Applicants are encouraged to develop the detailed design of the site in collaboration with the LPA. Use of a Design Review Panel will be encouraged where it is considered that it can positively shape development.
Opportunities	• This plot within the town centre lends itself to a high-quality scheme that makes a positive contribution to the wider street scene. • Provide positive benefits in terms of landscape and townscape character and local distinctiveness. • Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options. • Improvements to nearby open space.
Delivery Timeframe	2029-2033 (years 6-10)

[103] Refer to Policy ID2 in regard to sustainable transport for new developments.

ST4/024 (Frankie & Benny's/Travelodge, Two Rivers, Hale Street, Staines)

Site Information	
Site ID	ST4/024
Site name/ address	Frankie & Benny's/Travelodge, Two Rivers, Hale Street, Staines, TW18 4UW
Site area (ha)	0.24
Location	Urban area Previously developed land
Ward	Staines
Proposed Allocation	Residential (C3): up to 55 units (approx.)
	
Site description & existing use	The area is currently occupied by a restaurant and hotel use in Hale Street. The existing buildings were erected in the early 2000's. The site is within Staines Town Centre. To the north lies the Two River Retail Park Terrace, while to the south on the other side of the road are 16 – 24 Hale Street. To the east is the Two Rivers Shopping Centre, while to the west is the Wraysbury River. The site is located with the Staines Conservation Area.

Site-specific requirements[104]	The site will not be available for development until a safe route for access and egress can be provided and maintained during a flood event (i.e. the 1% AEP fluvial flood event and surface water event including an appropriate climate change allowance). In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • A well-designed scheme that has a positive relationship with nearby town centre uses and residential properties. • Include measures to mitigate the impact of development on the local road network and take account of impacts on the strategic road network as identified through a site-specific Travel Plan and Transport Assessment. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible.
Opportunities	• This plot at the edge of the town centre lends itself to a high-quality scheme that makes a positive contribution to the wider street scene. • Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options.
Delivery Timeframe	2029-2033 (years 6-10)

[104] Refer to Policy ID2 in regard to sustainable transport for new developments.

AS2/001 (Ashford Youth Club, Kenilworth Road)

Site Information	
Site ID	AS2/001
Site name/ address	Ashford Youth Club, Kenilworth Road, Ashford, TW15 3EL
Site area (ha)	0.25
Location	Urban area Previously developed land
Ward	Ashford North and Stanwell South
Proposed Allocation	Local Community F2(b): 500sqm Youth Centre (approx.) Residential (C3): 5 units (approx.)
Site description & existing use	The site is currently occupied by a youth club and is located within a predominantly residential area. The site is bounded to the north by Kenilworth Road and to the south by Cumberland Road.
Site-specific requirements	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following:

	• Retention of the youth club and associated open space on site, as part of a mixed use scheme, or relocation to a suitable alternative site. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Through provision of landscaping and boundary planting provide net gains in biodiversity; This will need to be demonstrated through appropriate habitat/species surveys and implementation of management plans. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible.
Opportunities	• High-quality mixed-use scheme designed to make a positive contribution to the wider area and character.
Delivery Timeframe	2029-2033 (years 6-10)

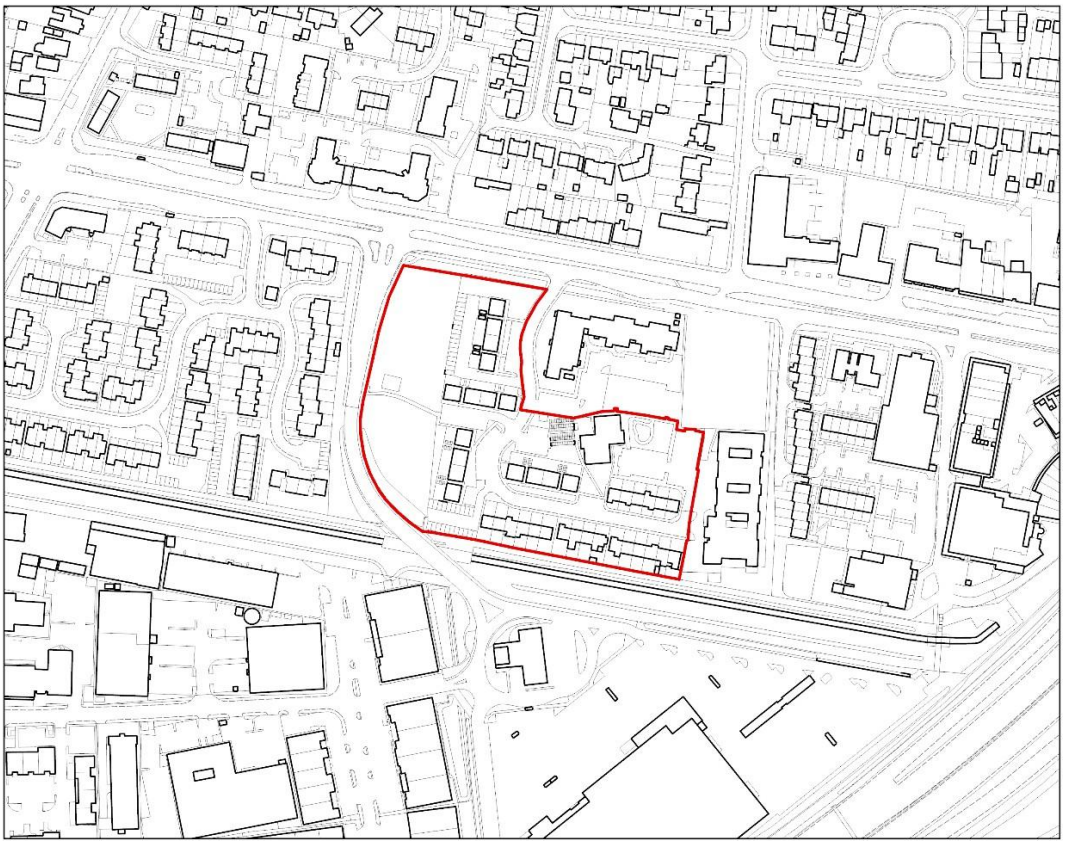
AT3/016 (23-31 (not 11-19) Woodthorpe Road)

Site Information	
Site ID	AT3/016
Site name/ address	23-31 (not 11-19) Woodthorpe Road, Ashford, TW15 2RP
Site area (ha)	0.24
Location	Urban area Previously developed land
Ward	Ashford Town
Proposed Allocation	Residential (C3): 120 units (approx.) Ground floor office/retail (Class E): 1300 sqm (approx.)
Site description & existing use	The site is an L shaped plot of land to the west of Station Approach with Woodthorpe Road to the south. The site comprises two parcels of land, made up of office, retail and residential buildings. The wider area is urban in character with commercial and residential uses present.

Site-specific requirements[105]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • A mixed-use development comprising residential development and ground floor retail/office use to provide an active commercial frontage. • A well-designed scheme that has a positive relationship with nearby town centre uses and residential properties. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible. • Applicants are encouraged to develop the detailed design of the site in collaboration with the LPA. Use of a Design Review Panel will be encouraged where it is considered that it can positively shape development.
Opportunities	• This L-shaped plot lends itself to a well-designed scheme that makes a positive contribution to the wider street scene. • Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options.
Delivery Timeframe	2029-2033 (years 6-10)

[105] Refer to Policy ID2 in regard to sustainable transport for new developments.

SC1/021 (Land at Spelthorne Grove)

Site Information	
Site ID	SC1/021
Site name/ address	Land at Spelthorne Grove, Sunbury, TW16 7BZ
Site area (ha)	2.1
Location	Urban area Previously developed land
Ward	Sunbury Common
Proposed Allocation	Estate regeneration providing residential (C3): 250 net additional units (approx.). A total of 458 gross (approx.) given existing provision Open space: Retention of existing or reprovision within the wider site.
	
Site description & existing use	The site is located to the south of Staines Road West and is occupied by a housing estate. The western part of the site comprises an open space and recreation area, with flatted development along the northern and central areas with houses along the southern boundary. Approximately 208 units currently occupy the site. To the west runs Escot Road which links to the Tesco Extra site to the south. The wider area is urban in character with residential and commercial uses the dominant uses.

Site-specific requirements[106]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • Financial contributions to provide enhanced and usable open space and play facilities for all members of the community shall be made on the net additional provision, along with like for like replacement of that lost. The financial contributions should be substantially directed towards to the area of open space immediately to the west of the site (indicated by the blue line on the site plan) unless otherwise agreed by the Council. On site infrastructure to support sustainable modes of transport should be provided on the net additional provision. The layout and design of the site should maximise its connectivity to the existing active travel network. • Include measures to mitigate the impact of development on the local road network and take account of impacts on the strategic road network as identified through a site-specific Travel Plan and Transport Assessment. Any proposed reduction in parking will need to have regard to Footnote [1] of Policy ID2. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the net additional dwellings acceptable in planning terms, unless a viability assessment peer reviewed by an independent assessor on behalf of the Council (but paid for by the developer) proves it is not viable to do so. • A suitable decanting plan for the existing properties as to minimise the disruption for current residents. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible unless a viability assessment peer reviewed by an independent assessor on behalf of the Council (but paid for by the developer) proves it is not viable to do so. • Any developer of the site will not be required to provide self and custom build housing in accordance with H1(13) and (14).

[106] Refer to Policy ID2 in regard to sustainable transport for new developments.

Opportunities	• This plot provides an opportunity for high density development in a well-designed scheme that makes a positive contribution to the wider street scene and integrates the open space visually and physically to the residential development. • Improvements for pedestrian access and public realm linking the site to nearby services with active and sustainably travel options. • Spelthorne Parking Standards will be used as a guide for determining the appropriate level of on site parking provision and Surrey County Council Guidance on electric vehicle standards for the net additional dwellings. Opportunities for a car club, accessible car parking space, electric vehicle charging points; and cycle parking to serve the development to mitigate the traffic impacts, secured through a site specific Travel Plan, will be supported.
Delivery Timeframe	2029-2033 (years 6-10)

Years 11-16 (2034-2039/40)

AT3/009 (Ashford Telephone Exchange, Church Road)

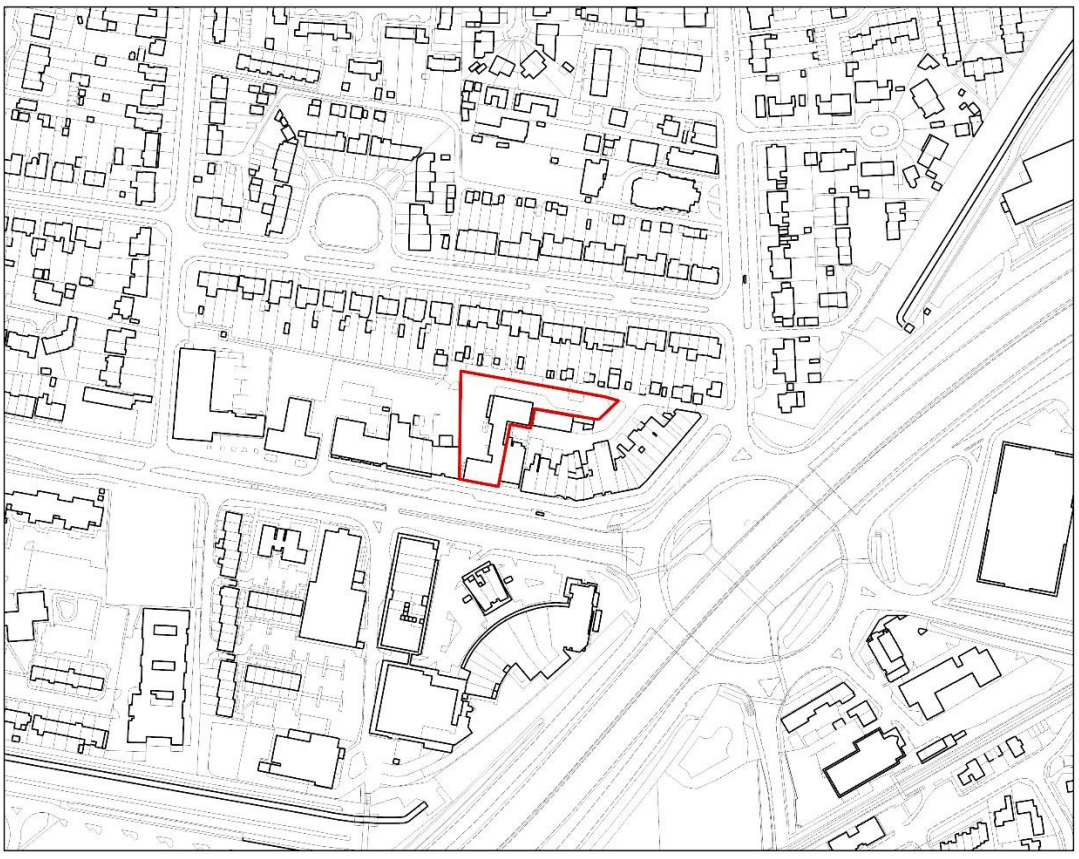
Site Information	
Site ID	AT3/009
Site name/ address	Ashford Telephone Exchange, Church Road, Ashford, TW15 2TS
Site area (ha)	0.26
Location	Urban area Previously developed land
Ward	Ashford Town
Proposed Allocation	Residential (C3): 20 units (approx.)

Site description & existing use	The existing Telephone Exchange is located to the north of Church Road. The site is made up of three separate buildings with a parking area for approximately 10 vehicles to the side. The site is adjacent to former Brooklands College site and Studholme Medical Centre and opposite the Co-op convenience store.
Site-specific requirements[107]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Relocation of the existing use prior to development. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible.
Opportunities	• This rectangular plot lends itself to a well-designed scheme that makes a positive contribution to the wider street scene. • Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options.
Delivery Timeframe	2034-2039/40 (years 11-16)

[107] Refer to Policy ID2 in regard to sustainable transport for new developments.

SC1/013 (RMG Warehouse & Delivery Office, Staines Road West)

Site Information	
Site ID	SC1/013
Site name/ address	RMG Warehouse & Delivery Office, 47-49 Staines Road West, Sunbury, TW16 7AA
Site area (ha)	0.25
Location	Urban area Previously developed land
Ward	Sunbury Common
Proposed Allocation	Residential (C3): 22 units (approx.) Ground floor office/retail (Class E): 500 sqm (approx.)



Site description & existing use	The site is occupied by warehousing units accessed from Vicarage Road to the east. The site is L shaped, with a commercial unit fronting Staines Road West and The Parade. The surrounding area is largely commercial in character with commercial units present along The Parade and opposite at Sunbury Cross. Residential uses are also located in the wider area which is largely high density in character.
Site-specific requirements[108]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • Include measures to mitigate the impact of development on the local road network and take account of impacts on the strategic road network as identified through a site-specific Travel Plan and Transport Assessment; • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Relocation of the existing use prior to development. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible.
Opportunities	• This plot lends itself to a well-designed scheme that makes a positive contribution to the wider street scene. • Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options.
Delivery Timeframe	2034-2039/40 (years 11-16)

[108] Refer to Policy ID2 in regard to sustainable transport for new developments.

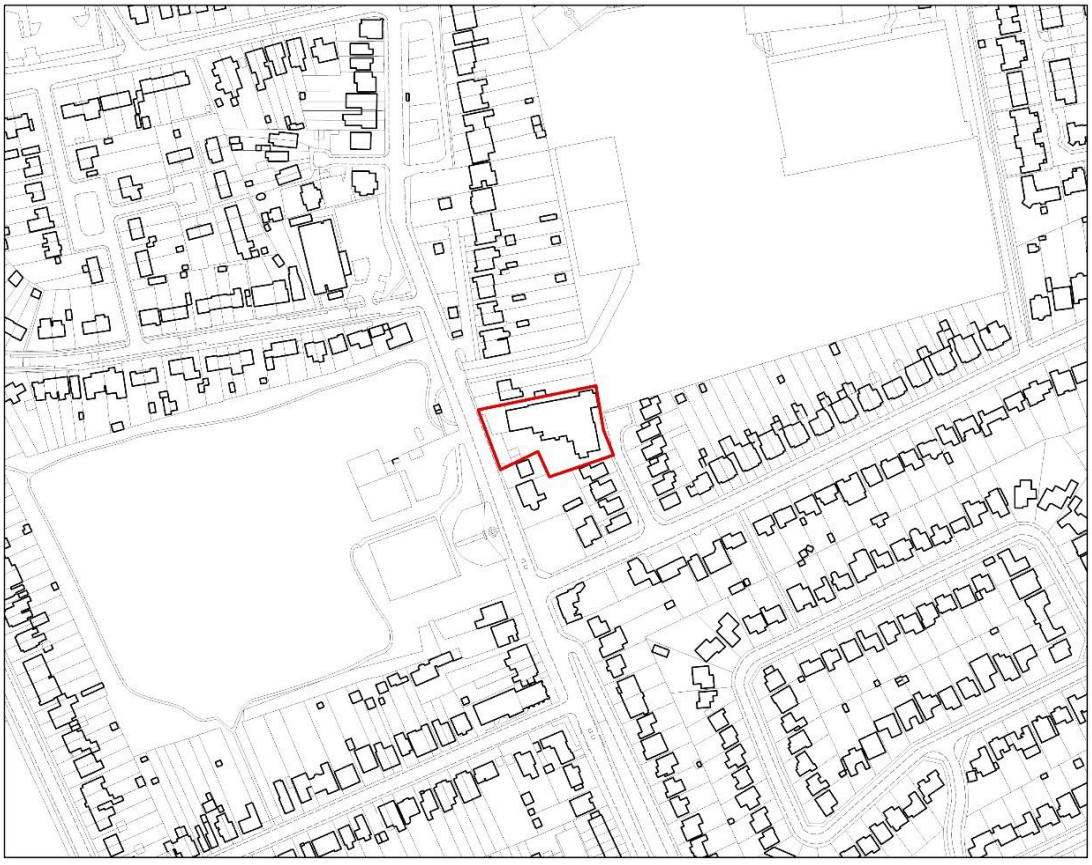
SE1/003 (Builder's Yard, Staines Road East)

Site Information	
Site ID	SE1/003
Site name/ address	Builder's Yard, 77 Staines Road East, TW16 5AD
Site area (ha)	0.75
Location	Urban area, brownfield land.
Ward	Sunbury East
Proposed Allocation	Residential (C3): 75 units (approx.)
Site description & existing use	The site is currently occupied by a builder's yard and is accessed from Staines Road East. Buildings occupy the western part of the site with open storage and parking to the east. Trees line the site on both sides with the railway line to the north of the site. The local area is predominantly residential in character with flats in front of the western part of the site. Houses sit across Staines Road East with garden land immediately opposite. Properties neighbour the west and east of the site and the old police station

	sits to the southwest. A large number of mature trees are located around the site.
Site-specific requirements[109]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • Through provision of landscaping and boundary planting provide net gains in biodiversity; This will need to be demonstrated through appropriate habitat/species surveys and implementation of management plans. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible. • Applicants are encouraged to develop the detailed design of the site in collaboration with the LPA. Use of a Design Review Panel will be encouraged where it is considered that it can positively shape development.
Opportunities	• This plot lends itself to a well-designed scheme that makes a positive contribution to the wider street scene. • Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options.
Delivery Timeframe	2034-2039/40 (years 11-16)

[109] Refer to Policy ID2 in regard to sustainable transport for new developments.

SE1/008 (Telephone Exchange, Green Street)

Site Information	
Site ID	SE1/008
Site name/ address	Telephone Exchange, Green Street, Sunbury, TW16 6QJ
Site area (ha)	0.25
Location	Urban area Previously developed land
Ward	Sunbury East
Proposed Allocation	Residential (C3): 14 units (approx.)
	
Site description & existing use	The site is currently occupied by the BT Telephone Exchange. It is a 2-storey detached building, with an older property fronting the site and mid-20th century additions to the rear and east. The surrounding area is largely residential in character, with properties detached or semi-detached dwellings. St Paul's College sits to the east of the site whilst Cedars Recreation Ground is to the west.

Site-specific requirements[110]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Relocation of the existing use prior to development. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible.
Opportunities	• This rectangular plot lends itself to a well-designed scheme that makes a positive contribution to the wider street scene. • Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options.
Delivery Timeframe	2034-2039/40 (years 11-16)

[110] Refer to Policy ID2 in regard to sustainable transport for new developments.

SH1/010 (Shepperton Library, High Street)

Site Information	
Site ID	SH1/010
Site name/ address	Shepperton Library, High Street, Shepperton, TW17 9AU
Site area (ha)	0.14
Location	Urban area Previously developed land
Ward	Shepperton Town
Proposed Allocation	Residential (C3): 10 units (approx.) Ground floor community use (Class F): 250sqm (approx.) or re-provision off site
Site description & existing use	The site is currently occupied by Shepperton Library, a single storey building set back from the road by a forecourt with a small amount of parking, and with a small, grassed area. The site fronts onto Shepperton High Street between the BP petrol filling station and a former bank premises. The surrounding area largely commercial in character on the ground floor with residential uses on the upper storeys of buildings.

Site-specific requirements [111]	The site will not be available for development until a safe route for access and egress can be provided and maintained during a flood event (i.e. the 1% AEP fluvial flood event and surface water event including an appropriate climate change allowance). • In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: A housing scheme subject to the existing use being re- provided off site in location accessible to the community, prior to redevelopment, or a mixed-use scheme incorporating ground floor community uses. • A well-designed scheme that has a positive relationship with nearby town centre uses and residential properties. • Include measures to mitigate the impact of development on the local road network and take account of impacts on the strategic road network as identified through a site- specific Travel Plan and Transport Assessment. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible.
Opportunities	• This plot lends itself to a well-designed scheme that makes a positive contribution to the wider street scene. Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options.
Delivery Timeframe	2034-2039/40 (years 11-16)

[111] Refer to Policy ID2 in regard to sustainable transport for new developments.

SH1/015 (Shepperton Youth Centre, Shepperton Court Drive)

Site Information	
Site ID	SH1/015
Site name/ address	Shepperton Youth Centre, Shepperton Court Drive, Shepperton, TW17 8EJ
Site area (ha)	0.31
Location	Urban area, previously developed land
Ward	Shepperton Town
Proposed Allocation	Local Community F2(b): 700sqm Youth Centre (approx.) and associated outdoor space Residential (C3): 24 units (approx.)
Site description & existing use	The site is located to the south of the B376, with the M3 to the north and Shepperton Health centre immediately southeast. Manor Mead school is situated to the southwest and residential development at Shepperton Court is located to the south of the site. The surrounding character is mixed in nature, with various community and residential uses neighbouring the site.

Site-specific requirements	The site will not be available for development until a safe route for access and egress can be provided and maintained during a flood event (i.e. the 1% AEP fluvial flood event and surface water event including an appropriate climate change allowance). In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • Retention of the youth club and associated open space on site (including the basketball court and skatepark), as part of a mixed-use scheme, or relocation to a suitable alternative site in a location accessible to the community. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Through provision of landscaping and boundary planting provide net gains in biodiversity; This will need to be demonstrated through appropriate habitat/species
Opportunities	• High-quality mixed-use scheme designed to make a positive contribution to the wider area and character. • Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options.
Delivery Timeframe	2034-2039/40 (years 11-16)

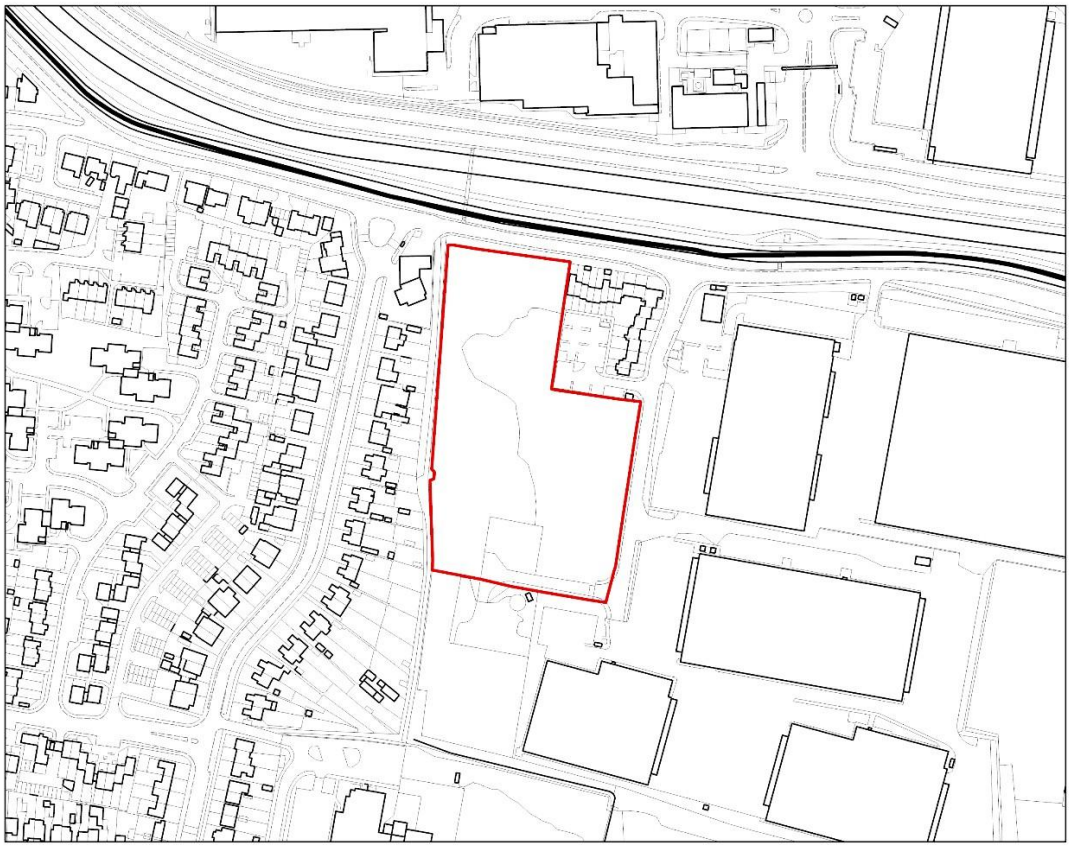
SH2/003 (Shepperton Delivery Office, High Street)

Site Information	
Site ID	SH2/003
Site name/ address	Shepperton Delivery Office, 47 High Street, Shepperton, TW17 9AA
Site area (ha)	0.17
Location	Urban area Previously developed land
Ward	Shepperton Town
Proposed Allocation	Residential (C3): 10 units (approx.) Ground floor Retail (Class E): 400sqm (approx.)
Site description & existing use	The site is occupied by a Royal Mail delivery office and two retail units, with a single storey building fronting the High Street and a two-storey building set back. An area of hardstanding used for parking is located on the western part of the site. The surrounding area is largely commercial in character, with retail uses located adjacent along the High Street at ground floor level. Residential uses are largely present on the upper floors. A petrol filling station is located opposite the site.

Site-specific requirements [112]	The site will not be available for development until a safe route for access and egress can be provided and maintained during a flood event (i.e. the 1% AEP fluvial flood event and surface water event including an appropriate climate change allowance). In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • A mixed-use scheme comprising ground floor retail use (Class E) and residential units above on upper floors. • A well-designed scheme that has a positive relationship with nearby town centre uses and residential properties. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy
Opportunities	• This plot lends itself to a well-designed scheme that makes a positive contribution to the wider street scene. • Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options.
Delivery Timeframe	2034-2039/40 (years 11-16)

[112] Refer to Policy ID2 in regard to sustainable transport for new developments.

SN1/005 (Land at Northumberland Close)

Site Information	
Site ID	SN1/005
Site name/ address	Land at Northumberland Close, Stanwell, TW19 7LN
Site area (ha)	1.75
Location	Greenfield land Former Green Belt
Ward	Stanwell North
Proposed Allocation	Residential (C3): 80 units (approx.)
	
Site description & existing use	The site is currently undeveloped and is situated on the western side of Northumberland Close. Trees line the north and west of the site. The site is surrounded by development on three sides, with residential development to the west, commercial uses to the east and Heathrow Airport further north past Bedfont Road and Longford River. There is a small area of housing adjoining the site called Cleveland Park.

Site-specific requirements[113]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • A high-quality residential scheme. • Adequate screening of the site against the adjacent commercial uses. • 50% Affordable Housing [subject to viability testing] • Through provision of landscaping and boundary planting provide net gains in biodiversity; This will need to be demonstrated through appropriate habitat/species surveys and implementation of management plans. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible. • Applicants are encouraged to develop the detailed design of the site in collaboration with the LPA. Use of a Design Review Panel will be encouraged where it is considered that it can positively shape development.
Opportunities	• Improved pedestrian linkages to Long Lane Recreation Ground. • High quality designed scheme to make a positive contribution to the wider area and to aid regeneration of the area. • The proposed residential access could be configured to ensure that traffic uses do not exacerbate local highways issues. Movement of junction or widening of existing access could contribute to an improved access into the site.
Delivery Timeframe	2034-2039/40 (years 11-16)

[113] Refer to Policy ID2 in regard to sustainable transport for new developments.

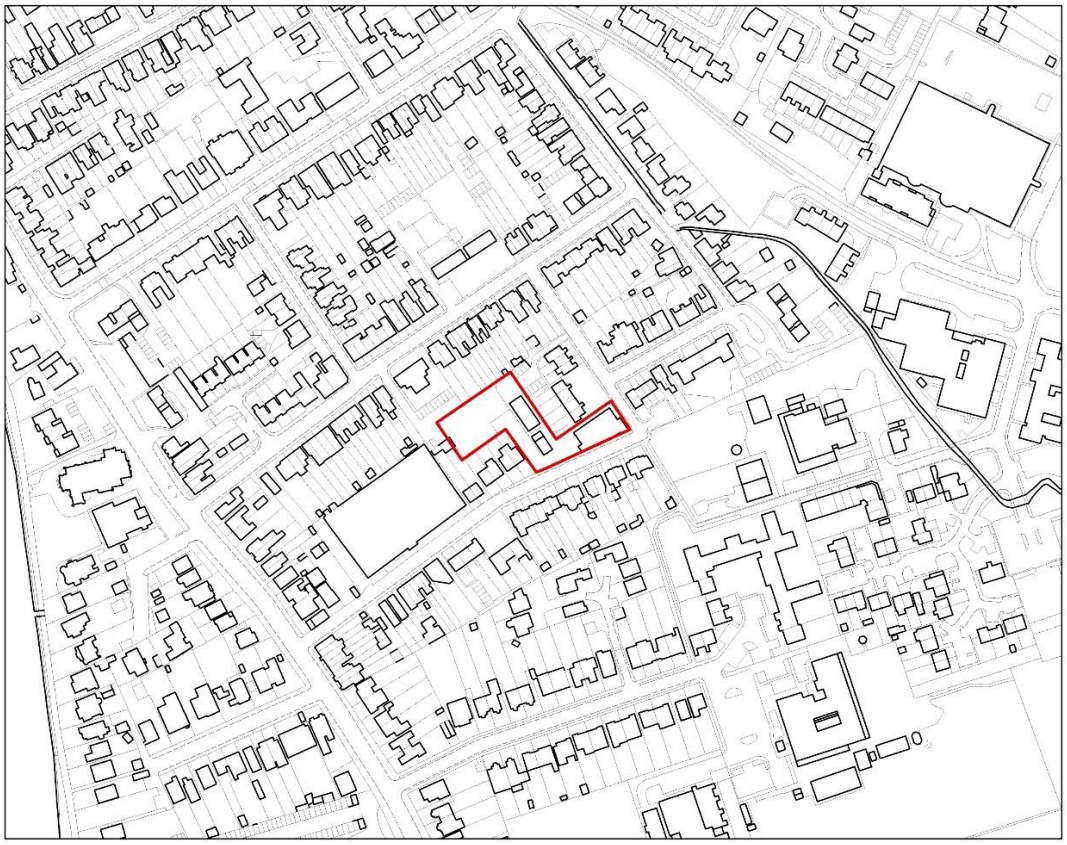
ST1/028 (Leacroft Centre, Leacroft, Staines)

Site Information	
Site ID	ST1/028
Site name/ address	Leacroft Centre, Leacroft, Staines, TW18 4PB
Site area (ha)	0.15
Location	Urban area, previously developed land
Ward	Staines
Proposed Allocation	Residential (C3): 17 units (approx.) Ground floor community units or re-provision off site
Site description & existing use	The site is currently occupied by the Leacroft Youth Centre, a two-storey rectangular-shaped building. The building was formerly occupied by a drill hall and dates from the 1910s. The site lies on the corner of Leacroft and Raleigh Court. The surrounding area is largely residential in character with single storey and semi-detached dwellings neighbouring the site. Further south of the site are a number of flatted 2-3 storey flatted developments.

Site-specific requirements[114]	The site will not be available for development until a safe route for access and egress can be provided and maintained during a flood event (i.e. the 1% AEP fluvial flood event and surface water event including an appropriate climate change allowance). In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • A housing scheme subject to the existing use being re-provided off site in a location accessible to the community, prior to redevelopment, or a mixed use scheme incorporating ground floor community uses. • Include measures to mitigate the impact of development on the local road network and take account of impacts on the strategic road network as identified through a site-specific Travel Plan and Transport Assessment. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible.
Opportunities	• This plot lends itself to a well-designed scheme that makes a positive contribution to the wider street scene. • Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options.
Delivery Timeframe	2034-2039/40 (years 11-16)

[114] Refer to Policy ID2 in regard to sustainable transport for new developments.

ST1/031 (Thameside Arts Centre, Wyatt Road)

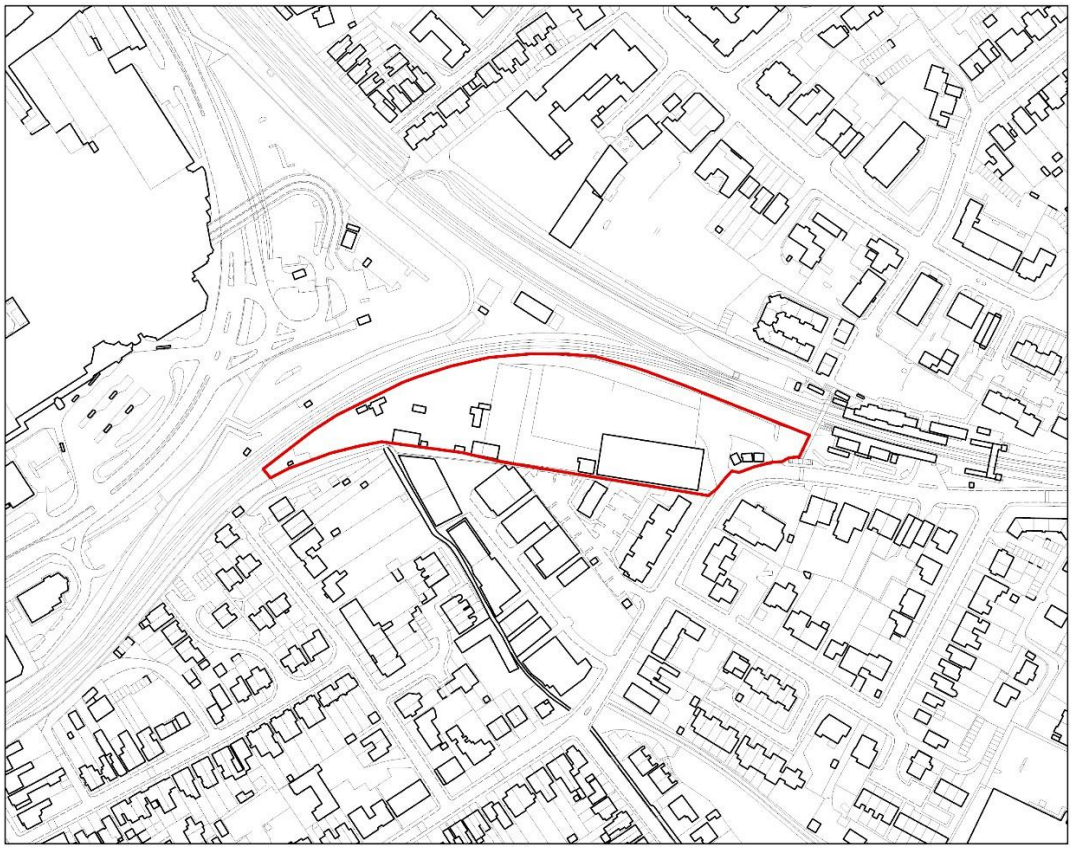
Site Information	
Site ID	ST1/031
Site name/ address	Thameside Arts Centre, Wyatt Road, Staines, TW18 2AY
Site area (ha)	0.26
Location	Urban area Previously developed land
Ward	Staines
Proposed Allocation	Residential (C3): 19 units (approx.) Ground floor community units or re-provision off site
	
Site description & existing use	The site is occupied by Thameside Centre which currently operates as a training centre and hot-desking space. A car park and cadets building also occupy the site. The building is late Victorian, dating from 1896, and ranges from 1 to 3 storeys equivalent in height. The building is locally listed. The predominant use is in the wider area is largely residential, with both flats and family dwelling houses present. A disused tinworks site is present to the south along Langley Road with community uses to the east.

Site-specific requirements[115]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • A housing scheme subject to the existing use being re-provided off site in a location accessible to the community, prior to redevelopment, or a mixed-use scheme incorporating ground floor community uses. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible.
Opportunities	• This plot lends itself to a well-designed scheme that makes a positive contribution to the wider street scene. • Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options.
Delivery Timeframe	2034-2039/40 (years 11-16)

[115] Refer to Policy ID2 in regard to sustainable transport for new developments.

ST2/006 (Builders Yard, Gresham Road)

Site Information	
Site ID	ST2/006
Site name/ address	Builders Yard, Gresham Road, Staines, TW18 2BE
Site area (ha)	1.36
Location	Urban area Previously developed land
Ward	Staines
Proposed Allocation	Residential (C3): 343 units (approx.)



Site description & existing use	The site houses an existing builder's yard, with a large warehouse fronting onto Gresham Road. The site has a small amount of residential development to the south, mixed with commercial units. The train line bunds the northern and western boundaries with some residential properties and a large church to the east on Gresham Road. The site is on the periphery of Staines Town Centre with retail uses to the northwest.

Site-specific requirements[116]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • A well-designed scheme that has a positive relationship with nearby town centre uses and residential properties. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible. • Applicants are encouraged to develop the detailed design of the site in collaboration with the LPA. Use of a Design Review Panel will be encouraged where it is considered that it can positively shape development.
Opportunities	• This plot at the edge of the town centre lends itself to a high-quality scheme that makes a positive contribution to the wider street scene. • Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options.
Delivery Timeframe	2034-2039/40 (years 11-16)

[116] Refer to Policy ID2 in regard to sustainable transport for new developments.

ST3/012 (Staines Telephone Exchange, Fairfield Avenue)

Site Information	
Site ID	ST3/012
Site name/ address	Staines Telephone Exchange, Fairfield Avenue, TW18 4AB
Site area (ha)	0.59
Location	Urban area Previously developed land
Ward	Staines
Proposed Allocation	Residential (C3): up to 180 units (approx.)
Site description & existing use	The site is currently occupied by Telephone Exchange buildings ranging from 3 to 12 storeys in height. A large area of hardstanding is also present on the northern part of the site. The surrounding area is urban in character with a mix of residential and commercial uses present. The Renshaw Estate is located west, with residential development to the south of the site. Further residential development is located north and east of the site with offices present to the southeast.

Site-specific requirements[117]	In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • A well-designed scheme that has a positive relationship with nearby town centre uses and residential properties. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible. • Applicants are encouraged to develop the detailed design of the site in collaboration with the LPA. Use of a Design Review Panel will be encouraged where it is considered that it can positively shape development.
Opportunities	• This plot at the edge of the town centre lends itself to a high-quality scheme that makes a positive contribution to the wider street scene. • Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options.
Delivery Timeframe	2034-2039/40 (years 11-16)

[117] Refer to Policy ID2 in regard to sustainable transport for new developments.

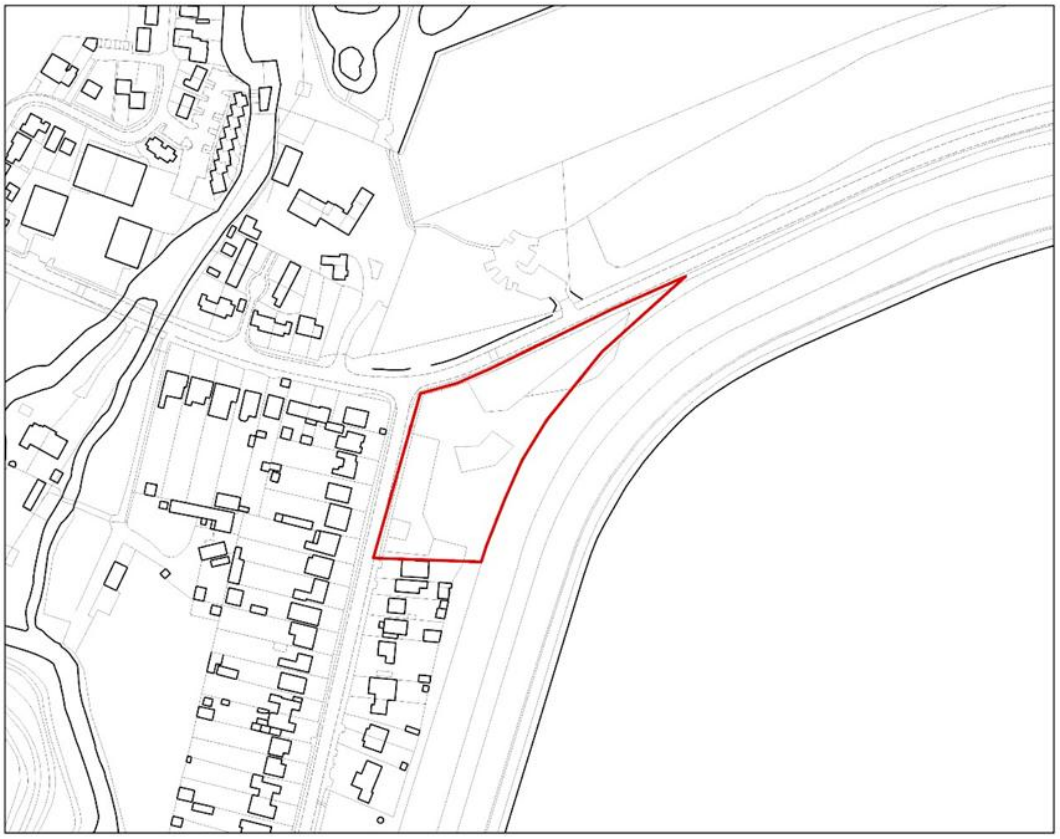
ST4/009 (Elmsleigh Centre and Adjoining Land, South Street)

Site Information	
Site ID	ST4/009
Site name/ address	Elmsleigh Centre and Adjoining Land, South Street, Staines, TW18 4QF
Site area (ha)	5.15
Location	Urban area Previously developed land
Ward	Staines
Proposed Allocation	Residential (C3): up to 850 units Retail/Commercial town centre uses (Class E)
Site description & existing use	The site is located to the south of the High Street with the A308/Thames Street wrapping around the west, south and east of the site. The site is currently occupied by the Elmsleigh shopping centre, Staines bus station, multi-storey car parks and service areas. A surface car park is present to the east with retail units to the north and the Two Rivers Shopping Centre further north.

	The surrounding area is predominantly commercial as the site is located within the Borough's primary shopping area.
Site-specific requirements[118]	In order to ensure that future development does not increase the risk of flooding to the surrounding areas, the built footprint of the new development should not exceed that of the existing building and where possible should be reduced. The site layout will be required to be designed to ensure all development is able to access the safe route for access and egress (shown within the SFRA Level 2) during a flood event (i.e. the 1% AEP fluvial flood event and surface water event including an appropriate climate change allowance). In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • A mixed residential and commercial development that provides an active street frontage. • If required, reconfigure the existing bus station or relocate to a suitable town centre location to ensure the continuity of bus services within Staines. • A well-designed scheme that has a positive relationship with nearby town centre uses. • Retention of the museum, library and community centre on site, or relocation to a suitable alternative town centre location. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible. • Applicants are encouraged to develop the detailed design of the site in collaboration with the LPA. Use of a Design Review Panel will be encouraged where it is considered that it can positively shape development.
Opportunities	This plot within the town centre lends itself to a high- quality scheme that makes a positive contribution to the wider street scene. Provide positive benefits in terms of landscape and townscape character and local distinctiveness. Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options.
Delivery Timeframe	2034-2039/40 (years 11-16)

[118] Refer to Policy ID2 in regard to sustainable transport for new developments.

ST4/025 (Coppermill Road)

Site Information	
Site ID	ST4/025
Site name/ address	Coppermill Road, Wraysbury, TW19 5NU
Site area (ha)	0.92
Location	Greenfield land Former Green Belt
Ward	Staines
Proposed Allocation	Residential (C3): 15 units (approx.)
	
Site description & existing use	The site is undeveloped greenfield land. It is located on the edge of Spelthorne and adjacent to linear residential development along Coppermill Road to the south. The nearby residential dwellings are within the Royal Borough of Windsor and Maidenhead and are designated Green Belt. The site is bounded by the Wraysbury Reservoir to the east, residential to the south and west and Woodland to the north.

Site-specific requirements[119]	The site will not be available for development until a safe route for access and egress can be provided and maintained during a flood event (i.e. the 1% AEP fluvial flood event and surface water event including an appropriate climate change allowance). In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • Provision of 15 residential dwellinghouses (approx.) • Improved pedestrian linkages to nearby community facilities and existing active travel routes, including the provision of crossing facilities along Coppermill Road. • Liaise with the relevant service providers, including Royal Borough of Windsor and Maidenhead, to ensure that appropriate waste management is incorporated into proposals. • The enhancement of boundary planting should be used as an opportunity to provide net gains in biodiversity. This will need to be demonstrated through appropriate habitat/species surveys and implementation of management plans. • Strengthening of the adjacent Green Belt boundaries to retain its performance and strategic role beyond the site. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible. • It is expected that the detailed design for this site will be developed in collaboration with the applicant, a design review panel and the Council.
Opportunities	• Development should contribute to the enhancement of public transport, walking and cycling infrastructure and links to local town centres and other destinations such as places of employment, services and leisure in order to minimise traffic generation and improve the connectivity. Appropriate linkages with the Spelthorne Local Cycling and Walking Infrastructure Plan. • The site should accommodate a scheme of high-quality design that makes a positive contribution to the wider environment and character.
Delivery Timeframe	2034-2039/40 (years 11-15)

[119] Refer to Policy ID2 in regard to sustainable transport for new developments.

ST4/026 (Communications House, South Street, Staines)

Site Information	
Site ID	ST4/026
Site name/ address	Communications House, South Street, Staines, TW18 4QE
Site area (ha)	0.25
Location	Urban area Previously developed land
Ward	Staines
Proposed Allocation	Residential (C3): up to 120 units (approx.)
Site description & existing use	Communications House lies on the junction of South Street and Thames Street, with access from South Street. The building is currently in office use and is part six and part five storeys. The site backs onto Friends Walk / the Elmsleigh Centre and is adjacent to Staines Bus Station. To the west is the Thames Lodge hotel and to the south is Thameside House and the railway line with residential development beyond this. To the north of the site lies Staines

Site-specific requirements[120]	The site will not be available for development until a safe route for access and egress can be provided and maintained during a flood event (i.e. the 1% AEP fluvial flood event and surface water event including an appropriate climate change allowance). In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • A well-designed scheme that has a positive relationship with nearby town centre uses. • Incorporate flood risk mitigation measures to alleviate the risk of fluvial and surface water flooding, in accordance with Policy E2. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible. • Applicants are encouraged to develop the detailed design of the site in collaboration with the LPA. Use of a Design Review Panel will be encouraged where it is considered that it can positively shape development.
Opportunities	• This plot within the town centre lends itself to a high quality scheme that makes a positive contribution to the wider street scene. • Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options.
Delivery Timeframe	2034-2039/40 (years 11-15)

[120] Refer to Policy ID2 in regard to sustainable transport for new developments.

ST4/028 (William Hill / Vodafone/ Monsoon, High Street)

Site Information	
Site ID	ST4/028
Site name/ address	William Hill / Vodafone/ Monsoon, 91-93 High Street, Staines TW18 4PQ
Site area (ha)	0.11
Location	Urban area Previously developed land
Ward	Staines
Proposed Allocation	Residential (C3): up to 14 units (approx.) Commercial (Class E): 400 sqm (approx.) (retain existing)

Site description & existing use	The site is located on the High Street and is surrounded by a large variety of retail shops varying in height and in architecture. There are a series of larger scale developments that are planned for the local area particularly to the West and the South. The existing building at 91-93 High St is a Victorian/Edwardian Gothic style building that currently houses retail use. It rises to a maximum of three storeys. It is an attractive building which contributes positively to the streetscape of the High Street and is locally listed.

	The remainder of the site is occupied by a part of the Elmsleigh Shopping Centre, being two bays of the High St frontage to the east of the Shopping Centre frontage.
Site-specific requirements[121]	The site will not be available for development until a safe route for access and egress can be provided and maintained during a flood event (i.e. the 1% AEP fluvial flood event and surface water event including an appropriate climate change allowance). In addition to meeting the policies in the plan, any developer of this site will be required to provide the following: • A mixed residential and commercial development that provides an active frontage along the High Street. Retention of the existing retail use. • A well-designed scheme that has a positive relationship with the surrounding town centre uses. Sensitive design that retains and enhances the locally listed features on site. • Include measures to mitigate the impact of development on the local road network and take account of impacts on the strategic road network as identified through a site-specific Travel Plan and Transport Assessment. • Provide or contribute to any infrastructure as set out in the IDP and/or identified at the application stage which is necessary to make the site acceptable in planning terms. • Maximise the use of Climate Change measures and renewable energy sources, in accordance with Policy PS1 to make buildings zero carbon where possible.
Opportunities	• This plot within the town centre lends itself to a high-quality scheme that makes a positive contribution to the wider street scene. • Provide positive benefits in terms of landscape and townscape character and local distinctiveness. • Improvements for pedestrian access and public realm, linking the site to nearby services with active and sustainably travel options.
Delivery Timeframe	2034-2039/40 (years 11-16)

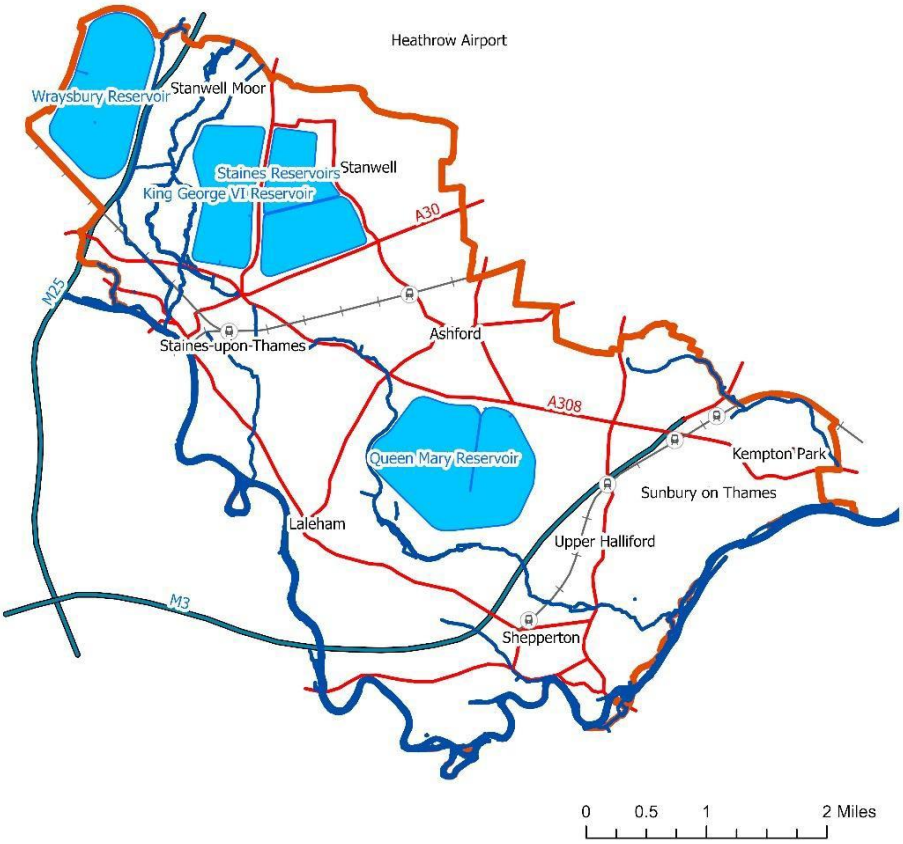
[121] Refer to Policy ID2 in regard to sustainable transport for new developments.

11. Monitoring

11.1 [Until adoption of the plan the monitoring can be found in the main body of the document adjacent to the relevant policy].

12. Appendix

Appendix A: Spatial Portrait



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Maps 2: Borough of Spelthorne

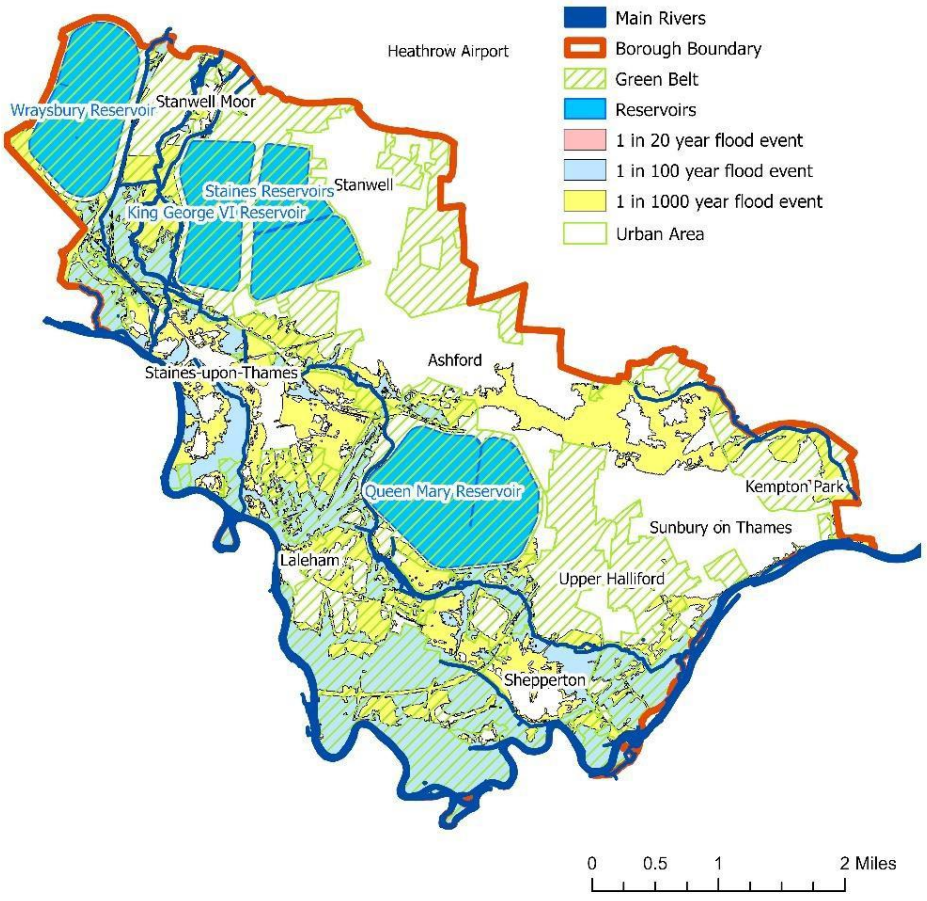
12.1 Spelthorne is located where the continuous built-up area of London gives way to a more dispersed pattern of urban areas and villages. The urban area of the Borough occupies about 35% of the total area. The larger part of the urban area of the Spelthorne lies across the middle of the Borough from east to west. Stanwell, Ashford and Sunbury comprise a continuous urban area with no separation by open land and there is only a small gap between Staines and Ashford. The settlements of Stanwell Moor, Laleham, Shepperton, Upper Halliford and Charlton Village are separate urban areas albeit by only small distances. There is a clear belt of open land separating the urban areas of Spelthorne from outer London.

12.2 Land outside the urban area covers about 65% of the Borough and is designated as Green Belt. It is part of the Metropolitan Green Belt surrounding London and has an important strategic role in containing the outward spread of the capital and providing a belt of open land for air and exercise. Locally the Green Belt serves

not only to contribute to the wider strategic function but also separates existing settlements within the Green Belt and maintaining their distinct physical identity and character. Within the Green Belt in Spelthorne are five major water supply reservoirs and a water treatment works at Ashford Common. Some areas of the Green Belt need some environmental improvement.

12.3 Spelthorne adjoins the River Thames and is crossed by two tributaries, the Ash and the Colne. The Borough is flat and low lying and consequently liable to flood. About 20% of the urban area is liable to flood in a 1 in 100 year flood event or surrounded by flood water and over 49% of the urban area would be flooded in a 1 in 1000 year event. Flood risk is a very serious threat with some 5,600 homes within the 1 in 100 flood risk area. The flood risk area affects the south and west edges of the Borough, including large parts of Staines and Shepperton and limits the scope for further development. The Environment Agency is currently developing proposals to reduce flood risk in Spelthorne and adjoining Boroughs.

12.4 Map 2 shows the area of Green Belt and flood plain in the Borough and the extent to which together they act as a constraint on development.



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Maps 3: Green Belt and Flood Risk Areas in Spelthorne

12.5 The whole of the Borough is designated as an Air Quality Management Area (AQMA) because of poor air quality. Traffic is the predominant source of air pollution in Spelthorne although traffic levels were reduced in 2020 due to the Covid-19 pandemic. The primary pollutants are nitrogen dioxide (NO_2) and particulates (PM_{10}) which result from traffic. There are elevated concentrations of NO_2 pollution in parts of Staines, around the Sunbury Cross junction of the A316/M3 at Sunbury and along the strategic roads including the A308. Close to the airport in the north of the Borough there are elevated concentrations of NO_2 due to freight traffic including HGVs.

12.6 Due to the Borough's close proximity to the airport, it experiences air pollution and other environmental impacts. Pre pandemic, over 92% of Heathrow employees who live in the Borough reached the airport by car rather than public transport which highlights poor connectivity. Undoubtedly the Borough is also affected by activities related to the operation of the airport and its associated businesses, such as logistics and distribution, which impact on air quality, the environment and the efficiency of the local and strategic road network. The 2021 Air Quality Annual Status Report was published in October 2021 and reviews monitoring data for 2020 and over a 5 year period. It is available on the Council's website[122].

12.7 Heathrow Airport, the UK's main and busiest airport lies immediately north of the Borough of Spelthorne. Currently, the proposed expansion plans which entailed major changes to the layout of the airport and the infrastructure surrounding it, faces uncertainty despite the Supreme Court's ruling in 2020 that the proposed expansion can go ahead and would not be unlawful. A possible expansion at Heathrow has been delayed given the impacts of COVID-19, however, it is anticipated that permission through a DCO or smaller scale expansion plans based on a two-runway scenario will be pursued by Heathrow at such a point that post-pandemic aviation recovery makes proposals viable.

12.8 Heathrow Airport is an important contributor to the local economy as 7% of Spelthorne's population works at the airport which is around 3525 people.[123] There is also a concentration of airport supporting facilities (related developments and activities), including freight forwarding services to the north of the Borough. Therefore, a future expansion at Heathrow in whatever form it takes, is likely to have several potential impacts, both direct and indirect, on Spelthorne. This could include pollution and impacts on road capacity and traffic flows especially in the north of the Borough. Although the Council has generally scaled back its collaborative work on the Heathrow expansion, it's involvement in other pieces of work, such as changes to flight paths, is still ongoing.

12.9 In the north of the Borough there are areas suffering high levels of noise from Heathrow Airport, in particular at Stanwell Moor and the northern part of Stanwell. Housing development in the most affected areas is restricted to one for one replacement only. The northern part of Stanwell Moor also has part of the public safety zone for the west end of the southern runway affecting it.

[122] https://www.spelthorne.gov.uk/article/17839/Air-quality-reports

[123] https://www.heathrow.com/content/dam/heathrow/web/common/documents/company/local-community/being-a-better-neighbour/Community-Investment-infographic-Spelthorne-2018.pdf

12.10 Spelthorne has about 43,100 dwellings[124] and a relatively high level of owner occupation with only a 12.4% social housing stock. It has a higher proportion of semi-detached and terraced properties and flats than the rest of Surrey. The mix of dwellings results in a higher prevailing density of housing than found in the rest of Surrey and more akin to that found in adjoining London Boroughs.

12.11 House prices in Spelthorne are relatively high. There are in excess of 2,802[125] people on the Spelthorne Housing Register 2021 and an on-going need for affordable housing.

12.12 Spelthorne's population is slightly older and its average household size slightly smaller than the national average. It has a relatively small ethnic minority population (12.7%), of which the largest group is Indian 4.2%)[126]. Almost 30% of households in Spelthorne are single person households yet around 40%[127] of the housing stock is three bedrooms or larger. Future extra care demand for Spelthorne has been calculated as 320 units by 2035 (2019 data)[128].

12.13 A relatively high proportion of the population is "economically active" (either in work or seeking work). The total unemployment rates from February 2020, just before COVID-19 affected the country to January 2021 have jumped significantly as illustrated in table 1.

Table 1: Unemployment Rates Feb 2020 - Jan 2021

	Spelthorne	Surrey	Great Britain	South East
Feb-20	1.7	1.2	3.0	2.1
Jan-21	5.6	4.0	6.2	5.1

12.14 A further considerable number of the Spelthorne population have businesses or are employed by the supply chain that serves Heathrow. As per Appendix 3: Update Report to Audit Committee on the Impact of Covid-19 on the Spelthorne Economy, the number of unemployed in Spelthorne has increased by 328%, see table 2[129] for worst impacted wards.

[124] Department for Levelling Up, Housing and Communities (2020) Live tables on dwelling stock (including vacants) - GOV.UK (www.gov.uk)
[125] https://www.spelthorne.gov.uk/AMR
[126] https://www.surreyi.gov.uk/2011-census/ethnicity/
[127] https://www.surreyi.gov.uk/2011-census/household-composition/
[128] https://www.surreycc.gov.uk/ data/assets/pdf_file/0014/214115/AwCS-Commissioning-Statement-for-Spelthorne-BC-April- 2019.pdf
[129] https://democracy.spelthorne.gov.uk/documents/s32894/Appendix%203%20Update%Report%20to%20Audit%20Committee%20on%20the%20Impact%20of%20Covid%2019%20on%20the%20Spelthorne%20Economy.pdf

Table 2: Ward Unemployment Rates Feb 2020 - Jan 2021

	Spelthorne	Stanwell North	Ashford North & Stanwell South	Sunbury Common	Staines	Ashford Common	Ashford Town
Feb-20	1,050	155	125	130	95	70	70
Jan-21	3,450	430	370	370	350	270	270

12.15 The Spelthorne Retail Study 2018[130] shows there is scope for further significant growth in shopping provision in the period to 2035 in Staines, particularly in non-food retailing. Staines is seen as the best location in both market demand and in accessibility terms. There is physical scope for further major expansion adjoining the Elmsleigh Centre. Without growth Staines is likely to lose an increasing proportion of retail expenditure to centres outside the Borough.

12.16 The Retail Studies[131] showed Ashford, Shepperton and Sunbury Cross were well-used by their local communities and the need to maintain their role. There is no scope for significant expansion but opportunities for improvement need to seek to maintain their role. Local parades provide convenient shopping facilities for local communities and are important.

12.17 There are some relatively small areas of deprivation based in parts of Stanwell, Staines, Ashford and Sunbury Common. This information comes from the Index of Multiple Deprivation (IMD) 2016/2019[132] which uses a bundle of issues to create a score. For these small pockets of deprivation the main issues are low income, lack of or poor employment, poor education and skills and crime and disorder. Income, education and employment are inextricably linked.

12.18 Spelthorne contains areas of national and international significance for nature conservation. Most of its major reservoirs form part of the South West London Waterbodies Special Protection Area, in recognition of their international significance as a habitat for two particular birds. Additionally the Staines Commons form a substantial Site of Special Scientific Interest (SSSI), which means they are of national importance for nature conservation as well as an important historic landscape. There are also smaller SSSIs and other areas of local nature conservation importance in the Borough.

12.19 Spelthorne sits on river gravels, which are an important mineral resource. The open areas of the Borough contain a mixture of past workings most of which have been restored to varying standards including some schemes that have created new habitats and landscapes. Most mineral extraction sites are filled with inert material.

130 https://www.spelthorne.gov.uk/media/18156/Retail-and-Town-Centre-Study-Update-2018/pdf/Retail_and_Town_Centre_Study_Update_2018.pdf?m=637372326981470000
131 https://www.spelthorne.gov.uk/media/18156/Retail-and-Town-Centre-Study-Update-2018/pdf/Retail_and_Town_Centre_Study_Update_2018.pdf?m=637372326981470000
132 https://www.surreyi.gov.uk/dataset/v81k7/index-of-multiple-deprivation-2019

Minerals and Waste disposal planning is the responsibility of the County Council and subject to a separate Local Development Framework.

12.20 Recreation is a significant land use in the Borough, including formal sporting sites such as Kempton Park racecourse, sailing on reservoirs and lakes, three golf courses and various parks and sports grounds as well as informal recreation including common land. The River Thames and its towpath define about 50% of the Borough boundary and attract people from a wider area as well as being an important environmental amenity.

12.21 Spelthorne Borough Council has declared a Climate Emergency for the Borough. We have committed to work with the local community and all other relevant partner agencies to support making the Borough carbon neutral as soon as practically possible. The Council will also need to work with the Local Government Association and leading environmental Non-Government Organisations to ensure we can learn from 'best practises' in mitigating the effects of climate change and to seek funding opportunities from various sources including central Government.

12.22 Earlier in the year Spelthorne Borough Council launched a dedicated member task group with the sole aim of tackling climate change as quickly as possible by developing a strategy and action plan. This Council intends to accelerate its efforts by introducing greener buildings, transportation, greener investments and increasing renewable energy. You can find more information at www.spelthorne.gov.uk/goinggreen.

The following sections describe different parts of the Borough.

12.23 **Staines-upon-Thames** is Spelthorne's major shopping centre with a catchment area covering the whole Borough and adjoining areas to the west and south. It is also the main commercial centre in the Borough. It benefits from Two Rivers shopping centre and the Elmsleigh Centre in addition to the High Street. The main residential area of Staines are to the east and south of the town centre.

A distinctive feature of the area north and east of Staines is the extensive areas of Common Land, notably Staines Moor and Shortwood Common. These are of historic as well as amenity and nature conservation value.

12.24 **Ashford** lies in the centre of the Borough and forms its largest residential area. Its town centre is linear in character and is surrounded by adjoining residential areas. It primarily serves local needs. Ashford has a number of commercial areas some in close proximity to housing and accessed through residential areas; the largest is at Littleton Road/Ashford Road. Ashford Hospital provides a hospital services and is also a major employer. Ashford has a shortage of open space in some locations.

12.25 **Stanwell** runs north from Ashford to the boundary with Heathrow. While it has an historic village centre in the north of the Stanwell area it was mostly developed down to the A30 in the immediate post war years. In comparison with the rest of Spelthorne, parts of Stanwell suffer from relatively high levels of social deprivation. Heathrow has a substantial impact on the northern part of Stanwell due to noise disturbance and the impact of airport related development, although stretches of open land between parts of Stanwell and the airport help to maintain a separate identity for the community.

12.26 **Stanwell Moor** is a separate village to the west of Stanwell. It is surrounded by open land and maintains a distinct identity. It lies partly under the flight path from the airport's southern runway and is severely affected by aircraft noise.

12.27 **Sunbury** lies at the eastern end of the Borough. It is split in two by the M3. Junction 1 of the motorway is at Sunbury Cross, which was developed in the 1970s to include several high rise commercial and residential buildings and a shopping centre adjacent to which a large Tesco superstore was added in the early 1990s. The Sunbury Common area north of the M3 includes the Borough's largest industrial estate at Windmill Road and another significant commercial area at Hanworth Road, both of which contain a mixture of traditional and modern premises. It also contains a major BP office and research facility. Lower Sunbury is a large residential area to the south of the M3. Parts of Sunbury have relatively higher levels of deprivation compared to the rest of the Borough. There is a particular concentration of poorer air quality around the Sunbury Cross Junction at Sunbury

12.28 **Shepperton** is a distinct settlement in the southern part of the Borough. It is primarily residential with a significant local shopping centre and a business park. Its major commercial site is Shepperton Studios, which lies in the north western part of the built up area.

12.29 Other smaller communities include Charlton Village, Laleham and Upper and Lower Halliford.

Summary of Issues

12.30 Many of the issues faced by the Borough are also common to authorities in the wider area such as high house prices, strong economy, traffic congestion, a strong desire to protect and enhance the environment and maintaining the role of town and local centres. There are also issues facing all authorities including matters relating to climate change.

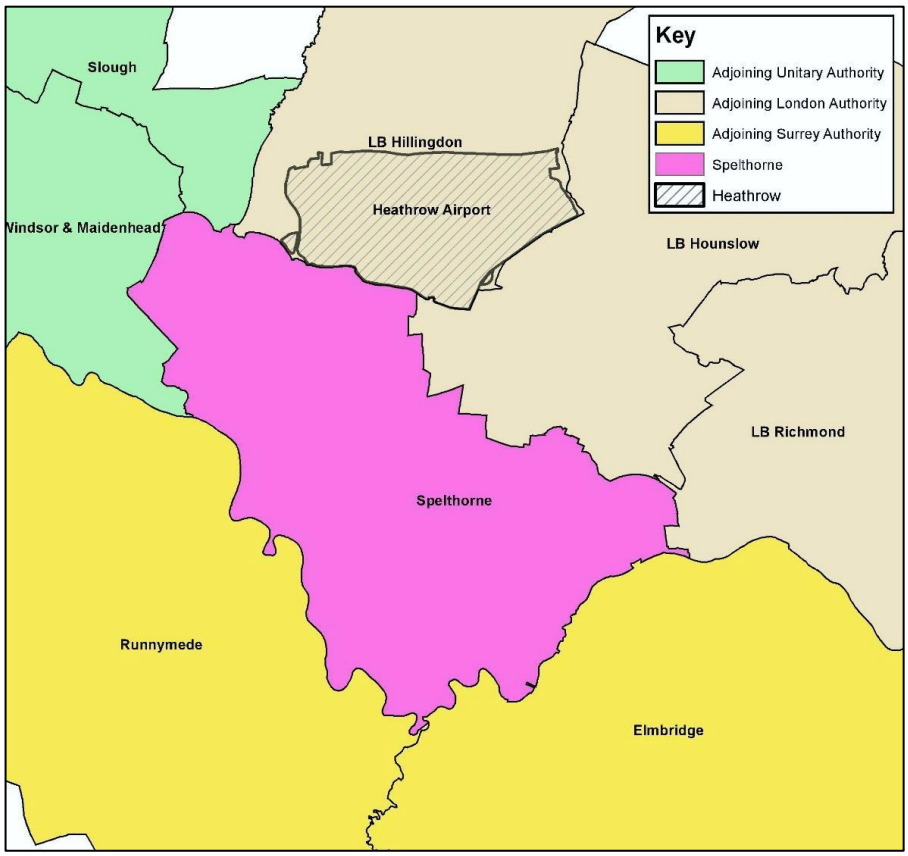
12.31 There are however in addition particular issues facing Spelthorne. These are:

- Meeting future development requirements within a limited urban area which is constrained by significant flood risks
- Reducing the extent of flood risk
- Improving air quality
- Meeting the particular need for affordable housing
- Noise from Heathrow

12.32 In addition to these major local issues there are other matters of local significance and include housing for a growing elderly population, growth in need for smaller dwellings, supporting initiatives to increase the skills of the work force, risks within the public safety zone, the environmental and visitor issues relating to the River Thames and balancing the demands for housing with other uses of land.

12.33 Some issues apply to the Borough as a whole such as affordable housing and others to particular areas e.g. flooding, air quality, focussing development on urban areas and the role of existing centres.

Spelthorne and Adjoining Authorities



Maps 4: Spelthorne and Adjoining Local Authority Areas

- Spelthorne's main towns are Ashford, Shepperton, Staines-upon-Thames, Stanwell and Sunbury-on-Thames (Sunbury Cross), with Staines being the main commercial and retail centre.
- Charlton Village, Laleham, Littleton, Lower Sunbury, Upper Halliford and Stanwell Moor comprise the Borough's villages.
- The proximity of Heathrow has a major influence on the Borough in terms of employment, housing and traffic.
- The M3 motorway is a major strategic transport route, which crosses through the southern part of the Borough with Junction 1 situated at Sunbury-on-Thames. The M25 runs north/south along the western periphery of the Borough with Junction 13 at Staines-upon-Thames.
- You can find further information about Spelthorne's statistics in the Authority Monitoring Report 2025 which is available at: www.spelthorne.gov.uk/AMR

Key Challenges

- Ensure we can allocate sufficient land to meet our housing need sustainably, including the provision of affordable homes and the needs of specific communities
- Maintain and intensify employment land, anticipating growth in the Borough, including additional growth from an expanded Heathrow Airport
- Plan for the necessary infrastructure, such as schools, roads and healthcare, to support our future population
- Protect our valuable open spaces, recreation and leisure facilities and biodiversity sites, including the River Thames and waterbodies
- Preserve the Green Belt where it is performing well against the purposes it was designated for
- Enhance the character of our towns and villages, including the vitality of our shopping areas
- Manage further risk of flooding and prevent or mitigate harm from environmental impacts such as poor air quality and noise pollution
- Ensure our Borough has the right amount of social, cultural and community facilities, including opportunities to support the arts
- Tackling Climate Emergency for the Borough. The Council's climate change emergency declaration demonstrates our commitment to addressing this major issue for society that hasn't gone away, even with the focus on COVID-19[133].

[133] https://www.spelthorne.gov.uk/article/20185/Spelthorne-declares-climate-emergency7

Appendix B: Glossary

Affordable housing: Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

a) **Affordable housing for rent:** Meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable);

(b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and

(c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).

b) **Starter homes:** is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.

c) **Discounted market sales housing:** is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.

d) Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.

Air quality management areas: Areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines.

Ancient or veteran tree: A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient, but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage.

Ancient woodland: An area that has been wooded continuously since at least 1600 AD. It includes ancient semi-natural woodland and plantations on ancient woodland sites (PAWS).

Archaeological interest: There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some

point.

Article 4 direction: A direction made under Article 4 of the Town and Country Planning (General Permitted Development) (England) Order 2015 which withdraws permitted development rights granted by that Order.

Brownfield land: See Previously developed land.

Brownfield land registers: Registers of previously developed land that local planning authorities consider to be appropriate for residential development, having regard to criteria in the Town and Country Planning (Brownfield Land Registers) Regulations 2017. Local planning authorities will be able to trigger a grant of permission in principle for residential development on suitable sites in their registers where they follow the required procedures.

Build to Rent: Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control.

Climate change adaptation: Adjustments made to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities.

Climate change mitigation: Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.

Competent person (to prepare site investigation information): A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability, and membership of a relevant professional organisation.

Conservation (for heritage policy): The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

Decentralised energy: Local renewable and local low carbon energy sources.

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

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

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

Design code: A set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The graphic and written components of the code should build upon a design vision, such as a masterplan or other design and development framework for a site or area.

Design guide: A document providing guidance on how development can be carried out in accordance with good design practice, often produced by a local authority.

Designated heritage asset: A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

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

Development plan: Is defined in section 38 of the Planning and Compulsory Purchase Act 2004, and includes adopted local plans, neighbourhood plans that have been made and published spatial development strategies, together with any regional strategy policies that remain in force. Neighbourhood plans that have been approved at referendum are also part of the development plan, unless the local planning authority decides that the neighbourhood plan should not be made.

Edge of centre: For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

Environmental impact assessment: A procedure to be followed for certain types of project to ensure that decisions are made in full knowledge of any likely significant effects on the environment.

Geodiversity: The range of rocks, minerals, fossils, soils and landforms.

Green infrastructure: A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.

Habitats site: Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites.

Heritage asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

Historic environment: All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

Housing Delivery Test: Measures net homes delivered in a local authority area against the homes required, using national statistics and local authority data. The Secretary of State will

publish the Housing Delivery Test results for each local authority in England every November.

International, national and locally designated sites of importance for biodiversity: All international sites (Special Areas of Conservation, Special Protection Areas, and Ramsar sites), national sites (Sites of Special Scientific Interest) and locally designated sites including Local Wildlife Sites.

Local Development Order: An Order made by a local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a specific development proposal or classes of development.

Local Enterprise Partnership: A body, designated by the Secretary of State for Housing, Communities and Local Government, established for the purpose of creating or improving the conditions for economic growth in an area.

Local housing need: The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 61 of this Framework).

Local Nature Partnership: A body, designated by the Secretary of State for Environment, Food and Rural Affairs, established for the purpose of protecting and improving the natural environment in an area and the benefits derived from it.

Local planning authority: The public authority whose duty it is to carry out specific planning functions for a particular area. All references to local planning authority include the district council, London Borough council, county council, Broads Authority, National Park Authority, the Mayor of London and a development corporation, to the extent appropriate to their responsibilities.

Local plan: A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. A local plan can consist of either strategic or non-strategic policies, or a combination of the two.

Main town centre uses: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Major development[134]: 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.

National trails: Long distance routes for walking, cycling and horse riding.

Natural Flood Management: managing flood and coastal erosion risk by protecting,

[134] Other than for the specific purposes of paragraphs 176 and 177 of the NPPF (2021)

restoring and emulating the natural 'regulating' function of catchments, rivers, floodplains and coasts. Other than for the specific purposes of paragraphs 176 and 177 in this Framework.

Nature Recovery Network: An expanding, increasingly connected, network of wildlife-rich habitats supporting species recovery, alongside wider benefits such as carbon capture, water quality improvements, natural flood risk management and recreation. It includes the existing network of protected sites and other wildlife rich habitats as well as and landscape or catchment scale recovery areas where there is coordinated action for species and habitats.

Neighbourhood plan: A plan prepared by a parish council or neighbourhood forum for a designated neighbourhood area. In law this is described as a neighbourhood development plan in the Planning and Compulsory Purchase Act 2004.

Non-strategic policies: Policies contained in a neighbourhood plan, or those policies in a local plan that are not strategic policies.

Older people: People over or approaching retirement age, including the active, newly-retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.

Open space: All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

Original building: A building as it existed on 1 July 1948 or, if constructed after 1 July 1948, as it was built originally.

People with disabilities: People have a disability if they have a physical or mental impairment, and that impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. These persons include, but are not limited to, people with ambulatory difficulties, blindness, learning difficulties, autism and mental health needs.

Planning condition: A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.

Planning obligation: A legal agreement entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.

Playing field: The whole of a site which encompasses at least one playing pitch as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Previously developed land: Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that

was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

Primary shopping area: Defined area where retail development is concentrated.

Priority habitats and species: Species and Habitats of Principal Importance included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006.

Ramsar sites: Wetlands of international importance, designated under the 1971 Ramsar Convention.

Renewable and low carbon energy: Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment - from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

Self-build and custom-build housing: Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act.

Significance (for heritage policy): The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.

Special Areas of Conservation: Areas defined by regulation 3 of the Conservation of Habitats and Species Regulations 2017 which have been given special protection as important conservation sites.

Special Protection Areas: Areas classified under regulation 15 of the Conservation of Habitats and Species Regulations 2017 which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds.

Site investigation information: Includes a risk assessment of land potentially affected by contamination, or ground stability and slope stability reports, as appropriate. All investigations of land potentially affected by contamination should be carried out in accordance with established procedures (such as BS10175 Investigation of Potentially Contaminated Sites - Code of Practice).

Site of Special Scientific Interest: Sites designated by Natural England under the Wildlife and Countryside Act 1981.

Spatial development strategy: A plan containing strategic policies prepared by a Mayor or a combined authority. It includes the London Plan (prepared under provisions in the Greater London Authority Act 1999) and plans prepared by combined authorities that have been given equivalent plan-making functions by an order made under the Local Democracy, Economic Development and Construction Act 2009 (as amended).

Strategic environmental assessment: A procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment.

Strategic policies: Policies and site allocations which address strategic priorities in line with the requirements of Section 19 (1B-E) of the Planning and Compulsory Purchase Act 2004.

Supplementary planning documents: Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.

Sustainable transport modes: Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, ultra low and zero emission vehicles, car sharing and public transport.

Town centre: Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.

Transport assessment: A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies measures required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport, and measures that will be needed deal with the anticipated transport impacts of the development.

Transport statement: A simplified version of a transport assessment where it is agreed the transport issues arising from development proposals are limited and a full transport assessment is not required.

Travel plan: A long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives and is regularly reviewed.

Wildlife corridor: Areas of habitat connecting wildlife populations.

Windfall sites: Sites not specifically identified in the development plan.

Policy EC3: Local Centres, Shopping Parades and Isolated Retail Units	Policy TC4: Local Shopping Centres and Parades Policy CO1: Providing Community Facilities
Policy EC4: Leisure and Culture	None
Policy E1: Green and Blue Infrastructure	EN7 - Tree Protection EN8 – Protecting and Improving the Landscape and Biodiversity
Policy E2: Biodiversity	EN7 - Tree Protection EN8 – Protecting and Improving the Landscape and Biodiversity
Policy E3: Managing Flood Risk	Policy LO1: Flooding
Policy E4: Environmental Protection	Policy EN3 (Air Quality) Policy EN11 (Development and Noise) Policy EN12 (Noise from Heathrow) Policy EN13 (Light Pollution) Policy EN15 (Development Affecting Contaminated Land)
Policy E5: Open Space and Recreation	Policy CO3: Provision of Open Space for New Development Policy EN4: Provision of Open Space and Sport and Recreation Facilities
Policy H1: Homes for All	Policy HO1: Providing for New Housing Development Policy HO4: Housing Size and Type Policy HO5: Density of Housing Development Policy HO6: Sites for Gypsies and Travellers Policy HO7: Sites for Travelling Showpeople
Policy H2: Affordable Housing	Policy HO3: Affordable Housing
Policy H3: Gypsy, Traveller & Travelling Showpeople Pitches and Plots	Policy HO6: Sites for Gypsies and Travellers Policy HO7: Sites for Travelling Showpeople
Policy ID1: Infrastructure and Delivery	Policy CO1: Providing Community Facilities Policy CO2: Provision of Infrastructure for New Development
Policy ID2: Sustainable Transport for New Developments	Policy CO2: Provision of Infrastructure for New Development Policy CC2: Sustainable Travel Policy CC3: Parking Provision

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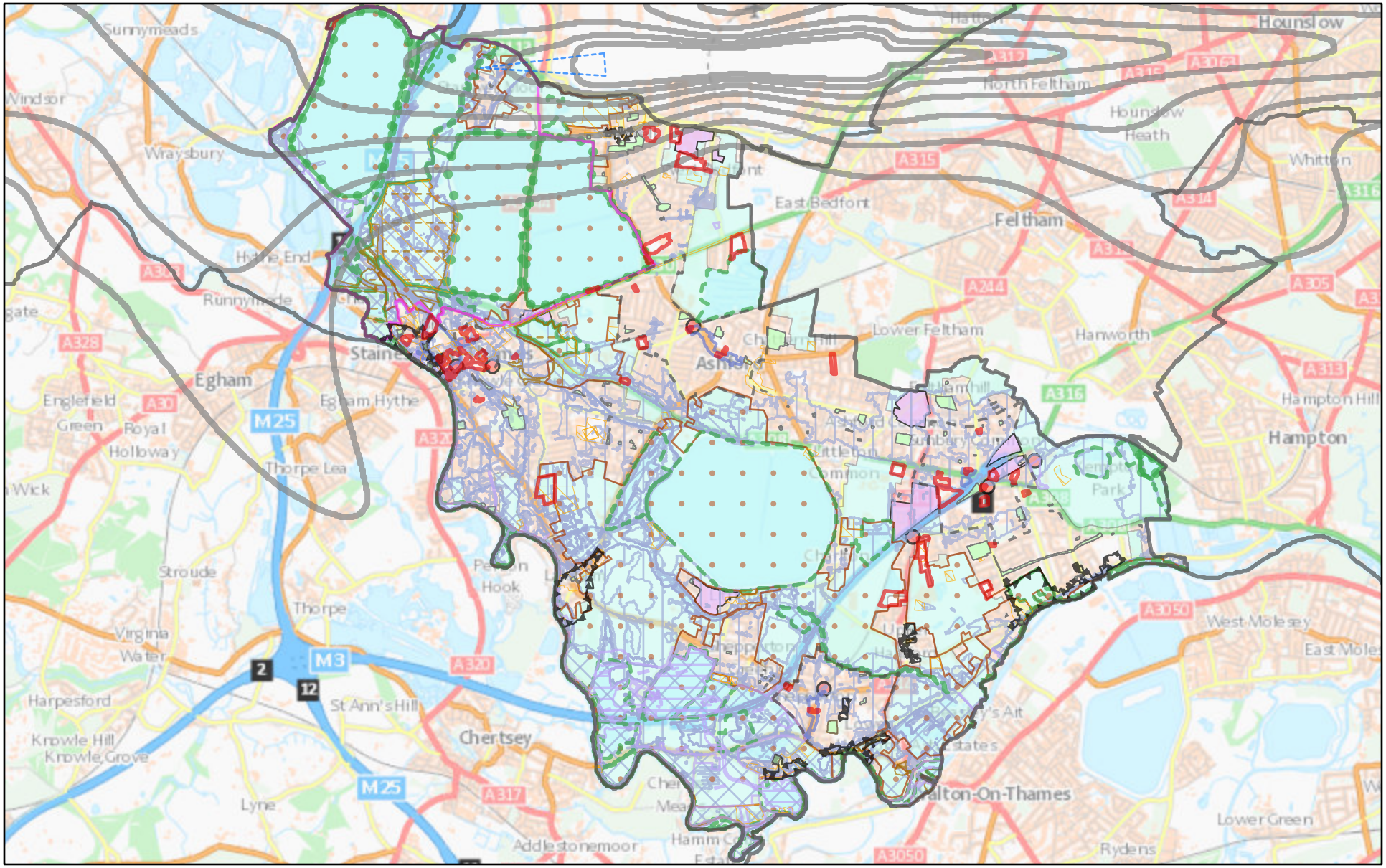
SLP Policies Map 110326



3/11/2026

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- Borough boundary
- Allocated sites
- Local Green Space
- Heathrow 2024 average summer day (standard modal split) LAeq,16h noise contours
- Staines-upon-Thames
- Ashford, Shepperton and Sunbury Cross
- Conservation Areas
- Scheduled Ancient Monuments
- Sites and Areas of High Archaeological Potential
- Sites and Monuments of County Archaeological Importance
- Primary Shopping Area
- River Thames Scheme Indicative Channel Alignment
- River Thames Scheme Areas and Land Under Consideration
- Colne Valley Park
- Common Land
- Sites of Special Scientific Interest (SSSI)
- Sites of Nature Conservation Importance (SNCIs)
- Special protection Areas (SPA) and Ramsar sites
- Biodiversity Opportunity Areas (BOA)
- Flood Zone 3b - The Functional Floodplain
- Flood Zone 3a - High Probability
- Flood Zone 2 - Medium Probability
- Local Green Space
- Strategic Employment Area
- Public Transport Station
- Green Belt
- Air Transport
- MotorwayJunction_VMD
- NamedPlace_Road_VMD_75K
- Motorway
- Primary Road
- A Road
- B Road
- Minor Road

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Spelthorne Local Plan – Schedule of Proposed Additional Modifications – May 2025

The schedule below identifies the proposed additional modifications to the Local Plan, further to the Pre-Submission (Regulation 19) version published for consultation from 15 June 2022 to 21 September 2022 (CD001) and for which Examination Hearings were held 23-25 May 2023 and 28 January to 18 February 2025. The schedule follows the order of the Local Plan, with overarching modifications set out first. Page and paragraph numbers listed below are those in the Pre-Submission (Regulation 19) Local Plan. The previous modification reference refers to the Schedule of Proposed Modifications 11 Dec 2024 (CD029) and its successive iterations (13 February, CD037 and 17 February, CD038) and is retained to enable cross-referencing. Note that in order to present only the most up to date proposed modification to the Local Plan, a number of previous modifications are merged and/or are no longer required.

Key:
AM – additional modification
~~Strike through~~ – text to be removed
Bold – new text

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Previous Modification reference
Throughout	AM01	Ensure correct paragraph, table and page numbering, formatting and typography prior to the Plan's adoption, where it is not captured by or results from the modifications set out below.	Minor editorial and typographical updates	N/A (New)
Table of Contents	AM02	Update Table of Contents	To reflect updated page numbers	AM 01 (24)
	AM03	Update Table of Contents: ~~Years 11-15 (2033-2037)~~ **Years 11-16 (2034-2039)**	To reflect time period in updated housing trajectory	N/A (New)
Introduction	AM04	Amend paragraph 1.16 as follows: The Examination[3] will be **included** a series of open public sessions which members of the public can **could** attend and observe. At the Examination, officers and expert consultants appointed by the Council will be **were** questioned by the **I**inspector on how the Local	Editorial (including tense) updates to reflect the current stage of the Plan.	N/A (New)

Section of the Plan	Proposed modification reference	Proposed Modification	Justification/ Reason for Change	Previous Modification reference
		Plan meets the tests of soundness. It is usual for developers and landowners to attend, often legally represented by barristers, to speak in favour of or oppose elements of the p**P**lan. The Council will **was** also be represented by a barrister. There are often complex legal and technical points to be made and defended.		
Site Allocations	AM05	Site allocation RL1/011 **It is noted that the site is within a Minerals Safeguarding Area (allocated in Surrey Minerals Plan 2011) and in close proximity to an operational minerals site. Appropriate mitigation will be required to protect the amenity of future occupiers from the impacts of the minerals site.**	Highlighting link to Surrey Minerals Plan 2011 Core Strategy Development Plan Document	N/A (New)
Site Allocations	AM06	HS1/009 **Development should ensure that suitable mitigation is in place so that sensitive receptors would not be adversely affected by the Charlton Lane Community Recycling Centre, Waste Transfer Station and Materials Recycling Facility.**	Highlighting link to Surrey Minerals Plan 2011 Core Strategy Development Plan Document	N/A (New)
Site Allocations	AM07	AS2/006 **Development should ensure that suitable mitigation is in place so that sensitive receptors would not be adversely affected by the Charlton Lane Community Recycling Centre, Waste Transfer Station and Materials Recycling Facility.**	Highlighting link to Surrey Minerals Plan 2011 Core Strategy Development Plan Document	N/A (New)

Spelthorne Borough Council

Sustainability Appraisal and Strategic Environmental Assessment

Post Adoption Spelthorne Local Plan 2024-2039/40 March 2026

Spelthorne Takes Shape

SPELTHORNE
BOROUGH COUNCIL

Executive Summary

This Post Adoption Statement summarises the outcomes of the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) undertaken throughout the preparation of the Spelthorne Local Plan 2024–2039/40. The SA/SEA assessed the likely social, environmental and economic effects of the Plan, considered reasonable alternatives, and identified measures to avoid, reduce or mitigate adverse effects.

The key findings are:

- The Local Plan performs positively across the majority of sustainability objectives.
- No significant adverse effects are expected from implementation of the adopted Plan.
- The removal of allocation AS1/011 resulted in beneficial outcomes for Green Belt protection.
- Updated housing supply figures and policy refinements do not alter the spatial strategy or introduce new sustainability risks.
- The Habitats Regulations Assessment (2022) concluded no adverse effects on the integrity of any Habitats Site, alone or in combination.
- Monitoring arrangements are in place to track significant environmental effects through the Authority's Annual Monitoring Report.

This summary supports public understanding of the SA/SEA process and the role it played in shaping the adopted Local Plan.

This SA/SEA Post-Adoption Statement has been prepared in accordance with Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004. It accompanies the adopted Spelthorne Local Plan 2024–2039/40 and should be read alongside the Regulation 19 SA Report (May 2022), the SA Addenda (2022–2025) and the Habitats Regulations Assessment (2022).

Document History

The Sustainability Appraisal (SA), which incorporates the requirements of the Strategic Environmental Assessment (SEA) Regulations, has been prepared iteratively alongside the development of the Spelthorne Local Plan. The following tables summarise each stage of the SA/SEA process and the documents that collectively constitute the Environmental Report for the purposes of the Environmental Assessment of Plans and Programmes Regulations 2004.

The SA incorporates the requirements of the SEA and follows the established five-stage process (Stages A–E), as set out in national plan-making guidance and toolkits used for demonstrating legal compliance.

Stage A Scoping

Date	Title	Content
March 2017	Sustainability Appraisal/Strategic Environmental Assessment Final Scoping Report	Issued for stand-alone consultation
June 2022	Sustainability Appraisal/Strategic Environmental Assessment Scoping Report Update	Updated scoping report to reflect latest position at Regulation 19 stage

Stage B/C – Developing and Refining Options & Preparing the Environmental Report

Date	Title	Content
September 2018	Sustainability Appraisal Issues & Options consultation	Issued for consultation alongside Local Plan Issues and Options Report
February 2021	Sustainability Appraisal Preferred Options consultation	Issued for consultation alongside Reg 18 Draft Local Plan Report
May 2022	Sustainability Appraisal of Draft Spelthorne Local Plan	Issued for consultation alongside the Reg 19 Pre-Submission Local Plan

Stage C/D – Publication, Consultation and Examination Updates

Date	Title	Content
May 2022	Sustainability Appraisal of Draft Spelthorne Local Plan	Issued for consultation alongside the Reg 19 Pre-Submission Local Plan
December 2022	Sustainability Appraisal Addendum Alternative Strategy	A further strategic growth option was subsequently identified, arising out of Duty to Cooperate discussions with Elmbridge Borough Council
December 2024	Sustainability Appraisal Addendum	Issued ahead of Local Plan Examination in Public Hearing sessions
April 2025	Sustainability Appraisal Addendum - April 2025	Addendum to address Main Modifications raised at Examination.
November 2025	Sustainability Appraisal Addendum – November 2025	Addendum to address Further Main Modifications raised at Examination.

Stage E – Post-Adoption Reporting and Monitoring

Date	Title	Content
March 2026	SA/SEA Post-Adoption Statement	Summarises how environmental considerations, alternatives and consultation responses were taken into account in the adopted Local Plan and sets out monitoring measures for significant environmental effects.

Together, these documents constitute the Sustainability Appraisal (SA) and the Environmental Report for the purposes of the Environmental Assessment of Plans and Programmes Regulations 2004. The iterations prepared during the Examination ensure that reasonable alternatives, environmental effects, and mitigation measures have been assessed throughout plan making, in accordance with SEA requirements.

1. Introduction

Local Plan overview

1.1 The Spelthorne Local Plan 2024–2039/40 sets out the strategic policies, development strategy and site allocations needed to guide sustainable development across the borough for the next 16 years. It identifies the scale and distribution of growth, the key locations for development, and the policy framework required to meet housing, employment, infrastructure and environmental needs. The Plan includes:

- A vision and strategic objectives for the borough;
- A development strategy providing:
  - a framework for the allocation of land for key uses such as housing, employment and community facilities;
  - the spatial context for identifying areas where development is supported or managed to protect environmental and social assets;
- Place Shaping Policies for each settlement and site specific allocation policies;
- Development Management policies that will apply to all relevant planning applications.

1.2 The Local Plan was submitted for Examination in November 2022. Initial hearings were held in May 2023, before being paused to allow further work and engagement. During this pause, Spelthorne Borough Council undertook additional technical evidence work, including refreshed assessments of housing land supply, flood risk and the Infrastructure Delivery Plan, drawing on documents published in the Local Plan evidence base.

1.3 The Hearing sessions resumed in January 2025 and concluded on 18 February 2025. Following these hearings, the Inspectors identified Main Modifications and Further Main Modifications required to make the Plan sound. These changes have been incorporated into the final adopted version of the Plan.

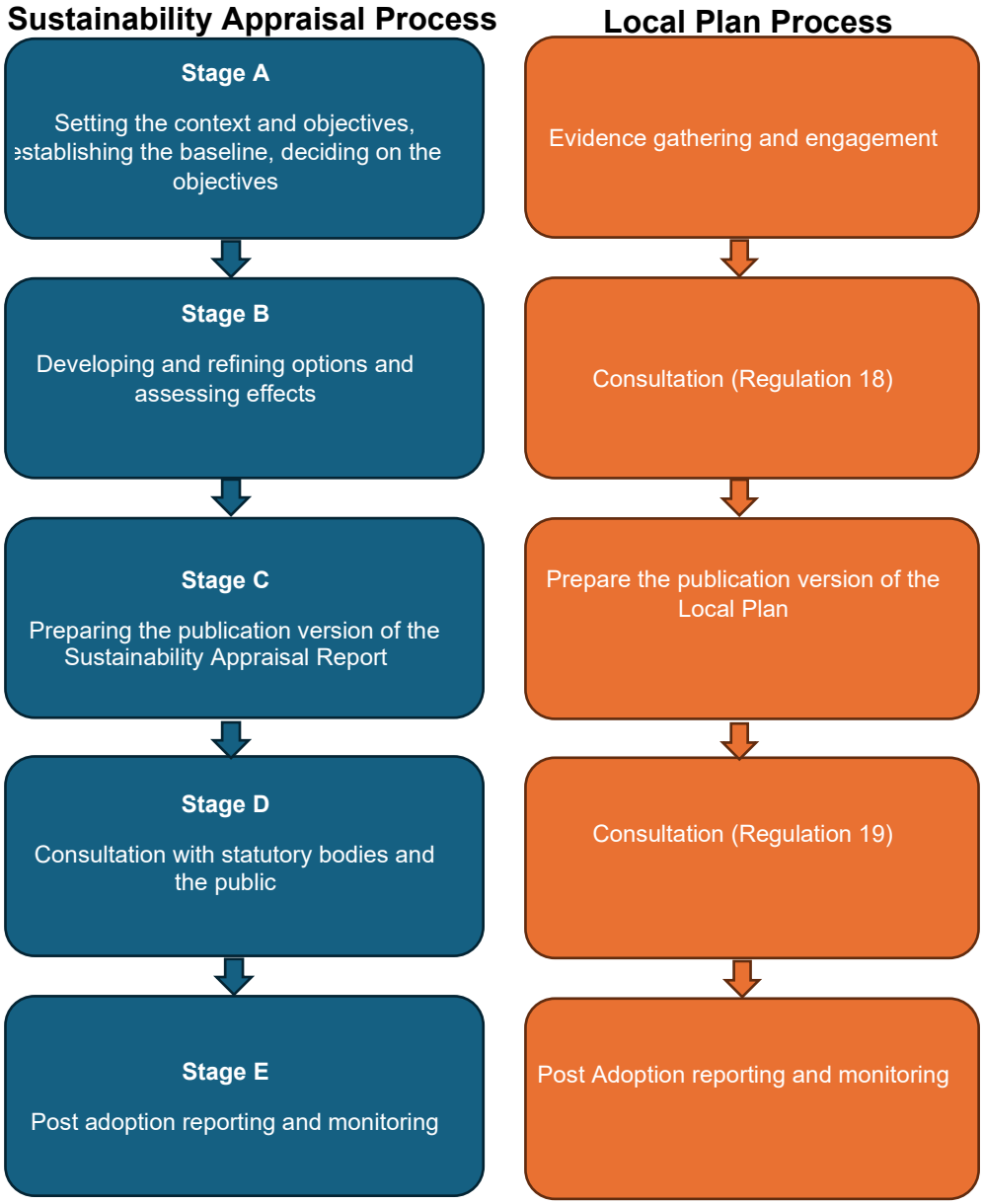
Sustainability Appraisal and Strategic Environmental Assessment Background

1.4 A Sustainability Appraisal (SA) is required under the Planning and Compulsory Purchase Act 2004 and is the mechanism through which Local Plans must meet the requirements of the SEA Regulations (Environmental Assessment of Plans and Programmes Regulations 2004). The SA therefore integrates the SEA requirements into a single process, as confirmed in the 2017 and 2022 SA/SEA Scoping Reports. Its purpose is to assess how effectively the Local Plan contributes to

sustainable development, considering economic, social and environmental factors holistically

1.5 The SA/SEA process follows a five-stage model (Stages A–E) used nationally and in line with recognised plan-making toolkits. These stages ensure that environmental considerations, reasonable alternatives, mitigation measures and monitoring arrangements are fully integrated throughout the preparation and adoption of the Local Plan.

Figure 1: Sustainability Appraisal Process



1.6 Stage A (Scoping) was undertaken in 2016–2017 and resulted in the publication of the SA/SEA Scoping Report, which established the baseline information, identified relevant plans and programmes, and set the SA objectives. This was updated in 2022 to reflect new evidence published for the Regulation 19 Local Plan, including updated assessments on housing need, Green Belt, flood risk and employment land.

1.7 Stage B (Developing and refining options) began in 2017 and included assessment of strategic growth options, site options and policy alternatives. This was summarised in the Issues & Options SA and informed the emerging strategy and preferred spatial approach. Supporting studies such as the Green Belt Assessment (Stages 1–3), Strategic Highways Assessment and Strategic Flood Risk Assessment also fed directly into the identification and refinement of options.

1.8 As the Local Plan was refined, further SA assessment supported the Regulation 18 Preferred Options (2021) and the Regulation 19 Pre-Submission Plan (2022). The Regulation 19 SA Report (May 2022) forming the core Environmental Report required under the SEA Regulations set out the detailed appraisal methodology, scoring system and alternatives assessment. Consultation with statutory bodies (Natural England, Environment Agency, Historic England) and stakeholders informed refinements at this stage.

1.9 The Regulation 19 SA Report (May 2022) was consulted on alongside the Pre-Submission Local Plan from June to September 2022. This Stage D consultation represented a key opportunity for statutory consultees and the public to consider the Environmental Report. Subsequent SA iterations in 2022, 2024 and 2025 assessed the implications of the Main Modifications and Further Main Modifications during Examination, ensuring compliance with SEA requirements for updating the Environmental Report where changes to the Plan were proposed

2. Legal Compliance

Compliance with the SEA Regulations

2.1 The Sustainability Appraisal (SA) for the Spelthorne Local Plan has been undertaken in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). These Regulations transpose the requirements of Directive 2001/42/EC (the Strategic Environmental Assessment Directive) into UK law and require that plans likely to give rise to significant environmental effects are subject to environmental assessment.

2.2 The Planning and Compulsory Purchase Act 2004 sets out that Local Plans must be accompanied by a Sustainability Appraisal, and that this SA must fulfil the requirements of the SEA Regulations. The SA for the Spelthorne Local Plan therefore integrates all SEA requirements, as confirmed in the SA Scoping Reports and subsequent appraisal documents.

2.3 Although the UK left the European Union on 31 January 2020, the SEA Regulations continue to apply as part of domestic legislation, having been retained under the European Union (Withdrawal Agreement) Act 2020. These regulations were subsequently preserved under the Retained EU Law (Revocation and Reform) Act 2023. As a result, the requirement to undertake environmental assessment of relevant plans remains fully in force.

Compliance with the Habitats Regulations (HRA)

2.4 The Local Plan has also been subject to assessment under the Conservation of Habitats and Species Regulations 2017 (as amended), commonly referred to as the Habitats Regulations. These Regulations implement the requirements of the Habitats Directive and Birds Directive and require that any plan or project that may have a likely significant effect on a Habitats Site (formerly “European site”) is subject to Habitats Regulations Assessment (HRA). Habitats Sites include Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and Ramsar sites.

2.5 As the competent authority under the Habitats Regulations, the Council must determine whether the Local Plan is likely to have a significant effect on any Habitats Site, either alone or in combination with other plans or projects. If a likely significant effect cannot be ruled out, an Appropriate Assessment must be undertaken to assess effects against the conservation objectives of the relevant site(s).

2.6 The UK’s withdrawal from the European Union has not changed the requirement to undertake HRA. The Conservation of Habitats and

Species (Amendment) (EU Exit) Regulations 2019 confirmed that the HRA process continues to apply post-exit.

HRA for the Spelthorne Local Plan

2.7 A full HRA has been undertaken for the Spelthorne Local Plan, comprising Stage 1 Screening and a Stage 2 Appropriate Assessment. These assessments are published in the Local Plan evidence base, including Habitats Regulations Assessment – Stage 1 Screening and Stage 2 Appropriate Assessment (2022)

2.8 The Appropriate Assessment considered potential effects on the following Habitats Sites:

- Southwest London Waterbodies SPA/Ramsar site – potential recreational pressure and habitat fragmentation
- Windsor Forest and Great Park SAC – potential air quality impacts
- Thames Basin Heaths SPA – potential recreational pressure
- Thursley, Ash, Pirbright and Chobham SAC – potential recreational pressure

2.9 These assessments concluded that, subject to embedded mitigation and policy safeguards, the Plan would not result in adverse effects on the integrity of any Habitats Site, either alone or in combination.

2.10 Natural England was consulted throughout the preparation of the HRA and supported the approach taken. The conclusions of the HRA were updated and reaffirmed through Examination, reflecting changes to site allocations, policy wording and infrastructure measures. All comments from Natural England were incorporated into the final HRA conclusions.

HRA and Modifications to the Plan

2.11 The Main Modifications identified through the Examination process were reviewed against the submitted HRA. As none of these modifications materially altered the quantum or distribution of development in a way that would introduce new likely significant effects, the conclusions of the Appropriate Assessment remained unchanged.

2.12 Similarly, the Further Main Modifications identified later in the Examination including the removal of the AS011 allocation (Land at Former Bulldog Nurseries) and the clarification of the Plan period did not introduce new impact pathways or increase the scale or intensity of development. The removal of AS011 reduces potential pressures on Green Belt and does not create any new HRA risks. Consequently, no supplementary HRA addendum was required, and the Council

continues to rely on the conclusions of the 2022 Appropriate Assessment.

2.13 In conclusion, the Local Plan meets all statutory requirements relating to Sustainability Appraisal, Strategic Environmental Assessment and Habitats Regulations Assessment. The SA incorporates the SEA Environmental Report, has been updated throughout Examination, and is finalised through this Post-Adoption Statement (SEA Regulation 16). The HRA concludes that the Local Plan will not have adverse effects on the integrity of any Habitats Site.

3. Methodology

3.1 Spelthorne Borough Council is legally required under the Planning and Compulsory Purchase Act 2004 to undertake a Sustainability Appraisal (SA) of the Local Plan. The SA incorporates the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations), ensuring that environmental, social and economic considerations are embedded throughout the plan-making process. This integrated SA/SEA approach is confirmed in the Council's SA Scoping Reports and aligns with national practice for Local Plans

3.2 The detailed methodology is set out in the Sustainability Appraisal of the Draft Spelthorne Local Plan (Regulation 19) (May 2022), which forms the core Environmental Report for the purposes of the SEA Regulations. This includes:

- the SA Framework (objectives, decision-aiding questions and indicators),
- the appraisal methodology and scoring system, and
- the approach to testing reasonable alternatives, including strategic growth options and site options.

The scoped SA Objectives remain applicable and are set out in Appendix A for completeness.

3.3 The SA has informed each stage of Local Plan preparation and has been published and consulted upon alongside the Plan. This systematic and iterative process ensured that sustainability considerations influenced the development strategy, site selection, policy wording and mitigation measures. Consultation with statutory bodies (Natural England, Environment Agency, Historic England) also informed methodology refinements and appraisal judgements.

3.4 The SA process has included a series of iterative documents, each building on earlier assessments and updated evidence. These include:

- The Sustainability Appraisal/Strategic Environmental Assessment Scoping Report (2017) and updated Scoping Report (2022),
- Issues & Options SA (2018),
- Preferred Options SA (2021),
- Regulation 19 SA Report (May 2022), and
- Subsequent SA prepared in 2022, 2024 and 2025 to assess Main Modifications and Further Main Modifications.

These documents reflect the evolving evidence base informing the Plan, including the Strategic Flood Risk Assessment, Green Belt Assessments, Strategic Highways Assessment, Employment Needs Assessment, Housing Trajectory, and Viability Assessment

3.5 The SA is an iterative and proportionate process. It has been used to assess reasonable alternatives, the spatial strategy, site allocations and policy options, identifying likely significant effects and proposing avoidance, mitigation and enhancement measures. This iterative assessment supported the refinement of the Plan in response to new evidence, Examination discussions, and community and statutory consultee feedback. The SA thereby ensures that the adopted Local Plan contributes positively to sustainable development and that any potential adverse effects are minimised or appropriately mitigated.

4. Purpose of this Post Adoption Statement

4.1 This document forms the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) Post Adoption Statement for the Spelthorne Local Plan 2024–2039/40. It has been prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations), which require a statement to be published upon adoption of a plan, summarising how environmental considerations and consultation responses have been taken into account. This document also finalises the overall SA process required under the Planning and Compulsory Purchase Act 2004.

4.2 The purpose of this Post Adoption Statement is to:

- confirm how the findings of the SA/SEA (including the 2017 and 2022 Scoping Reports, the Regulation 19 SA Report (May 2022), and subsequent SA Addenda) were taken into account during the preparation, Examination and adoption of the Local Plan;
- summarise how environmental, social and economic considerations shaped the final strategy, site allocations and policy wording;
- explain how the Environmental Report and consultation responses (including from Natural England, the Environment Agency and Historic England) influenced the adopted plan; and
- set out the monitoring measures that will be used to identify any significant environmental effects during plan implementation.

4.3 This Post Adoption Statement marks the completion of Stage E of the Sustainability Appraisal process, as identified in the SA process model. Stage E requires the plan-making authority to report on how the assessment has informed the adopted plan and to outline the monitoring framework. This ensures full compliance with SEA Regulation 16 and provides a clear audit trail demonstrating how environmental, social and economic effects have been considered throughout the plan-making process.

4.4 Earlier SA prepared during the Examination (December 2022, December 2024, April 2025 and November 2025) assessed the implications of Main Modifications and Further Main Modifications. These assessments informed the Inspectors' recommendations and the Council's decisions regarding policy refinement and allocation changes. The conclusions of those assessments remain valid and have informed this adoption statement.

4.5 This Post Adoption Statement therefore supersedes all previous SA and provides the final account of how sustainability considerations including reasonable alternatives, mitigation measures, evidence base

inputs (such as the Strategic Flood Risk Assessment, Green Belt Assessments, Strategic Highway Assessment and HRA) have shaped the adopted Local Plan.

5. Consideration of Main Modifications and Further Maim Modifications on Sustainability Appraisal

5.1 Throughout Examination, the Sustainability Appraisal (SA) was updated to assess the implications of the Main Modifications (April 2025) and Further Main Modifications (November 2025). These assessments were documented in the SA published as part of the Examination evidence base and were informed by the Regulation 19 SA Report (May 2022), the SA/SEA Scoping Reports (2017 and 2022), and the wider technical evidence base (including the Strategic Flood Risk Assessment, Green Belt Assessments, Strategic Highways Assessment and Housing Trajectory updates).

5.2 For the purposes of plan adoption, the Council has reviewed all Main Modifications (April 2025) incorporated into the final Local Plan to determine whether any changes give rise to new or materially different sustainability effects compared with those identified in the Regulation 19 SA Report (May 2022) and subsequent SA updates. This review has concluded that the Main Modifications largely comprise clarification, updating or consolidation of the Plan's content, including: amending the plan period to 2024–2039/40 (MM01), updating housing need figures and supply components (MM10–MM16), refining policy wording to ensure consistency with national policy across strategic, place-shaping and development management policies, and adjusting the timing or deliverability of certain site allocations where required. The Main Modifications also include the removal of a small number of sites for flood risk reasons and updated site-specific requirements for others, but these changes do not materially affect the spatial strategy or introduce new sustainability impact pathways.

5.3 All changes put forward through the Further Main Modifications are considered to have a 'not significant' implication for the Sustainability Appraisal. They relate to minor amendments to clarify the end date of the Plan Period throughout the Plan, to ST2: Planning for the Borough's housing supply figures and to allocation policies to account for the removal of site AS1/011: Land at Former Bulldog Nurseries, Town Lane.

5.4 None of these changes introduce new development sites, alter the spatial strategy, reduce mitigation embedded in policies, or increase the scale of development beyond what has previously been appraised. The modifications therefore do not give rise to new significant sustainability effects. This conclusion is consistent with findings in the April 2025 and November 2025 SA, both of which identified that the modifications would have "not significant" implications for the SA objectives.

5.5 The removal of site AS1/011 does not materially affect the achievement of the SA Framework objectives. Housing delivery remains on track through alternative allocations, permitted development sources, brownfield opportunities and windfall contributions, as demonstrated in the updated Housing Trajectory and supporting evidence. The site's removal avoids development in the Green Belt and supports SA objectives relating to land use efficiency, biodiversity, landscape character and climate resilience. No adverse impacts on flood risk, transport, air quality or infrastructure capacity arise from this change.

5.6 Other modifications, including updated housing numbers, revised site delivery timeframes and policy clarifications on sustainable transport (Policy ID2), reflect updated evidence or simplification of policy requirements rather than substantive policy change. These do not result in new or worsened sustainability effects. The appraisal conclusions reached at Regulation 19 stage and through Examination therefore remain robust.

5.7 In line with SEA requirements, the Council has considered whether any of the modifications would require revisiting the assessment of reasonable alternatives. Because the modifications do not materially alter the spatial strategy or introduce alternative site options, no further reasonable alternatives assessment is necessary at adoption.

5.8 Overall, the Council concludes that none of the modifications incorporated into the adopted Local Plan give rise to new likely significant effects that would alter the findings of the SA/SEA. As such, the SA/SEA presented through the Regulation 19 SA Report (May 2022) and subsequent SA remains valid and provides a sound basis for the adoption of the Plan.

6. Conclusion

6.1 In preparing the adopted Spelthorne Local Plan 2024–2039/40, the Council has reviewed all changes made to the Plan during Examination including the Main Modifications (April 2025) and Further Main Modifications (November 2025) to determine whether these give rise to any new or materially different sustainability effects compared to those identified in the Regulation 19 SA Report (May 2022). The earlier SA published in 2022, 2024 and 2025, concluded that the modifications did not result in significant changes to sustainability outcomes, and this conclusion remains valid for the adopted Plan.

6.2 The modifications incorporated into the adopted Local Plan do not alter the spatial strategy, introduce new development allocations, or remove sustainability safeguards embedded within Local Plan policies. Updated evidence, including the Housing Trajectory, Green Belt Assessments and Strategic Flood Risk Assessment, confirms that the Plan continues to perform positively against the SA Framework.

6.3 Overall, none of the modifications to the Local Plan give rise to new significant sustainability effects nor require further reasonable alternatives assessment. The findings of the Regulation 19 SA Report and the subsequent SA therefore remain robust. The adopted Local Plan continues to demonstrate positive sustainability performance and is expected to contribute to the social, environmental and economic wellbeing of Spelthorne over the plan period.

7. Monitoring Significant Environmental Effects

7.1 In accordance with Regulation 17 of the Environmental Assessment of Plans and Programmes Regulations 2004, the Council will monitor the significant environmental effects of implementing the Spelthorne Local Plan 2024–2039/40. The purpose of monitoring is to identify any unforeseen adverse effects at an early stage and to enable appropriate remedial action to be taken if required.

7.2 Monitoring will be undertaken through the Authority's Annual Monitoring Report (AMR) and will draw on the indicators set out in the Sustainability Appraisal Framework (Appendix A), including:

- Housing delivery and mix
- Flood risk and SuDS implementation
- Biodiversity net gain and designated site condition
- Air quality monitoring in AQMAs
- Transport indicators, including modal shift
- Carbon emissions and energy performance
- Water quality and consumption trends.

Where monitoring identifies significant negative effects, the Council will consider the need for mitigation measures, policy updates, or early plan review. This monitoring framework completes Stage E of the SA/SEA process.

Appendix A: Sustainability Appraisal Framework

Objective	Decision Aiding Questions	Indicators	NPPF Theme
1. To provide sufficient high-quality housing to enable people to live in a home suitable to their needs and which they can afford.	Will it provide housing to help meet identified needs? Will it reduce the number of unfit homes? Will it improve affordability? Will it provide specialist accommodation for elderly/disabled persons? Have a significant detrimental effect on the financial viability of delivering future housing?	Total housing completions by size, type and tenure. Number of households on the housing register. Plot requirements on the self-build register. Lower quartile property price compared against lower quartile workplace earnings.	Social – providing the supply of housing required to meet the needs of present and future generations. Economic – construction industry and building strong economy. High quality residential areas also create attractive areas for businesses to locate to. Environmental – provision of housing in suitable and sustainable locations will help to preserve the remainder of the natural environment.
2. To facilitate the improved health and well-being of the whole population and reduce inequalities.	Will it improve access to or provide healthcare and/or cultural and community facilities? Will it help to meet Accessible Natural Greenspace standards (ANGst)? Will it improve access to or provide green/blue infrastructure/ leisure/ recreation facilities? Will it improve highway safety for road users, cyclists and pedestrians? Will it contribute toward a safe & secure built environment? Will it help to address pockets of deprivations and child poverty?	Percentage of people whose health is classed as not good. Life expectancy Adult & child obesity levels. IMD Health Rankings Motorists/pedestrian/cyclists – number killed and/or seriously injured (KSI) per 100,000 population. Amount and quality of green infrastructure/recreation space by type (ha) or leisure facilities. Accessibility to Hospitals & GP Surgeries. Capacity of Health Facilities.	Social – the objective will assist in supporting strong, vibrant, inclusive, safe and healthy communities. Environmental – The facilitation of healthy and active lifestyles and open space provision will have positive impacts on the environment, resource use and enhance local green and blue infrastructure networks.

Objective	Decision Aiding Questions	Indicators	NPPF Theme
	Will it reduce recorded levels of crime and fear of crime? Will it encourage healthy lifestyles?	Accessible Natural Greenspace (ANGst) Targets. Indices of Multiple Deprivation (IMD). Number of developments implementing 'Secured by Design'.	
3. To increase resilience to, reduce the risk of, and minimising the harm from flooding	Will it reduce the number of properties at risk from all forms of flooding? Will it reduce the severity of a flood event? Will it increase the number of properties linked to sustainable drainage systems (SuDS)?	Number of properties at risk from flooding. Number of properties with flood mitigation installed. Number of properties built with SuDS installed.	Economic – CC resilient infrastructure will help to future proof businesses and make more resilient Social – maintain a healthy community/ wellbeing Environmental – protect environment/ build in resilience
4. To reduce land contamination and protect soil quality and quantity	Will it maintain the area of grade 1, 2 and 3a agricultural land? Will it remediate contaminated land and/or improve soil quality? Will it achieve efficiency in land use and avoid development of greenfield land over the redevelopment of previously developed land and buildings? Will it reduce the amount of derelict and/or underused land and/or vacant/unfit properties? Will it promote higher density development in appropriate locations?	Amount of contaminated land remediated. Area of grade 1, 2 and 3 agricultural land permanently lost to development (ha). Percentage of development built on previously developed land. Average density on sites with 10 or more dwellings (Dwellings per Ha.).	Economic – protect high quality agricultural land to protect the rural economy Environmental – protect and enhance of the natural environment

Objective	Decision Aiding Questions	Indicators	NPPF Theme
5. To reduce air and noise pollution	Will it improve air quality, in particular concentrations of NO2 and PM2.5? Will it reduce the number of properties or sites affected by poor air quality? Will it reduce the number of residential properties affected by and exposed to noise?	Annual average of NO2 and PM2.5, within AQMAs relative to national standards. The number of properties and land affected where levels of NOx or PM2.5 exceed national targets. The monitoring of LEQ noise levels around airports. Number of non-airport related noise complaints received per annum.	Social – improvements in air, noise and light pollution will support healthy communities Environmental – protect natural environment, improve biodiversity and mitigate climate change
6. To conserve and enhance biodiversity, habitats and species	Will it maintain or enhance designated sites? Will it maintain/enhance numbers of priority species or the extent and condition of priority habitats identified in Biodiversity Opportunity Areas and the Borough as a whole? Will it avoid the fragmentation of designated and priority habitats? Will it contribute towards achieving net gains in biodiversity? Will it help to deliver any identified Nature Improvement Areas? Will it protect the Borough's green/blue infrastructure and enhance connectivity?	Population of wild birds. Extent and condition of SPA/Ramsar sites. Extent and condition of Sites of Special Scientific Interest (SSSI) meeting PSA targets. Extent and condition of priority species and habitats identified in Biodiversity Opportunity Areas in Spelthorne. Number, area and condition of Sites of Nature Conservation Importance (SNCIs) and Local Nature Reserves (LNRs) within Spelthorne. Extent and condition of ancient woodlands Number of Biodiversity improvement/enhancement schemes implemented per annum.	Social – enhancement of biodiversity will support the community's health and social well-being Environmental – help to conserve and improve biodiversity

Objective	Decision Aiding Questions	Indicators	NPPF Theme
7. To conserve and enhance the historic environment, heritage assets and their settings.	Will it conserve or enhance heritage assets, the historic environment and their settings? Will it improve the quality of the historic environment? Will it provide increased access to and enjoyment of the historic environment? Will it ensure that development is well-designed and is well-related to the surrounding townscape?	Number of listed buildings, ancient monuments and conservation areas. Statutory or locally listed buildings or structures at risk. Statutory or locally listed buildings or structures demolished. Scheduled ancient monuments at risk. Number of archaeological finds. Conservation area appraisals and level at risk.	Economic – protection of historic and cultural assets will support tourism economy and create attractive areas for businesses to locate to Social – maintain a high-quality built environment
8. To protect, enhance and manage Borough's open space and landscape character.	Will it protect and enhance landscape character? Will it ensure the quality of and provision of suitable open space, where need is identified?	Quality and quantity of open space provision Areas with landscape assessment	Social – the enhancement of the natural environment will support the community's health and social wellbeing Environmental – the protection and enhancement of the natural environment Economic – character of the natural environment is a consideration within "smart growth" as they are attractive areas to locate to
9. To promote sustainable modes of travel, improve accessibility to public transport and reduce road congestion	Will it reduce the need to travel, especially by private motorised vehicles? Will it avoid contributing to congestion on the highway network?	Traffic counts Travel to work by mode Number of schools/businesses with travel plans implemented	Economic – an inadequate transport system will have significant detrimental effects on the economy therefore this will be needed to assist in building a

Objective	Decision Aiding Questions	Indicators	NPPF Theme
	Will it promote more sustainable modes of travel? Will it provide improved access to public transport services and facilities? Will it provide opportunities for integrated Transport? Will it promote travel to work/school by foot, cycle or public transport? Will it provide for disabled access to all transport options?	Number of highway/cyclist/pedestrian improvement schemes implemented	strong, responsive and competitive economy Environmental – sustainable transport will mitigate climate change and assist with the move to a low carbon economy Social – more sustainable travel options will positively impact health, wellbeing and improve quality of life.
10. Maintain high levels of employment and economic growth which is inclusive and sustainable across the Borough.	Will it support a stable labour market and contribute towards skills improvement and employment opportunities? Will it support or promote inward investment and business growth? Will it retain the most sustainably located employment sites? Will it maintain or increase the total quantity and/or quality of commercial floorspace? Will it promote mixed use development? Will it promote or enhance the viability, vitality and attractiveness of town or local centres?	IMD employment and education rankings. Working age population which are economically active. Educational attainment levels NVQ level 3 and above. The net change in the number of VAT registrations and de-registrations. Commercial floorspace levels and vacancies. Area of employment sites lost to other uses (ha). Amount of retail/commercial leisure floorspace implemented (sqm). Amount of retail/commercial leisure floorspace lost to other uses within town/local centres (sqm). Footfall numbers	Economic – contribute to building a strong, responsive and competitive economy Social – a strong economy that keeps unemployment levels low will help support strong, vibrant and healthy communities Environmental – support of innovative technologies will assist in the move to a low carbon economy and promoting the local economy will reduce the need to travel

Objective	Decision Aiding Questions	Indicators	NPPF Theme
11. To limit the impact of Climate Change and promote the efficient use of resources, to reduce greenhouse gas emissions and move to a low carbon economy.	Will it promote energy efficiency and/or renewable or low carbon technologies? Will it promote sustainable methods of construction and design? Will it promote the reuse and recycling of demolition waste? Will it reduce emissions? Reduce impact of climate change, including flooding and urban heat island effect? Will it ensure new and retrofitted development and infrastructure location and design is future proofed against the future impact of climate change?	CO2 Emissions (total and per capita). Number of commercial premises built to BREEAM 'Very good' or better. Installed renewable/low carbon energy capacity (MW/h). Amount of demolition waste reused or recycled per annum (tonnes).	Economic – contribute to building an innovative economy Social – support long term positive impacts on overall quality of life for current and future generations Environmental – mitigate climate change
12. To maintain and improve water quality and promote the efficient use of water	Will it protect and improve the quality of all water sources? Will it increase water efficiency? Will it promote greywater recycling/rainwater harvesting? Will it protect and improve hydro-geomorphology and the overall ecological status of the watercourses?	Percentage of river and groundwater units in the plan area whose biological and/or chemical quality is rated as good. Household consumption of water per day. Number of dwellings completed which exceed. Building Regulations standards for water efficiency. Commercial consumption of water per day. Number of commercial developments completed with water efficiency measures implemented.	Social – improvements in water resources and supply e.g. drinking water provision Environmental – improve biodiversity, use natural resources prudently and minimise pollution Economic – reduced water consumption will have knock on impacts on financial and less outlay, providing opportunities for spending on the local economy.

Spelthorne Borough Council

LOCAL PLAN

Habitats Regulations Assessment - Stage 1 Screening

Spelthorne Borough Council

LOCAL PLAN

Habitats Regulations Assessment - Stage 1 Screening

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WSP

Grosvenor House
2 Grosvenor Square
Southampton, Hampshire
SO15 2BE

Phone: +44 238 030 2529

Fax: +44 238 030 2001

WSP.com

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LEGISLATIVE BACKGROUND, POLICY CONTEXT AND CEJU RULINGS

APPENDIX B

HABITATS SITES DETAILS, INCLUDING QUALIFYING FEATURES AND CONSERVATION OBJECTIVES

APPENDIX C

APIS INFORMATION FOR SPA AND SAC SITES WHERE AIR POLLUTION IS LISTED AS A PRESSURE OR THREAT

1 INTRODUCTION

1.1.1. The Spelthorne Local Plan[1], which has been prepared by Spelthorne Borough Council (SBC) in consultation with the community, sets out the policies and allocations that will guide how new development and infrastructure comes forward in the Borough for the next 15 years. This emerging Local Plan will set out how the local area will develop over at least the next 15 years and, once adopted, will replace the 2009 Development Plan.

1.1.2. The Local Plan is a statutory document[2] that forms part of the Council's strategy to deliver sustainable development, tackle climate change and deliver new homes, jobs and infrastructure for current and future Spelthorne residents. Local Plans must be positively prepared, justified, effective and consistent with national policy, in accordance with Section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the National Planning Policy Framework (NPPF)[3].

1.1.3. The Local Plan sits within a wider framework of planning documents, including national guidance set out by the government in the NPPF (as referenced above), regional and county planning policies and guidance, strategic plans, supporting strategies and background studies. The Local Plan will form the basis on which planning applications will be determined within SBC's administrative area.

1.1.4. WSP has been appointed by SBC to undertake the Habitats Regulations Assessment (HRA) for the Local Plan. The focus of the HRA process is on identifying the potential for adverse effects as a result of the Local Plan policies on the integrity of European nature conservation sites (hereafter referred to as "Habitats sites").

1.1.5. Under The Conservation of Habitats and Species Regulations 2017[4] (as amended) (the 'Habitats Regulations') 'Competent Authorities' must assess plans and projects for their potential to cause Likely Significant Effects (LSE) on Habitats sites. Where the plan or project may lead to LSE it must be subject to an Appropriate Assessment to determine whether there will be adverse effects to any Habitats sites.

1.1.6. Stage 1 (Screening), as presented within this report, represents the first step in the HRA process and comprises a desk-based review of relevant information, including biodiversity information and relevant HRA reporting (relating to other relevant plans and projects).

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[1] Spelthorne Borough Council Pre-submission Spelthorne Local Plan 2022 – 2037. Available online: https://www.spelthorne.gov.uk/article/17619/Emerging-Local-Plan-2022-2037#:~:text=Full%20Council%20approved%20the%20Pre,and%20Communities%20for%20Independent%20Examination Accessed on: [06/07/22}.

[2] Section 19 of the Planning and Compulsory Purchase Act 2004 sets out specific matters to which the local planning authority must have regard when preparing a local plan. Regulations 8 and 9 of the Town and Country Planning (Local Planning) (England) Regulations 2012 prescribe the general form and content of local plans and adopted policies maps, while regulation 10 states what additional matters local planning authorities must have regard to when drafting their local plans.

[3] The National Planning Policy Framework 2021. Available online: https://www.gov.uk/government/publications/national-planning-policy-framework--2 Accessed on: [06/07/22]

[4] The Conservation of Habitats and Species Regulations 2017. Available at: http://www.legislation.gov.uk/uksi/2017/1012/contents/made (Accessed 31/03/2022)

1.1.7. This exercise identifies all relevant Habitats sites where LSE could occur and the information captured here will form the evidence base for this Stage 1 HRA (Screening) and part of any subsequent HRA stages (including if necessary, a Stage 2 Appropriate Assessment (AA) (see Methodology Section 2).

1.2 REPORT FRAMEWORK

1.2.1. This HRA screening report has been produced alongside the Sustainability Appraisal (SA) that incorporates the requirement of a Strategic Environmental Assessment (SEA) for the Local Plan and associated plans.

1.2.2. At a screening level, this report will ensure that all HRA-related considerations are fully integrated into the Local Plan documents as they develop.

1.2.3. This report details:

- the HRA process and methodology for assessment;
- the relevant Habitats sites within the Zone of Influence (ZOI) for the Local Plan policies;
- the challenges of the Local Plan policies and how these may impact upon relevant Habitats sites, and;
- the screening of LSE (Stage 1) of the Local Plan policies.

1.2.4. It should be noted that this HRA has been based solely upon the SBC Local Plan[5] and does not include a detailed analysis of any projects that may arise as a result of this Local Plan.

1.3 THE SBC LOCAL PLAN

1.3.1. The Spelthorne Corporate Plan (2021-23)[6] sets out SBC's five overarching 'CARES' priorities/objectives to focus on. By 2037 the SBC Local Plan seeks to have achieved the priorities set out within it. The 'CARES' objectives are:

"***Community**: Our communities are at the heart of everything we do, we have built strong relationships with our residents and businesses, and have forged links within those communities, so that they feel empowered, included, supported, safe and healthy.*

***Affordable housing:** We have supported the delivery of affordable and market housing which meets the needs of all sections of our communities by supporting the development of new homes of a variety of type, size and tenure.*

***Recovery**: We provided support to our business communities to help enable them to recover, be resilient to economic challenges, be dynamic and respond to the changing economic and retail climate.*

[5] Spelthorne Borough Council Pre-submission Spelthorne Local Plan 2022 – 2037. Available online: https://www.spelthorne.gov.uk/article/17619/Emerging-Local-Plan-2022-2037#:~:text=Full%20Council%20approved%20the%20Pre,and%20Communities%20for%20Independent%20Examination Accessed on: [06/07/22}.

[6] Spelthorne Borough Council Corporate Plan 2021-23. Available online: https://www.spelthorne.gov.uk/article/16732/Corporate-publications Accessed on [06/07/22]

***Environment**: We worked with our communities and partners to minimise our effects on the environment, played our part in tackling climate change and to moved further towards a clean, green and attractive Borough and protected biodiversity.*

***Service delivery**: We delivered an efficient and effective Local Plan which provides for all sections of our communities.*

1.3.2. The Local Plan[7] sets out the vision and targets for development over the Plan period, including:

"…seeking to deliver 9,270 homes, which equates to an average of 618 homes per year. This figure is Spelthorne's objectively assessed need, based on the Government Standard methodology, which is set out in the NPPF and the accompanying Planning Practice Guidance.

1.3.3. The introduction to the Local Plan also states:

"Although most of the attention is understandably focused on housing numbers, the Plan also includes important policies that reflect our local concerns and needs.

- *A robust Affordable Housing policy that will see us increase significantly the number of homes that meet the needs of our community.*
- *Actions to address the effects of climate change and protect and enhance local biodiversity.*
- *A strategy to make sure that there is infrastructure in place to support existing and future residents, with a delivery plan that sets out how this will be achieved and funded.*
- *Policies that will support economic recovery and encourage more employment into the borough.*
- *A new Staines Development Framework will help the Borough's largest town to develop and grow in as sensitive a way as possible and that takes account of its existing assets and distinctive character.*

In order to demonstrate the ability to meet the imposed housing targets, it has proved necessary to release some Green Belt land. Our Plan calls for the release of 0.7% of the existing Green Belt area."

1.3.4. The Local Plan policies which are the focus of this screening exercise are listed in Table 1-1, but for more detail refer to the primary source document[8]. A brief summary of each policy is also given in the screening Table 7-3 Section 7.

[7]/[8] Spelthorne Borough Council Pre-submission Spelthorne Local Plan 2022 – 2037. Available online: https://www.spelthorne.gov.uk/article/17619/Emerging-Local-Plan-2022-2037#:~:text=Full%20Council%20approved%20the%20Pre,and%20Communities%20for%20Independent%20Examination Accessed on: [06/07/22}

Table 1-1 – Spelthorne Local Plan policies screened in the HRA

Policy number	Title
Strategy and Strategic Policies	
ST1	Presumption in Favour of Sustainable Development
ST2	Planning for the Borough
Place Setting	
PS1	Responding to the climate emergency
PS2	Designing places and spaces
PS3	Heritage, Conservation and Landscape
Spatial Policies	
SP1	Staines-upon-Thames
SP2	Ashford, Shepperton and Sunbury Cross
SP3	Stanwell and Stanwell Moor
SP4	Local Centres, Shopping Parades and Isolated Retail Units
SP5	Colne Valley Regional Park
SP6	River Thames and its Tributaries
SP7	Heathrow Airport
Housing	
H1	Homes for all
H2	Affordable Housing
H3	Gypsy, Traveller & Travelling Showpeople Pitches and Plots
Environment	
E1	Green Belt
E2	Biodiversity
E3	Managing Flood Risk
E4	Environmental Protection
E5	Open Space and Recreation

Economy	
EC1	Meeting Employment Needs
EC2	Retail
EC3	Local Centres, Shopping Parades and Isolated Retail Units
EC4	Leisure and Culture
Infrastructure and Delivery	
ID1	Infrastructure and delivery
ID2	Sustainable Transport for New Developments

1.3.5. The Allocated development sites which are referred to primarily in Policy H1 are listed below and given graphically in Figure 1 (*sites which are mentioned specifically in the text).

Years 1-5 (2023-2027)

AS1/011 (Land at Former Bulldog Nurseries, Town Lane)*

AS2/006 (Land East of Desford Way)

AT1/002 (Land East of Ashford Sports Club, Woodthorpe Road)

AT1/012 (Ashford Community Centre, Woodthorpe Road)

AT3/007 (Ashford multi-storey car park, Church Road)

AT3/016 (23-31 (not 11-19) Woodthorpe Road)

HS1/002 (Land at Croysdale Avenue/ Hazelwood Drive)

HS1/009 (Bugle Nurseries, Upper Halliford Road)

HS1/012 (Land East of Upper Halliford, Nursery Road)

HS2/004 (Land south of Nursery Road)

LS1/024 (Land at Staines Road West and Cedar Way)

SE1/005 (Benwell House, Green Street)

SE1/024 (Annandale House, Hanworth Road)

SN1/006 (Land to west of Long Lane and south of Blackburn Trading Estate)

ST1/037 (Thameside House, South Street)

ST1/043 (Land East of 355 London Road)*

ST3/004 (Oast House, Kingston Road)

ST4/002 (Bridge Street Car Park, Hanover House & Sea Cadet Building, Bridge Street, Staines)

ST4/019 (Former Debenhams Site, High Street)

ST4/025 (Coppermill Road)*

ST4/026 (Communications House, South Street, Staines)

ST4/028 (William Hill / Vodafone/ Monsoon, High Street)

Years 6-10 (2028-2032)

AE3/006 (158-166 Feltham Road)

AS1/001 (Tesco Extra, Town Lane)*

AS1/003 (Former Staines Fire Station, Town Lane)*

HS1/012b (Land East of Upper Halliford Road)

RL1/011 (Land at Staines and Laleham Sports Club, Worple Road)

SC1/006 (Tesco Extra, Escot Road)

SE1/020 (Sunbury Adult Education Centre, The Avenue)

SE1/025 (Elmbrook House, Station Road)

SH1/010 (Shepperton Library, High Street)

ST1/028 (Leacroft Centre, Leacroft, Staines)

ST1/029 (Surrey County Council buildings, Burges Way, Staines)

ST1/030 (Fairways Day Centre, Knowle Green, Staines)

ST3/014 (Birch House/London Road, Fairfield Avenue, Staines)

ST4/004 (96-104 Church Street, Staines)

ST4/010 (Riverside car park, Thames Street, Staines)

ST4/011 (Thames Lodge Hotel, Thames Street, Staines)

ST4/023 (Two Rivers Retail Park Terrace, Mustard Mill Road, Staines)

ST4/024 (Frankie & Benny's/Travelodge, Two Rivers, Hale Street, Staines)

Years 11-15 (2033-2037)

AS2/001 (Ashford Youth Club, Kenilworth Road)*

AT3/009 (Ashford Telephone Exchange, Church Road)

SC1/013 (RMG Warehouse & Delivery Office, Staines Road West)

SC1/019 (Sunbury Social Services Centre, Vicarage Road)

SC1/021 (Land at Spelthorne Grove)

SE1/003 (Builder's Yard, Staines Road East)

SE1/008 (Telephone Exchange, Green Street)

SH1/015 (Shepperton Youth Centre, Shepperton Court Drive)

SH2/003 (Shepperton Delivery Office, High Street)

SN1/005 (Land at Northumberland Close)

SN1/012 (Stanwell Bedsits, De Havilland Way)

ST1/031 (Thameside Arts Centre, Wyatt Road)

ST2/006 (Builders Yard, Gresham Road)

ST3/012 (Staines Telephone Exchange, Fairfield Avenue)

ST4/009 (Elmsleigh Centre and Adjoining Land, South Street)

2 RELEVANT POLICY, LEGISLATION, CASE LAW AND GUIDANCE

2.1 LEGISLATIVE BACKGROUND

2.1.1. Under The Conservation of Habitats and Species Regulations 2017 (as amended) (the 'Habitats Regulations') 'Competent Authorities' must assess Plans and projects for their potential to cause LSE on Habitats sites. Where the plan or project may lead to LSE it must be subject to an AA to determine whether there will be adverse effects to any Habitats sites. Any plan or project that would lead to adverse effects on the integrity of Habitats site(s) cannot be permitted without meeting strict additional tests.

2.1.2. Defra guidance[9] states that Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) in the UK no longer form part of the EU's Natura 2000 ecological network. The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 have created a National Site Network (NSN) on land and at sea, including both the inshore and offshore marine areas in the UK. The national site network includes:

- existing SACs and SPAs; and
- new SACs and SPAs designated under these Regulations.

2.1.3. Any references to Natura 2000 in the 2017 Regulations and in guidance now refers to the new NSN.

2.1.4. It is a matter of Government policy (NPPF paragraph 118) that sites designated under the 1971 Ramsar Convention for their internationally important wetlands (commonly known as Ramsar sites) are also considered in the same way as Habitats sites. Together, these sites are referred to as 'Habitats sites' in the NPPF and in this report.

2.1.5. Other site designations of national or local importance are not assessed by the HRA process, but with respect to Sites of Special Scientific Interest (SSSI) these designations largely overlap with European or Ramsar sites.

2.1.6. Maintaining a coherent network of protected sites with overarching conservation objectives is still required in order to:

- fulfil the commitment made by government to maintain environmental protections; and
- continue to meet our international legal obligations, such as the Bern Convention, the Oslo and Paris Conventions (OSPAR), Bonn and Ramsar Conventions.

2.1.7. This report presents information to enable the screening assessment required as part of Stage 1 of the HRA process, to establish whether or not the SBC Local Plan will have a LSE upon the NSN and Habitats sites.

[9] Defra Policy Paper Changes to the Habitats Regulations 2017 **(**Published 1 January 2021). Available online: https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017 Accessed on [06/07/22]

2.1.8. The principle of Favourable Conservation Status (FCS) of features within Habitats sites as set out in the original Habitats Directive[10] is central to this assessment. The use of the term FCS is not amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 and the term still has the meaning given by Article 1 of the Habitats Directive. Defra guidance[11] does however note that

"an appropriate authority is only responsible for managing and adapting the national site network to secure FCS of a feature proportionately to the importance of the UK within the feature's natural range".

2.1.9. The Habitats Directive provides further interpretation of the meaning of 'favourable conservation status' within Article 1 parts a, e and i as below.

'(a) conservation means a series of measures required to maintain or restore the natural habitats and the populations of species of wild fauna and flora at a favourable status as defined in (e) and (i);…..

(e) conservation status of a natural habitat means the sum of the influences acting on a natural habitat and its typical species that may affect its long-term natural distribution, structure and functions as well as the long-term survival of its typical species within the territory referred to in Article 2. The conservative status of a natural habitat will be taken as "favourable" when:

- *its natural range and areas it covers within that range are stable or increasing, and*
- *the specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future, and*
- *the conservation status of its typical species is favourable as defined in (i);*

(i) conservation status of a species means the sum of the influences acting on the species concerned that may affect the long-term distribution and abundance of its populations within the territory referred to in Article 2; The conservation status will be taken as "favourable" when:

- *population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats, and*
- *the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future, and*
- *there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis'.*

[10] The Habitats Directive, European Commission. Available online: https://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm Accessed on [06/07/22]
[11] Defra Policy Paper Changes to the Habitats Regulations 2017 **(**Published 1 January 2021). Available online: https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017 Accessed [06/07/22]

2.2 STAGES OF HABITATS REGULATIONS ASSESSMENT

2.2.1. Guidance on the Habitats Directive[12] sets out the step-wise approach which should be followed to enable Competent Authorities to discharge their duties under the Habitats Directive and provides further clarity on the interpretation of Articles 6 (3) and 6 (4). As set out in Regulation 3 of The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 where Natura 2000 sites are referenced in previously issued guidance, this should be interpreted as relating to the NSN, but does not otherwise affect guidance as it applied before EU exit day.

- **Stage 1**: Screening: the process which initially identifies the likely impacts upon a NSN site of a plan or project, either alone or in combination with other plans or projects and considers whether these impacts are likely to be significant.
- **Stage 2: AA**: the detailed consideration of the impact on the integrity of the NSN sites of the plan or project, either alone or in combination with other plans or projects, with respect to the site's conservation objectives and its structure and function. This is to determine whether there will be adverse effects on the integrity of the site. Specific guidance on this stage and stage 1 is provided in Defra guidance[13].
- **Stage 3**: Assessment of Alternative Solutions: the processes that examine alternative ways of achieving the objectives of the plans or projects that avoid adverse impacts on the integrity of the NSN site.
- **Stage 4**: Assessment where no Alternative Solutions Exist and where Adverse Impacts Remain: an assessment of whether the development is necessary for Imperative Reasons of Overriding Public Interest (IROPI) and, if so, of the compensatory measures needed to maintain the overall coherence of the NSN.

2.3 RELEVANT CASE LAW

2.3.1. There are a number of recent Court of Justice of the European Union (CJEU) rulings which are relevant to this assessment and these are given for information in Appendix A.

2.3.2. As the general provisions for the protection of Habitats sites and the procedural requirements to undertake HRA to assess the implications of Plans or Projects for Habitats sites remain, this previous case law established prior to the UK's exit from the EU is considered to apply unless superseded by the judgement of an appropriate UK court.

[12] European Commission (2000). Managing Natura 2000 Sites, the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC. Available online: http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/provision_of_art6_en.pdf. Accessed [12/04/2022]

[13] Defra Guidance: Habitats regulations assessments: protecting a Habitats site. How a competent authority must decide if a plan or project proposal that affects a Habitats site can go ahead. Feb 2021. Available online: https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site Accessed [06/07/22]

2.4 NATIONAL PLANNING POLICY

NATIONAL PLANNING POLICY FRAMEWORK

2.4.1. In relation to biodiversity and the SBC Local Plan, the following paragraphs in the document are relevant:

- Paragraph 170, which states 'Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

d) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate; and

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans'.

- Paragraph 171 which states:

'Plans should distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.'

2.5 RELEVANT GUIDANCE

NATURAL ENGLAND'S INTERNAL GUIDANCE

2.5.1. In June 2018, Natural England published guidance[14] on their approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations. The document draws upon Annex F of the DMRB (now withdrawn) but takes into account the Wealden Judgement and need to assess 'in-combination' effects on Habitats sites as a result of air pollution.

[14] Natural England (June 2018) Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations. Available online: http://publications.naturalengland.org.uk/publication/4720542048845824 Accessed [31/03/2022]

2.5.2. The guidance provides a framework around the assessment of road traffic emissions and subsequent effects on Habitats sites. Notably:

- Step 1 – Does the proposal give rise to emissions which are likely to reach a Habitats site;
- Step 2 – Are there qualifying features within 200m of a road sensitive to air pollution;
- Step 3 – Could the sensitive qualifying features of the site be exposed to emissions; and
- Step 4 – Application of the Screening Thresholds.
  - Step 4a: apply the threshold alone;
  - Step 4b: apply the threshold in-combination with emissions from other road traffic plans and projects; and
  - Step 4c: apply the threshold in-combination with emissions from other non-road plans and projects.
- Step 5: Advise on the need for Appropriate Assessment where thresholds are exceeded, either alone or in-combination.

2.5.3. The relevant thresholds in relation to Step 4 are as follows:

- Changes in AADT of 1000 vehicles a day (or more); and/or
- Changes of 1% of the relevant Critical Load and/or Level as a result of the Plan/Project.

IAQM'S GUIDE TO THE ASSESSMENT OF AIR QUALITY IMPACTS ON DESIGNATED NATURE CONSERVATION SITES

2.5.4. The Guide to the Assessment of Air Quality Impacts on Designated Nature Conservation Sites[15] provides advice for ecologists relating to air quality assessments (AQAs), to evaluate the effects of air pollution on habitats and species, by increasing their understanding of the information provided by air quality specialists. The Guide focusses on the AQA process and no specific detail on the subsequent stage of the overall process, i.e. the assessment of the effects that air quality impacts may have on habitats and species, is provided in this guidance.

CIEEM ADVISORY NOTE: ECOLOGICAL ASSESSMENT OF AIR QUALITY IMPACTS

2.5.5. This guidance from the Chartered Institute of Ecology and Environmental Management [16] is intended to take ecologists (and air quality specialists) through the issues that they should consider in order to make an informed judgement as to the ecological effects of changes in pollution concentrations and deposition rates. The approaches set out build on the advice and guidance from Natural England and IAQM, but focus on the ecologist role to interpret the numerical output of air quality assessments to reach evidence-based conclusions on ecological significance.

[15] Holman et al (2020). *A guide to the assessment of air quality impacts on designated nature conservation sites – v1.1* Available online: https://iaqm.co.uk/text/guidance/air-quality-impacts-on-nature-sites-2020.pdf Accessed [31/03/2022]
[16] CIEEM (January 2021) *Advisory Note: Ecological Assessment of Air Quality Impacts.* Available online: https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/#:~:text=Advisory%20Note%3A%20Ecological%20Assessment%20of%20Air%20Quality%20Impacts.,of%20changes%20in%20pollution%20concentrations%20and%20deposition%20rates Accessed [12/04/22].

OTHER RELEVANT GUIDANCE AND POLICY:

- Chapman, C. and Kite, B. (2021). Guidance on Decision-Making Thresholds for Air Pollution. JNCC Report No.696 (Main Report), JNCC, Peterborough, ISSN 0963-8091 (Note: Plan-level limitation of use is set out in this document; advice on ZoI has been applied)
- Department for Communities and Local Government (August 2006). Planning for the protection of Habitats sites: Appropriate Assessment. Guidance for Regional Spatial Strategies and Local Development Documents. Draft.
- English Nature (2006). Draft Guidance – The Assessment of Regional Spatial Strategies and Sub-regional strategies under the provisions of the Habitats Regulations
- European Commission (2000). Managing Natura 2000 Sites, the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC. Available online: http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/provision_of_art6_en.pdf. Accessed [12/04/2022]
- Scottish Natural Heritage (January 2015). Habitats Regulations Appraisal of Plans Guidance for Plan-Making Bodies In Scotland Version 3.0 originally prepared by David Tyldesley And Associates;
- Tyldesley, D. and Chapman, C. (2013). The Habitats Regulations Assessment Handbook (July 2020 Edition) UK DTA Publications Ltd.
- Convention on Wetlands of International Importance especially as Waterfowl Habitat. Ramsar (Iran), 2 February 1971. UN Treaty Series No. 14583. As amended by the Paris Protocol, 3 December 1982, and Regina Amendments, 28 May 1987.
- Joint Nature Conservation Committee (JNCC) (2016). SAC and SPA Standard Data Forms and Ramsar Information Sheets. Available online: https://jncc.gov.uk/our-work/uk-protected-area-datasets-for-download/ Accessed [12/04/2022].

HRA POLICY GUIDANCE

- Council of the European Union (1992). Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora. Available online: http://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:31992L0043. Accessed: [12/04/2022]
- Council of the European Union (2009). Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds. Available online: http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=URISERV:ev0024. Accessed: [12/04/2022]
- Department for Communities and Local Government (DCLG) (2019). National Planning Policy Framework.
- European Communities (2007). Guidance document on Article 6 (4) of the 'Habitats Directive' 92/43/EEC; Available online: http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/guidance_art6_4_en.pdf Accessed: [12/04/2022]
- Her Majesty's Stationary Office (2017). The Conservation of Habitats and Species Regulations 2017/490.

3 METHODOLOGY

3.1.1. This report presents the findings of the Screening undertaken as part of Stage 1 of the HRA process to establish whether or not the likely impacts of the SBC Local Plan could have LSE on Habitats sites.

3.1.2. This document provides this information by undertaking the following steps:

- determining whether the plan is directly connected with or necessary for the management of applicable Habitats sites;
- describing the project/plan impacts that may have the potential for significant effects upon applicable Habitats sites; and
- describing the potential pathways of impacts, both alone and in-combination with other plans and projects.

3.1.3. The precautionary principle is applied at all stages of the HRA process. In relation to screening this means that projects and plans where effects are considered likely and those where uncertainty exists as to whether effects are likely to be significant must be subject to the second stage of the HRA process, AA.

3.1.4. The first part of the review is to establish whether the SBC Local Plan should be subject to HRA.

3.1.5. The second part comprises the information gathering stage and in particular the identification of Habitats sites which will likely require consideration and on which background information is collated. This information includes the qualifying features of these sites, the conservation objectives and the sensitivities of those sites.

3.1.6. As part of the information gathering stage, consideration is given to the air quality sensitivities of these Habitats sites, specifically their qualifying features, to changes in both NO_X and NH_3 concentrations and N Dep and then consideration of these changes in relation to the Critical Level and relevant Critical Loads[17].

3.1.7. Critical Loads and Levels are metrics used for assessing the risk of air pollution impacts to sensitive vegetation and ecosystems.

3.1.8. Critical Levels are used to estimate the exposure of sensitive vegetation and ecosystems to some important airborne pollutants, below which significant harmful effects are not expected to occur. They are not habitat specific, as with Critical Loads, but have been set to cover broad vegetation types. These levels have been adopted by the European Union and the United Nations Economic Commissions for Europe (UNECE) and are used as regulatory standards and are expressed in units of $\mu g/m^3$ (micrograms per cubic metre).

[17] Critical Loads and Levels are metrics used for assessing the risk of air pollution impacts to sensitive vegetation and ecosystems.

3.1.9. In addition to the direct effect of pollutant concentrations in the air, vegetation can also be affected by the deposition of pollutants and particles onto both the ground and vegetation. Close to roads, nitrogen deposition can be of concern for sensitive ecological sites as it can result in a variety of adverse effects depending on the habitats present (e.g. interfering with photosynthesis, increasing acidification, altering species composition etc).

3.1.10. The final element of the information gathering stage is to review the availability of relevant data sets and sources which will form the evidence base of the assessment of the Local Plan policies alone and in-combination with other relevant plans and projects. Information on sources of HRA guidance are given below and the legislative and policy background including the relevant CJEU rulings, are given in Appendix A.

4 REVIEW RESULTS

4.1 IS HRA REQUIRED?

4.1.1. The review looked to specifically answer each of the questions set out in the HRA review methodology. It should be noted that the level of detail of the Local Plan only allows for an anticipated assessment of the need for HRA based on experience of similar plans and projects (see Table 4-1 below).

Table 4-1 – Is HRA required?

	Question	Response
1	Is the whole of the plan directly connected with or necessary to the management of a Habitats site for nature conservation purposes?	No
2	Is the plan a 'strategic development plan' or 'local development plan' or 'supplementary guidance' or a core path plan or a revision thereof?	Yes
3	Does the plan provide a framework for deciding applications for project consents and / or does it influence decision makers on the outcome of applications for project consents?	Yes
4	Does the plan contain a programme, or policies, or proposals which could affect one or more particular Habitats site?	Yes
5	Is the plan a general statement of policy showing only the general political will or intention of the plan-making body, and no effect on any particular Habitats site can reasonably be predicted?	No

4.1.2. When the answer to either questions (1) or (5) is 'no', but the answer to any of questions (2), (3) or (4) is 'yes', then the requirement for further HRA is identified.

4.1.3. In this case, the answers to questions (1) and (5) are both 'no', while the answers to questions (2) to (4) are all 'yes'. It is therefore confirmed based on the availability of current information that the SBC Local Plan does therefore require HRA.

5 REVIEW OF HABITATS SITES

5.1.1. The following section provides a summary of the results of the review of Habitats sites data which will form the baseline for subsequent stages of HRA.

5.2 HABITATS SITES

5.2.1. It is necessary to consider all the Habitats sites that form part of the NSN (SACs, SPAs and proposed or candidate SPAs or SACs, expanded by the NPPF to include Ramsar sites) within a broad area or zone of influence (ZoI) of the Local Plan and the specific policies therein.

5.2.2. The ZoI is defined by the potential effects arising from the project or plan and the available pathways for those effects to reach and impact the interest features of Habitats sites.

5.2.3. In order to identify all strategic corridors where potential direct, indirect and in-combination effects could reasonably be considered possible, a ZoI buffer is set up around the primary activities, or in this case Policies, which are likely to affect the qualifying features of Habitats sites.

5.2.4. SBC has provided an indicative list of site allocations to meeting the housing needs of the Borough. These have been used as the primary basis on which to set up the ZoI and assume:

- dispersal of development across the Borough as shown on supplied plans; and
- delivery of 618 dwellings per annum around the SBC boundary was applied.

5.2.5. A ZoI of 10km has therefore been applied around the allocated sites identified, the premise being that 10km represents the average trip length as noted in the National Transport Survey[18] and as included in in the Joint Nature Conservation Committee (JNCC) guidance for air quality[19].

5.2.6. Five Habitats sites, as presented in Table 5-1, lie within the potential ZoI for the SBC Local Plan, including two SPAs and three SACs located (see Figure 2 and Appendix B). One Ramsar site falls within these site designations, the South West London Waterbodies.

5.2.7. Wimbledon Common SAC is located within 10km of the SBC boundary (in its south-eastern extent), but not within 10km of any of the proposed site allocations (see Figure 2). Given its proximity this Habitats site was initially included in this screening exercise (see 7.2.19).

5.2.8. The reasons for designation of these sites and their known vulnerabilities are given in Appendix B, which has been collated from the Natura 2000 standard data forms and the Natural England Site Improvement Plans.

5.2.9. With regard to the qualifying features and information on vulnerability of the Habitats sites detailed in Appendix B, the broad conservation objectives for SACs and SPAs are to:

[18] As cited within the Air quality and emissions mitigation guidance for Sussex (2020)
[19] Chapman, C. and Kite, B. (2021). Guidance on Decision-Making Thresholds for Air Pollution. JNCC Report No.696 (Main Report), JNCC, Peterborough, ISSN 0963-8091 (Note: Plan-level limitation of use is set out in this document; advice on ZoI has been applied)

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

- *The extent and distribution of qualifying natural habitats and habitats of qualifying species.*
- *The structure and function (including typical species) of qualifying natural habitats.*
- *The structure and function of the habitats of qualifying species.*
- *The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely.*
- *The populations of qualifying species; and*
- *The distribution of qualifying species within the site.*

5.2.10. Specific conservation objectives for Ramsar sites are not currently available.

5.2.11. The Habitats sites which fall within the identified ZoI are listed in Table 5-1.

Table 5-1 – Habitat sites falling within the 10km ZoI of proposed Housings Allocations

Habitats site
South West London Water Bodies SPA and Ramsar
Thames Basin Heaths SPA
Thursley, Ash, Pirbright and Chobham SAC
Windsor Forest and Great Park SAC
Richmond Park SAC
Wimbledon Common SAC*

*Falls within 10km of the SBC boundary rather than Allocations (see 5.2.9 above)

5.3 INFORMATION RELATING POTENTIAL EFFECTS ON HABITATS SITES

5.3.1. Table 5-2 below summarises pressures and threats listed on the Site Improvement Plans (SIPs) for SPAs and SACs that will need to be considered during screening and appropriate assessment (if required) of the Local Plan.

5.3.2. Table 5-3 below gives the distances from each Allocated site to the nearest Habitats site within the 10km ZoI buffer.

Table 5-2 - Pressures and threats listed on Habitats sites SIPs[20]

Impacts highlighted as red should be given primary consideration in screening and appropriate assessment of the Local Plan policies, and those highlighted green are less likely to be considerations in screening and appropriate assessment of the LTP policies (note that abbreviations are those pressures and threats listed in the JNCC data sheet for the respective Habitats site).

Site Name	Air pollution: impact of atmospheric nitrogen deposition	Hydrological changes	Public access/ disturbance	Habitat fragmentation	Inappropriate Management	Invasive species	Changes in species distribution	Disease	Fisheries : Fish stocking	Military	Forestry and woodland management	Natural Changes to site conditions	Undergrazing	Wildfire/ arson
Thames Basin Heaths SPA	P/T	T	P/T	P	P – scrub control	P/T	T			T	P		P	P
Thursley, Ash, Pirbright and Chobham SAC[21]	P/T	T	P/T	P	P – scrub control	P/T				T	P		P	P
Richmond Park SAC	No current issues affecting the Habitats site feature(s) have been identified for this site													
South West London Waterbodies SPA and Ramsar			P/T		T – weed control	P/T	P/T		P			P/T		
Wimbledon Common SAC	P		P	T		T								
Windsor Forest and Great Park SAC	P					T		T			P/T			

Table 5-3 - Proximity of proposed site allocations to Habitats sites within 10km of SBC's administrative boundary

Site ID	Address	Settlement	Area (ha)	Distance of Habitats sites within 10km (km)[22]						Total no. Habitats sites within 10km
				South West London Water Bodies SPA and Ramsar	Thames Basin Heaths SPA	Thursley, Ash, Pirbright and Chobham SAC	Windsor Forest and Great Park SAC	Richmond Park SAC	Wimbledon Common SAC	
AE3/006	158-166, Feltham Road	Ashford	1.32	2.4			9.8			2
AS1/001	Tesco Extra, Town Lane	Ashford	3.98	0.086			8.6			2

[20] P = Pressure, T = Threat
[21] The Thames Basin Heaths SPA and Thursley, Ash, Pirbright and Chobham SAC overlap and share a SIP.
[22] Where the Habitats site lies outside of 10km from the listed site allocation, no value is shown.

Site ID	Address	Settlement	Area (ha)	Distance of Habitats sites within 10km (km)[22]						Total no. Habitats sites within 10km
				South West London Water Bodies SPA and Ramsar	Thames Basin Heaths SPA	Thursley, Ash, Pirbright and Chobham SAC	Windsor Forest and Great Park SAC	Richmond Park SAC	Wimbledon Common SAC	
AS1/003	Staines Fire Station, Town Lane	Stanwell	0.4	0.0			7.5			2
AS1/011	Land at Former Bulldog Nurseries, Town Lane	Ashford		0.05			8.6			2
AS2/001	Ashford Youth Club, Kenilworth Road	Ashford	0.25	0.05			8.6			2
AS2/005	Land west of Edward Way	Ashford	1.87	0.6			8.2			2
AS2/006	Land East of Desford Way	Ashford		0.917			8.6			2
AT1/002	Ashford Sports Club, Woodthorpe Road	Ashford	1.15	0.7	9.7	9.7	7.5			4
AT1/012	Ashford Community Centre, Woodthorpe Road	Ashford		1.17			8.5			2
AT3/007	Ashford Multi-storey car park, Church Road	Ashford	0.20	1.3			8.4			2
AT3/009	Ashford Telephone Exchange, Church Road	Ashford	0.26	1.3			8.5			2
AT3/016	23-31 (not 11-19) Woodthorpe Road	Ashford		0.92			8.5			2

Site ID	Address	Settlement	Area (ha)	Distance of Habitats sites within 10km (km)[22]						Total no. Habitats sites within 10km
				South West London Water Bodies SPA and Ramsar	Thames Basin Heaths SPA	Thursley, Ash, Pirbright and Chobham SAC	Windsor Forest and Great Park SAC	Richmond Park SAC	Wimbledon Common SAC	
HS1/002	Land at Croysdale Avenue, Croysdale Avenue	Shepperton	1.68	1.5	9.5			9.1		3
HS1/009	Bugle Nurseries, Upper Halliford Road	Shepperton		5.25						
HS1/012	Land East of Upper Halliford, Nursery Road	Shepperton	1.60	2.4	9.8			9.6		3
HS1/012 b	Land East of Upper Halliford Road	Shepperton		2.6	9.25					2
HS2/004	Land South of Nursery Road, Nursery Road	Sunbury	0.66	2.5				9.6		3
LS1/006	Land at Windmill Close, Windmill Close	Sunbury	0.92	2.6				9.6		3
LS1/024	Land at Staines Road West and Cedar Way	Sunbury		2.65				9.8		2
RL1/007	Land off Worple Road, Worple Road	Staines	6.52	1.9	7.7	7.7	6.7			4
RL1/011	Land at Staines and Laleham Sports Club, Worple Road	Staines	6.03	2.0	7.5	7.5	6.7			4

Site ID	Address	Settlement	Area (ha)	Distance of Habitats sites within 10km (km)[22]						Total no. Habitats sites within 10km
				South West London Water Bodies SPA and Ramsar	Thames Basin Heaths SPA	Thursley, Ash, Pirbright and Chobham SAC	Windsor Forest and Great Park SAC	Richmond Park SAC	Wimbledon Common SAC	
SC1/006	Tesco Extra, Escot Road	Sunbury		2.6				9.8		2
SC1/013	RMG Warehouse and Delivery Office, 47-79, Staines Road West	Sunbury	0.25	1.8				8.8		2
SC1/019	Sunbury Social Services Centre, Vicarage Road	Sunbury		2.8				9.8		2
SC1/021	Land at Spelthorne Grove	Sunbury		2.8				9.8		2
SE1/003	77, Staines Road East	Sunbury	0.75	1.2				8.3		2
SE1/005	Benwell House, Green Street	Sunbury		2.8				9.8		2
SE1/008	Telephone Exchange, Green Street	Sunbury	0.25	1.8				8.9		2
SE1/020	Sunbury Adult Education Centre, The Avenue	Sunbury	0.43	1.2				8.2		2
SE1/024	Annandale House, 1, Hanworth Road	Sunbury	0.97	1.5				8.5		2
SE1/025	Elmbrook House, Station Road	Sunbury		2.8				8.5		2

Site ID	Address	Settlement	Area (ha)	Distance of Habitats sites within 10km (km)[22]						Total no. Habitats sites within 10km
				South West London Water Bodies SPA and Ramsar	Thames Basin Heaths SPA	Thursley, Ash, Pirbright and Chobham SAC	Windsor Forest and Great Park SAC	Richmond Park SAC	Wimbledon Common SAC	
Shepperton	Shepperton Library, High Street	Shepperton		3.3		9.12				2
SH1/015	Shepperton Youth Centre, Laleham Road	Shepperton	0.31	3.6	8.1	8.9				3
SH2/003	Shepperton Delivery Office, 47, High Street	Shepperton	0.17	3.3	7.8	9.0				3
SN1/005	Land at Northumberland Close, Northumberland Close	Stanwell	1.75	0.9			8.0			2
SN1/006	Land to the west of Long Lane and South of Blackburn Trading Estate, Long Lane	Stanwell	4.83	0.8			8.0			2
SN1/012	Stanwell Bedsits, De Havilland Way	Stanwell	2.19	0.6			7.7			2
ST1/028	Leacroft Centre, Leacroft	Staines	0.15	0.6	8.7	8.7	6.1			4
ST1/029	Surrey CC Buildings, Burges Way	Staines	0.47	1.2	8.0	8.0	6.0			4
ST1/030	Fairways Day Centre, Knowle Green	Staines	0.66	1.1	8.1	8.1	5.9			4

Site ID	Address	Settlement	Area (ha)	Distance of Habitats sites within 10km (km)[22]						Total no. Habitats sites within 10km
				South West London Water Bodies SPA and Ramsar	Thames Basin Heaths SPA	Thursley, Ash, Pirbright and Chobham SAC	Windsor Forest and Great Park SAC	Richmond Park SAC	Wimbledon Common SAC	
ST1/031	Thameside Arts Centre, Wyatt Road	Staines	0.26	1.2	8.0	8.0	5.7			4
ST1/037	Thameside House, South Street	Staines	0.24	1.0	8.0	8.0	5.3			4
ST1/043	Land East of 355 London Road	Staines		0.05		10.0	6.9			3
ST2/006	Builders Yard, Gresham Road	Staines	1.36	0.8	8.1	8.1	5.5			4
ST3/004	34-36 (OAST House) /Car park, Kingston Road	Staines	0.92	0.6	8.3	8.3	5.6			4
ST3/012	Staines Telephone Exchange, Fairfield Avenue	Staines	0.59	0.4	8.4	8.4	5.4			4
ST3/014	Birch House/London Road, Fairfield Avenue, Staines	Staines		0.53		8.5	5.56			3
ST4/002	Car Park, Hanover House and Sea Cadet Building, Bridge Street	Staines	0.92	0.8	7.8	7.8	4.8			4
ST4/004	96-104, Church Street	Staines	0.88	0.7	7.8	7.8	4.7			4
ST4/009	The Elmsleigh Centre and	Staines	6.34	0.7	7.9	7.9	5.2			4

Site ID	Address	Settlement	Area (ha)	Distance of Habitats sites within 10km (km)[22]						Total no. Habitats sites within 10km
				South West London Water Bodies SPA and Ramsar	Thames Basin Heaths SPA	Thursley, Ash, Pirbright and Chobham SAC	Windsor Forest and Great Park SAC	Richmond Park SAC	Wimbledon Common SAC	
	adjoining land, South Street									
ST4/010	Riverside Surface Carpark, Thames Street	Staines	0.25	0.9	7.9	7.9	5.2			4
ST4/011	Thames Lodge, Thames Street	Staines	0.36	1.0	7.9	7.9	5.2			4
ST4/019	Debenhams site, 35-45, High Street	Staines	0.26	0.8	7.9	7.9	5.2			4
ST4/023	Two Rivers Retail Park Terrace, Mustard Mill Road, Staines	Staines		0.6		8.5	5.56			3
ST4/024	Frankie and Benny's/Travelodge, Two Rivers, Hale Street, Staines	Staines		0.6		8.5	5.56			3
ST4/025	Coppermill Road	Staines	0.92	0.08			4.78			2
ST4/026	Communications House, South Street, Staines	Staines		0.6			5.6			2
ST4/028	William Hill / Vodafone/ Monsoon, High Street	Staines		0.6			5.6			2

6 APPROACH TO STAGE 1 SCREENING

6.1 GUIDANCE

6.1.1. Government guidance, and Court rulings, has confirmed that the level of detail in the HRA of a plan, whilst meeting the relevant requirements of the Habitats Regulations, should be appropriate to the level (or tier) of plan or project that it addresses.

6.1.2. The guidance referred to in Section 2.5 has been referred to in undertaking the Stage 1 screening of the SBC Local Plan policies. The approaches set out by the guidance have been interpreted to the level of detail available within the objectives, policies and description of projects based on the descriptions contained within the Local Plan, noting that the Plan is a high-level document. At a greater level of detail, and as normally required with specific project level HRAs for example, the HRA stages have more specific data requirements.

6.1.3. A pre-screening advisory exercise was undertaken for SBC in 2020 and relevant findings from this are included in the HRA screening.

6.2 AIR QUALITY INPUT

6.2.1. The sensitivity of Habitats sites to changes in air quality is fundamental to the Stage 1 screening of the SBC Local Plan policies. The sensitivity of the identified Habitats sites has been informed by the review of identified pressures and threats (Table 5-2) and a review of the Air Pollution Information Service (APIS)[23].

6.2.2. In many locations across the UK, the Critical Load for N deposition is exceeded due to high background concentrations (reflecting that there are a variety of sources contributing to total N deposition including agriculture which in many locations represents the dominant source). This results in such Habitat sites being particularly sensitive to changes in air quality, including those that may arise due to forecast growth on the local road network, as there is no available 'headroom' before which adverse impacts may arise.

6.2.3. Where suitable traffic data is available, Stage 1 Screening would typically comprise a review of the traffic data and application of the identified Screening thresholds[24], both 'alone' and 'in-combination'. Reference has been given to a further threshold of 50 AADT 'alone' which is the threshold that has been previously agreed with Natural England for other Local Plan projects below which effects are considered to be nugatory.

6.2.4. Where possible, the change in traffic in the vicinity of the identified Habitats sites has been determined using traffic flow information from Surrey County Council's (SCC's) Sub Regional Transport Model. However, the extent of the model does not cover all roads within the vicinity of the

[23] Air Pollution Information Service. Available at Air Pollution Information System | Air Pollution Information System (apis.ac.uk)
[24] As contained within the guidance documents produced by Natural England (July 2018) and the IAQM (May 2020).

identified Habitat Sites and as such, the following information was also taken into account when determining the likelihood of LSE:

- The proximity of the proposed site allocations to the nearest Habitat site/s;
- The likely trip generation per allocation;
- Average journey length within SBC's administrative area;
- The proportion of traffic travelling varying distances (and therefore proportionally how much traffic is likely to be travelling within the vicinity of the identified Habitats Sites); and
- The distance of the Habitats site to the nearest road likely to be affected.

6.3 IN-COMBINATION ASSESSMENT

6.3.1. It is a requirement of the Habitats Regulations to consider the effects of projects or plans "in combination" at the screening stage. Articles 24, 63 and 105 of the Habitats Regulations require Natural England and other competent authorities to consider the effects of plans or projects alone and in combination with other plans or projects. The 'in-combination' requirement is undertaken in order to make sure that prior to their authorisation the effects of numerous proposals, which alone would not result in a significant effect, are further assessed to determine whether their combined effect would be significant enough to require more detailed assessment.

6.3.2. The landmark Waddenzee judgment provides a clear interpretation of the legislation. Paragraphs 53 and 54 of the Judgment state:

6.3.3. *"according to the wording of that provision [Article 6(3) of the Habitats Directive] an appropriate assessment of the implications for the site concerned of the plan or project must precede its approval and take into account the cumulative effects which result from the combination of the plan or project with other plans or projects in view of the sites conservation objectives. Such an assessment therefore implies that all the aspects of the plan or project which can, individually or in combination with other plans or projects, affect those objectives must be identified in the light of the best scientific knowledge in the field. ....."*

6.3.4. Table 6-1 outlines the types of plans and projects that should be considered in an in-combination assessment:

Table 6-1 - Types of plans and projects considered at "In-combination" assessment

▪ The incomplete or non-implemented parts of plans or projects that have already commenced;
▪ Plans or projects given consent or given effect but not yet started;
▪ Plans or projects currently subject to an application for consent or proposed to be given effect;
▪ Projects that are the subject of an outstanding appeal;
▪ Ongoing plans or projects that are the subject of regular review;

- The incomplete or non-implemented parts of plans or projects that have already commenced;
- Any draft plans being prepared by any public body;
- Any proposed plans or projects published for consultation prior to application;
- Projects being proposed or being undertaken by a competent authority itself which require no external autorisation.

6.3.5. With reference to Section 2.2, case law and methodology relating to HRA has changed rapidly over recent years. One of the most notable changes as a result of CJEU rulings has been the clarification that mitigation measures cannot be included in HRA Stage 1 (Screening). As this was previously a common practice, many HRAs will have concluded no LSE on Habitats sites, based on the likely effectiveness of mitigation measures. The outcome of this is that preceding plan-level HRAs can be unreliable in terms of adopted conclusions of 'no LSE'.

6.3.6. Based on this complexity and need for consistency in the assumptions relating to mitigation, a precautionary approach has been adopted when considering the HRA conclusions of overlapping plans and projects in-combination.

7 HRA STAGE 1 SCREENING OF THE LOCAL PLAN POLICIES

7.1.1. The pressures and threats set out in Table 5-2 have been reviewed for those likely to arise from the policies within the local Plan and in particular the proposed delivery of dwellings within the Borough. Those considered relevant to this type and scale of development include:

- air pollution: impact of atmospheric nitrogen deposition;
- public access/ disturbance/ recreational pressures; and
- tall buildings (in relation to habitat fragmentation).

7.1.2. The pressures and threats set out in Table 5-2 which are considered at this early stage to be unlikely to arise from the draft development allocation scenario (except where this directly results secondarily from the pressures and threats included above) and are not considered further in this screening exercise, are: hydrological changes; habitat fragmentation; inappropriate management; invasive species; changes in species distribution; disease; fisheries: fish stocking; military; forestry and woodland management; natural changes to site conditions; under grazing; wildfire/ arson (as separate to public access/ disturbance).

7.1.3. Further information relating to those pressures and threats identified as relevant to the SBC Local Plan and the development allocation targets, including the Local Plan Preferred Options consultation with Natural England are also presented below.

7.1.4. The proximity of Heathrow Airport to the Borough and the potential of adverse affects on Habitats sites has been addressed through the National Policy Statement HRA[25] and a summary of the finding of this assessment are also given below in the context of the supporting policy of the SBC Local Plan SP7.

7.2 POTENTIAL AIR QUALITY EFFECTS

7.2.1. Consideration has been given to the potential effect of changes in air quality within the identified Habitats sites, where they fall within the specified ZOI, with a particular focus on qualifying features, including:

- changes in nitrogen oxide (NO_X) and ammonia (NH_3) concentrations in relation to the Critical Levels for these pollutants; and
- Changes in nitrogen (N) deposition in relation to the relevant Critical Loads.

7.2.2. As per Table 5.2, air pollution is an identified pressure for Windsor Forest and Great Park SAC and an identified pressure and threat for Thames Basin Heaths SPA and Thursley, Ash, Pirbright and Chobham SAC. Air pollution is not considered to present either a pressure or threat to Richmond Park SAC or South West London Waterbodies SPA and Ramsar.

[25] Airports National Policy Statement - Habitats Regulations Assessment - Statement to inform Appropriate Assessment June 2018. Available from: https://www.heathrow.com/company/about-heathrow/expansion/documents [Accessed online 26/07/22]

CRITICAL LEVELS FOR NO_X AND NH_3

7.2.3. The relevant Critical Levels for NOx and NH_3 relating to the protection of vegetation and ecosystems are summarised in Table 7-1.

Table 7-1 - Relevant NO_x and NH_3 Critical Levels for the Protection of Vegetation and Ecosystems

Pollutant		Concentration ($\mu g / m^3$)	Averaging Period
Nitrogen oxides (NOx)		30	Annual Mean
		75	24-hours
Ammonia (NH_3)	Lower Plants	1	Annual Mean
	Higher Plants	2 – 4 (3)	Annual Mean

CRITICAL LOADS

7.2.4. In addition to the direct effect of pollutant concentrations in the air, vegetation can also be affected by the deposition of pollutants and particles onto both the ground and vegetation. Close to roads, nitrogen deposition can be of concern for sensitive ecological sites as it can result in a variety of adverse effects depending on the habitats present (e.g. interfering with photosynthesis, increasing acidification, altering species composition etc).

7.2.5. When considering the effects of nitrogen deposition from the air onto habitats and vegetation, the relevant assessment benchmarks are known as 'Critical Loads'. Critical Loads are defined as:

"…a quantitative estimate of exposure to one or more pollutants below which significant harmful effects on specified sensitive elements of the environment do not occur according to present knowledge".

7.2.6. In the UK, Critical Loads have been established for a wide range of habitat and vegetation types, reflecting the variation in ecosystem responses. Details of the Critical Loads relevant to a specific habitat or designated site are available from the Air Pollution Information Systems (APIS) website[26]. In relation to Critical Loads, N Dep is expressed in units of kilograms of nitrogen per hectare per year (Kg N/ha/yr).

7.2.7. A summary of the relevant Critical Loads for the identified Habitats sites is provided in Appendix C for both SPAs and SACs.

[26] http://www.apis.ac.uk/

BASELINE CONDITIONS AT SITES WHERE AIR POLLUTION IS IDENTIFIED AS A PRESSURE AND/OR THREAT

7.2.8. The below information has been taken from the pre-screening advisory exercise that was undertaken for SBC in 2020. No updates to the data have been completed for the purpose of this HRA Screening as the data/values are unlikely to have altered significantly/enough to change the overall conclusions of the baseline data review.

NO_X Concentrations

7.2.9. Background annual mean NO_x values for 2020 for the identified Habitats sites (where air pollution has been identified as a pressure and/or threat) have been taken from the national maps provided by the Department for Environment Food and Rural Affairs (Defra)[27], where background concentrations of NO_x have been mapped at a grid resolution of 1x1km for the whole of the UK, and are provided in Appendix E.

7.2.10. The estimated background concentrations obtained from Defra's webpages for 2020 indicate existing exceedances of the Critical Level for annual mean NO_X concentrations (of 30µg/m^3) at background locations within the vicinity of Thursley, Ash, Pirbright and Chobham SAC.

7.2.11. The Critical Level is predicted to be met at all other Habitats sites (i.e. Wimbledon Common SAC, Windsor Forest and Great Park SAC, Thursley, Ash, Pirbright and Chobham Common SAC and Thames Basin Heaths SPA). Notwithstanding this, it should be noted that background concentrations are representative of concentrations that can be experienced away from a pollution source. Therefore, within increasing distance towards a pollution source, such a busy road, annual mean NOx concentrations will increase such that there could be the potential for exceedances of the Critical Level for this pollutant at all Habitats sites at locations near to the road edge, and the use of background annual mean NOx concentrations in the screening process should be treated with caution.

NH_3 Concentrations

7.2.12. From an initial review of the data provided in Appendix C, baseline concentrations of annual mean NH_3 are already above the relevant Critical Levels at the following Habitats sites:

- Thursley, Ash, Pirbright and Chobham SAC where the maximum value indicates the potential for exceedances of the Critical Level for Lower Plant Assemblages of 1µg/m^3 (albeit it the average value is below the relevant CL value); and
- Windsor Forest and Great Park SAC where the maximum, minimum and average values all indicate exceedances of the Critical Level for Lower Plant Assemblages of 1µg/m^3.

7.2.13. At the remaining Habitats sites, the relevant Critical Level for annual mean NH_3 concentrations is being met. Notwithstanding this, the potential for effects due to increased NH_3 as a result of the

[27] https://laqm.defra.gov.uk/review-and-assessment/tools/background-maps.html

emerging LP cannot be discounted, particularly taking into account that background concentrations of NH_3 are forecast to increase year on year[28].

N Deposition

7.2.14. In relation to the maximum N Dep values presented in Appendix C, these show that there are some locations within the identified Habitats sites[29] where the Critical Loads are already being exceeded (based on the Lower Critical Load range, applying precautionary principle). This includes locations within the following designated sites:

- Thursley, Ash, Pirbright and Chobham SAC;
- Windsor Forest and Great Park SAC; and
- Thames Basin Heaths SPA.

7.2.15. This is not to say that all these areas will be significantly impacted by SBC's emerging LP but it does highlight areas that will be particularly sensitive to any changes in air quality as a result of SBC's emerging LP.

PUBLIC ACCESS / DISTURBANCE

7.2.16. As part of the screening exercise, consideration has also been given to the sensitivities of the Habitats sites to public access and disturbance. Development in proximity to these sites can lead to an increase in visits to the sites, with the result that additional pressures can arise including increased incidence of fire, disturbance to roosting, feeding and breeding birds, trampling and increased predation rates in heathland environments[30].

7.2.17. The Habitats sites identified in this screening include those designated for habitats, specifically heathland and woodland, those designated for heathland or wetland bird species, and sites designated for invertebrate interest. The habitats or qualifying features of the Habitats sites are therefore vulnerable to additional pressures from public access or disturbance through different mechanisms.

7.2.18. The location of the identified Habitats sites in South East England places them in a location of acute pressure from high population density and predicted growth, with the corresponding identified trend to visit these sites more[31].

TALL BUILDINGS

7.2.19. Tall buildings are not specifically listed as a pressure or threat on the identified Habitats sites and specifically their qualifying features, but are considered in relation habitat fragmentation. This is an issue identified by Natural England (see section 7.2.19 below) which has potential for impact pathways on the qualifying features of the South West London Waterbodies SPA/Ramsar site. Close

[28] https://data.jncc.gov.uk/data/04f4896c-7391-47c3-ba02-8278925a99c5/JNCC-Report-665-FINAL-WEB.pdf
[29] i.e. that fall within the identified ZoI.
[30] Underhill-Day, 2005 *A literature review of urban effects on lowland heaths and their wildlife* English Nature Report 623
[31] Lake, S.; Liley, D.; Saunders, P. 2020 *Recreation use of the New Forest SAC/SPA/Ramsar: Impacts of recreation and potential mitigation approaches*. Unpublished report by Footprint Ecology

proximity of such development could lead to disturbance of qualifying wintering bird species during development construction and operation and potentially limit the movement of birds between Habitats sites and functionally linked land or supporting habitats.

PREFERRED OPTIONS CONSULTATION WITH NATURAL ENGLAND

7.2.20. Consultation responses were received from Natural England on the Local Plan – Issues and Options[32] and on the Local Plan Preferred Options – Policies and Site Allocations Plan[33] and in a further meeting on 21 June 2022.

7.2.21. Natural England has provided written commentary over the consultation process in formal letter to the Issues and Options consultation, 22 June 2018[34] and through online comments made on 21 Jan 2020 to the Preferred Options Consultation: Policies and Site Allocations: Spelthorne[35]

7.2.22. The 2018 commentary identifies primarily issues potentially associated with air quality. The 2020 commentary focusses on tall buildings and 'very close proximity' as well as 'functionally linked land', but also references air quality and recreational disturbance.

7.2.23. In the meeting held on 21 June 2022, agreement was reached on the Habitats sites and pressures/threats scoped in to this assessment. clarification was sought on what 'very close proximity' means in relation to tall building close to the South West London Waterbodies SPA/Ramsar site. The SSSI impact zones, at 50m, 200m and 500m provide a sound baseline for this assessment, but the SSSI Zone criteria do not mention tall buildings. It was generally agreed that a 200m ZoI would be utilised as a screening distance, neatly matching the SSSI Zone criteria, but NE would require this buffer to be increased where functionally linked land or a lack of existing barriers are present. It was also agreed that the 200m buffer could be disregarded where it is well within existing elevated urban development areas, or where the embanked sides of a waterbody would effectively reduce the impact of taller buildings.

7.2.24. In summary the following guidance was provided:

- Air quality - the impacts of air quality on the natural environment are expected to be addressed. In particular, the traffic impacts associated with new development. In most instances the potential for LSE can be discounted based on the likely change in traffic due to the Local Plan 'alone'. However, further evidence/traffic data information is required in relation to Windsor Forest and Great Park SAC (see Table 7-2 below).

[32] Natural England Consultation response on Issues and Options. Available from: https://spelthorne.inconsult.uk/gf2.ti/af/925666/161439/PDF/-/Natural%20England%20-%20Chris%20Baines.pdf [Accessed online 25/07/22]
[33] Natural England Consultation response on Preferred Options - policies and site allocations. Available from: https://spelthorne.inconsult.uk/DraftLocalPlan/listRepresentations?docid=11065172&objectoruid=25806657 [Accessed online 25/07/22]
[34] Chris Baines, 22 June 2018. Available from: https://spelthorne.inconsult.uk/gf2.ti/af/925666/161439/PDF/-/Natural%20England%20-%20Chris%20Baines.pdf [Accessed online 25/07/22]
[35] Victoria Huth, online comments made on 21 Jan 2020. Available from: View Comment - Spelthorne Local Plan - Preferred Options Consultation: Policies and Site Allocations - Spelthorne (inconsult.uk) [Accessed online 25/07/22]

- Tall buildings – 4 storeys or higher up to 200m from the sites is a concern, but this distance may be extended by open habitat. The distance to proposed multi-storey development is considered more acceptable if the water body has an elevated reservoir bund.
- Recreation disturbance for the SBC Local Plan is a concern on South West London Waterbodies SPA/Ramsar sites only. No SANG expected, but need to review uses and supporting habitats, e.g. margins.
- Water/nutrient neutrality – not expected to be an issue in the SBC Local Plan.

7.2.25. It was also agreed that Wimbledon Common SAC and Richmond Park SAC were outside the zone of influence (ZoI) of SBC's Local Plan proposals, and/or did not support qualifying features considered likely to be affected by the SBC Local Plan.

PROXIMITY TO HEATHROW AIRPORT

7.2.26. Policy SP7 sets out to ensure that any future significant development at Heathrow Airport (specifically the London Heathrow North West Runways (LHR-NWR) expansion) leads to the best possible outcomes for the Borough and is therefore largely a positive one. SBC supports expansion proposals, but the responsibility to ensure the environmental impact of such does not detrimentally affect the Habitats sites within the Borough and surrounds lies with Heathrow Airport Ltd.

7.2.27. In 2018 the UK Parliament voted to approve the Airports National Policy Statement on which an HRA was undertaken. The HRA concluded that it had been necessary to apply the precautionary principle where uncertainty remains. The precautionary approach suggests that AA at this strategic level cannot rule out the potential for adverse effects on the integrity of any of the Habitats sites identified through impacts on water resources and quality, habitat and species loss and fragmentation, disturbance (noise, light, visual) and air quality.

7.2.28. To address the uncertainties inherent in a strategic level HRA, and to most helpfully inform the project level HRA, the AA proposed a suite of avoidance and mitigation measures to be considered in further detail as part of the project level HRA. At that stage, it is considered that the effective implementation of the proposed suite of avoidance and mitigation measures may help to address the identified adverse effects on Habitats sites integrity.

7.2.29. However only an assessment at the project stage supported by detailed data at project level will allow it to be determined whether the development of LHR-NWR could be undertaken without adversely affecting the integrity of Habitats sites considered, including the South West London Waterbodies SPA/Ramsar site. Only at the project level HRA, with site specific supporting survey data, can a conclusion of no adverse effect on Habitats sites integrity be made with any confidence.

SUMMARY OF DISCUSSION ON PRESSURES AND THREATS

7.2.30. The screening exercise has considered the high-level pressures and threats to each site associated with public access and disturbance based on published research and reports for individual sites and the effects of access generally on habitats and species.

Table 7-2 - Discussion of Identified Pressures and Threats

Pressure/threat	Habitats sites concerned	Discussion
Air pollution: impact of atmospheric nitrogen deposition	Thames Basin Heaths SPA	All allocated sites over 7km from Habitats site. The SIP states: *"Nitrogen deposition exceeds the site-relevant critical load for ecosystem protection. The aerial pollution may be promoting changes in species composition of mires towards Molinia and sedge dominated systems rather than Sphagnum dominated; spread of Molinia into wet and dry heath also appears to be promoted by high nitrate levels. This is most likely to be a current issue at Chobham Common but may represent a chronic adverse impact over the complex as a whole".* Notwithstanding the above, at its nearest point, Thames Basin Heaths SPA is 7.5km from the nearest site allocation. The average distance travelled within SBC's administrative area is 5.5km (i.e. lower than the 10km average trip length typically applied based on the NTS). Traffic data from SCCs sub regional transport model indicates that the change in traffic on the M3 motorway due to the Local Plan 'alone' is small in relation to the overall in-combination change (the Local Plan is predicted to contribute just 2% of the overall change between 2014 and 2037 'with the Local Plan'). Furthermore, this Habitats Site is also subject to a range of other influences including physical damage to vegetation by recreational pressures and, in the area of interest, the land is managed in order to maintain a fire break either side of the M3 motorway. Taking all of the above into account, during consultation discussions with Natural England (21st June), it was agreed that further assessment of air pollution effects on Thames Basin Heaths SPA was not required.
	Thursley, Ash, Pirbright and Chobham SAC	All proposed site allocations are over 4.7km from the Habitats site. Whilst this still falls within the identified ZoI, it does suggest that a reasonable degree of distribution of traffic over the local network is likely to have occurred between the proposed site allocation and Habitats site. As Thames Basin Heaths SPA and Thursley, Ash, Pirbright and Chobham share a SIP, the extract (as outlined for Thames Basin Heaths SPA above) is equally applicable/relevant to Thursley, Ash, Pirbright and Chobham SAC.

Pressure/threat	Habitats sites concerned	Discussion
		As per Thames Basin Heaths SPA, during consultation discussions with Natural England (21st June), it was agreed that further assessment of air pollution effects on Thursley, Ash, Pirbright and Chobham SAC was not required.
	Windsor Forest and Great Park SAC	All proposed site allocations are over 5km from the Habitats site. Whilst this still falls within the identified ZoI, it does suggest that a reasonable degree of distribution of traffic over the local network is likely to have occurred between the proposed site allocation and Habitats site. N Dep currently exceeds the site relevant Critical Loads. The SIP suggests that *likely sources include Heathrow airport which is close to Windsor Forest and Great Park SAC. Air quality is likely to be an issue for old trees, fungi and lichens*. The change in traffic on roads travelling through Windsor Forest and Great Park SAC is minimal and around the 50 AADT mark which Natural England considered to be the threshold below which effects due to the Local Plan 'alone' are considered to be nugatory. No traffic data was available for the following roads: B3022 (Winkfield Road) or A332 (Sheet Street/Kings Road). The change on the A308 (as it approaches Windsor) due to the Local Plan 'alone' is predicted to be in the region of 323 vehicles a day. Whilst this will distribute further across the network as it travels onwards towards the A332/B3022, further traffic data is being sought regarding the likely change in traffic on these roads.
Public access/ disturbance	Thames Basin Heaths	All allocated sites are over 7km from the Habitats site. Public access and disturbance are listed as both pressures and threats on the designated site and specifically the features of European nightjar, Woodlark and Dartford Warbler. The proposed measure in the Site Improvement Plan to address this is the creation of an over-arching access management strategy however it is uncertain how such measures can effectively mitigate additional visitors as nearby resident numbers increase. In subsequent consultation with Natural England, it was advised that recreational pressures can be screened out on the basis of significant distance from the Habitats site. The Site Improvement Plan identifies that parts of the SPA are already subject to high levels of

Pressure/threat	Habitats sites concerned	Discussion
		recreational use and that a significant proportion of this is dog walking, with a likely associated effect on the distribution, breeding success and overall numbers of ground nesting-birds. The Site Improvement Plan also identifies the “avoidance” measures in place, including the provision of Suitable Accessible Natural Green Space (SANGS) for surrounding areas, but additional research and habitat management are also presented as required to manage the pressures and threats from public access.
	Thursley, Ash, Pirbright and Chobham	This designated site overlaps with the Thames Basin Heaths SPA. The Site Improvement Plan predominately focuses on the effects of disturbance on the SPA bird species, however the SAC habitats provide a supporting function for those species and measures targeted at habitat creation for birds to address public pressure and coordination of habitats and pressure across the individual parts of the site complex may have a resulting effect on SAC habitats.
	South West London Waterbodies	All allocated sites within 4km from the Habitats sites, with eleven within 1km and two allocation sites immediately adjacent. Public access and disturbance are listed as both pressures and threats on the designated site and specifically the features of gadwall and shoveler. The Site Improvement Plan identifies that public access for recreation, including water-based activities on some waterbodies (the designated site is composed of a number of reservoirs, lakes and bodies of water) may disturb these species and/or reduce the habitat available to them. Measures to manage the recreational pressure on these sites, which are likely to be highly attractive to additional nearby residents, have been put forwards including creating alternative recreation opportunities, but such measures will need to be able to effectively address the scale and pace of additional development in close proximity to the designated site waterbodies to avoid adverse effects.
Tall buildings	South West London Waterbodies SPA and Ramsar site	All allocated sites within 200m from the Habitats sites should be considered in relation to the impact of tall buildings. This pressure and threat is not listed in the SIP or JNCC data sheet for this site. There are tall buildings (above 5/6 stories) already in the built up area of Staines upon Thames and Ashford, some in close proximity to this Habitats site, but mostly within the established urban areas. Six allocated sites have been identified which sit

Pressure/threat	Habitats sites concerned	Discussion
		within the 200m ZoI of this Habitats site (see Figure 2). AS1/001 Tesco site, 350 units proposed on 3.94ha, existing tall buildings are adjacent (Ashford Hospital and West Plaza residential buildings). Planning guidance suggests any new building will at similar height to existing (5-6 stories). AS1/003 Fire station site 0.4ha, 50 units proposed, could be 5/6 stories high. AS1/011 Former bulldog Nurseries site, 24 units proposed which are unlikely to be high rise, but could be 4/5 stories. AS2/002 Ashford Youth Club site 0.25ha, 5 units proposed and reinstatement of youth club building, unlikely to be high rise. ST1/043 Land east of 355 London Road, allocated as a Gypsey and Traveller site and likely to be laid out plots for mobile residential units and caravans, unlikely to result in high rise. ST4/025 Copper Mill Road 0.92ha 15 proposed Units, unlikely to result in high rise, likely to be less than 4 stories and set adjacent to existing residential area.

7.2.31. Table 7-3 sets out the findings of the Stage 1 screening exercise and identifies where the potential for LSE arises.

7.2.32. Most of the policies in the SBC Local Plan can be concluded not to pose a risk of likely significant effects following the screening exercise. These policies inherently present no pathway of effects and generally set out general development or planning protection principles, largely without specifying a quantum of growth or development schemes.

7.2.33. Two policies; ST2 – Spatial Development Framework and ID1 Infrastructure and Delivery, are screened in and as such require further consideration in this HRA at stage 2 AA. In both cases, the Policies have the potential for increased traffic (and therefore impacts on air quality), increased recreational and development pressures and therefore disturbance on nearby Habitats sites.

Table 7-3 - Screening

b	Heading	Summary of Policy	Relevant Habitats sites within refined ZOI[36]	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in?
Strategy and Strategic Policies						
ST1	*Presumption in Favour of Sustainable Development*	When determining development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF. The principle informs both the policies and site allocations contained within the Local Plan. When implementing Policy ST1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development. In accordance with policies in the NPPF that protect important natural and heritage assets, the presumption will not automatically apply to: Habitats sites (including sites	All Habitats sites	This is a positive policy that seeks to promote sustainable development. It is compatible with the aims of conserving the integrity of Habitats sites by helping to ensure the delivery of sustainable development. In addition, there is a presumption against automatically applying this Policy to Habitats sites which will require appropriate assessment (generic level) in the planning process aiming to protect all nature conservation sites including Habitats sites.	No LSE therefore no in-combination effect.	Screened out

[36] Where there is an identified pressure or threat.

		protected under the Birds and Habitats Directives) and/or designated as Sites of Special Scientific Interest (SSSIs), development requiring appropriate assessment because of its potential impact on a Habitats site, land designated as Green Belt, or Local Green Space, designated heritage assets, and or locations identified as at risk of flooding.				
ST2:	*Planning for the Borough*	**Spatial Development Strategy** National policy requires that SBC meet objectively assessed housing needs, including any unmet needs from neighbouring authorities, where it is practical to do so and consistent with achieving sustainable development. The Plan seeks to deliver 9,270 homes over the Plan period, which equates to an average of 618 homes per year. The policy also includes the provision for new permanent pitches for Gypsies and Travellers and new permanent plots for Travelling Showpeople in accordance with Gypsy and Traveller Accommodation Assessment (GTAA).	South West London Waterbodies SPA and Ramsar site Windsor Forest and Great Park	This policy provides the development principles to meet the National Housing Allocation objectives. The quantum of development across the Borough is set out in the Allocated sites identified, some of which are in close proximity to Habitats sites (Figure 2). Any development within SBC's administrative area has the potential for increased traffic (and therefore impacts on air quality), increased recreational and development pressures and therefore disturbance on nearby Habitats sites (10km buffer for recreation and air quality and 200m for tall	Any increase in traffic due to development has the potential to give rise to 'in-combination' effects with other plans and projects. Visitor pressure may be further increased as a result of additional residents and journeys delivered under Local Plan policies and development schemes.	Screened in

		The Council expects that all development will, at a scale proportionate to the proposal, make a positive contribution to achieving the relevant targets relating to climate change and Biodiversity Net Gain.		buildings). This policy could result in development in proximity to Habitats sites which could lead to LSE.		
Place Shaping						
PS1:	*Responding to the climate emergency*	The Local Plan plays a key role in addressing the climate emergency by reducing carbon dioxide emissions and supporting the transition to a zero carbon future. As well as helping to deliver improvements to flood risk, air quality, recycling and waste management. Across the Council's services, all strategic decisions, budgets and approaches to planning decisions will be aligned with the goal of achieving a shift to carbon neutrality. The Council intends to accelerate its efforts by introducing greener buildings, transportation, greener investments and increasing renewable energy. The Council will take a proactive approach to mitigating the effects of, and adapting to, climate change to ensure the future resilience of both communities and infrastructure. This includes locating new development in	All Habitats sites	A positive policy addressing the climate emergency by reducing carbon dioxide emissions and supporting the transition to a zero carbon future. Likely to be of benefit to the Habitats sites if this includes the provision of increased EV infrastructure and shifts to public transport and active travel modes.	No LSE therefore no in-combination effect.	Screened out

		locations that reduces reliance on private motor vehicles as well as being designed and constructed in a way to achieve low or zero carbon buildings and facilitates more sustainable lifestyles including supporting the ability to work flexibly				
PS2:	*Designing places and spaces*	High quality in the design and layout of new development is fundamental to achieving identified needs and creating places where people want to live and will thrive. Good design is a Article 7 is relevant to this HRA : 7) Given the size, function and proposed density of major developments, particularly those exceeding 50 dwellings, tall buildings and/or allocated sites on former Green Belt land, it may not always be desirable to reflect locally distinct patterns of development……and …… In Staines, the Development Framework will provide site specific guidance on the design of larger and tall buildings.	All Habitats sites	This is a development management policy relating to housing quality. This policy provides positive provision and is a key aspect of sustainable development. There are no effects pathways present.	No LSE therefore no in-combination effect.	Screened out
PS3:	*Heritage, Conservation and Landscape*	SBC will seek to preserve, conserve and enhance as appropriate the architectural, historic and landscape	All Habitats sites	A development management policy relating to conserving Heritage assets. There	No LSE therefore no in-combination effect.	Screened out

		character of the Borough. The Council will also expect all new development proposals to make a positive contribution to the environment taking account of any relevant design codes.		are no effects pathways present.		
Spatial Policies						
SP1:	*Staines-upon-Thames*	Staines has the opportunity to grow and develop into a thriving town that can take advantage of its close proximity to Heathrow Airport and proposed new public transport schemes are likely to enhance its connectivity further. The Staines Development Framework will deliver an ambitious and viable vision for the transformation and regeneration of the whole town. The Framework will be adopted as a Supplementary Planning Document to guide decision-making, supporting the Local Plan and this policy. Article 1 of this policy states : Recognising its size, location and significant opportunity for further regeneration, Staines-upon-Thames will be a key focus for housing, employment and retail development in the Borough. The guidance for how the town grows sustainably and coherently will be provided within a new	South West London Waterbodies SPA and Ramsar site	This policy provides the development principles for development within Staines upon Thames. This policy will be embedded in the Staines Development Framework which will set out guidance on sustainable development in this area of the Borough. The quantum of development is set out in the Allocated sites identified in the area of the town, some of which are in close proximity to Habitats sites (Figure 2). Most allocated sites are in Staines town itself which is built-up and has a number of tall buildings. These Allocated sites can be screened out on this basis and the lack of effects pathways to the nearest Habitats site and respective qualifying features (see Section 5).	No LSE therefore no in-combination effect.	Screened out

		Staines Development Framework (the Framework) to deliver development to meet need		Two Allocated sites in close proximity (200m ZoI) to the SW London Waterbodies SPA/Ramsar (Staines and King George VI Reservoirs (ST1/043) and Wraysbury Reservoir (ST4/025)) require particular note. The former (ST1/043) is an allocated Gypsy and Traveller site alongside London Road and it is anticipated will entail low rise, small mobile units or caravans. The latter (ST4/025) is allocated for 15 residential units on 0.92ha and is unlikely to comprise a high rise residential development. Both will sit at the base of the Reservoir embankments which are approximately 17m above ground level at this location. The South West London Waterbodies in the vicinity of Staines, Ashford and Stanmore have restricted access and are fenced. Recreational pressure from any proposed development in the Staines area is likely to be dispersed over a much wider area therefore and no LSE is anticipated. As air pollution has not been identified as a		

				pressure or threat at South West London Waterbodies (see Table 5-2) this policy is unlikely to result in significant effects at South West London Waterbodies. Furthermore, the focus on development within Staines, where there is existing infrastructure and services, is likely to reduce overall traffic associated with forecast growth (by reducing the need to travel and travelling by more sustainable modes of travel).		
SP2:	*Ashford, Shepperton and Sunbury Cross*	Article 1 of this policy states : Ashford, Shepperton and Sunbury Cross offer the potential for development opportunities to help meet identified needs. There are opportunities to maximise the efficient use of land by raising densities whilst ensuring high quality design, particularly around public transport interchanges, within the existing character. New developments will be expected to provide infrastructure improvements necessary to mitigate impacts.	South West London Waterbodies SPA/Ramsar site	This policy provides the principles for development within the Ashford, Shepperton and Sunbury Cross built-up areas. The quantum of development is set out in the Allocated sites identified in the area of the towns, some of which are in close proximity to Habitats sites (Figure 2). Most Allocated sites are located within already built-up areas and are some distance from Habitats sites. On this basis and the lack of effects pathways to the nearest Habitats site and	No LSE therefore no in-combination effect.	Screened out

				respective qualifying features they are screened out of this assessment (see Figure xx Section xx) Four Allocated sites (AS1/001, AS1/003, AS1/011 and AS2/001) are located near the Staines Reservoir, a part of the SW London Waterbodies SPA/Ramsar site. These are discussed in Table 7-2 above. The South West London Waterbodies in the vicinity of Staines, Ashford and Stanmore have restricted access and are fenced. Recreational pressure from any proposed development in the Staines area is likely to be dispersed over a much wider area therefore and no LSE is anticipated. As air pollution has not been identified as a pressure or threat at South West London Waterbodies (see Table 5-2) this policy is unlikely to result in significant effects at South West London Waterbodies due to changes in air quality. Furthermore, the focus on development within areas where there is existing infrastructure and		

				services, is likely to reduce overall traffic associated with forecast growth (by reducing the need to travel and travelling by more sustainable modes of travel).		
SP3:	*Stanwell and Stanwell Moor*	SBC will support the communities of Stanwell and Stanwell Moor and will seek to secure improved economic, social and environmental benefits. Stanwell and Stanwell Moor are communities to the north of the Borough which are less well connected to the rest of Spelthorne. Both Stanwell and Stanwell Moor are heavily impacted by Heathrow Airport. There is therefore a requirement for these communities to benefit from new and improved facilities and infrastructure where this can be secured.	South West London Waterbodies SPA/Ramsar site	This policy provides the principles for development within the Stanwell and Stanwell Moor built-up areas. The quantum of development is set out in the Allocated sites identified in the area of the towns (Figure 2). All Allocated sites are located within already built-up areas and are some distance from Habitats sites. On this basis and the lack of effects pathways to the nearest Habitats site and respective qualifying features they are screened out of this assessment (see Figure 2). The South West London Waterbodies in the vicinity of Staines, Ashford and Stanmore have restricted access and are fenced. Recreational pressure from any proposed development in the	No LSE therefore no in-combination effect.	Screened out

				Staines area is likely to be dispersed over a much wider area therefore and no LSE is anticipated. As air pollution has not been identified as a pressure or threat for South West London Waterbodies (see Table 5-2) this policy is unlikely to result in significant effects at South West London Waterbodies due to changes in air quality.		
SP4:	*Green Belt*	In order to uphold the fundamental aims of the Green Belt to prevent urban sprawl and to keep land within its designation permanently open, inappropriate development will not be approved unless very special circumstances can be demonstrated. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm is clearly outweighed by other considerations. Proposals within the Green Belt will also be expected to comply with all other Local Plan policies, particularly those that cover design, amenity, landscape, biodiversity and flooding.	All Habitats sites	A development management policy relating to protecting the Greenbelt. There are no effects pathways present.	No LSE therefore no in-combination effect.	Screened out

SP5:	*Colne Valley Regional Park*	The Colne Valley Regional Park covers over 10,000 hectares to the west of London. SBC supports the objectives of the Park and will seek to ensure that land within it is kept open and available for informal recreation where possible and that any proposals for development make a positive contribution to the setting of the Park, its landscape and recreational potential.	All Habitats sites	A development management policy relating to conserving the Colne Valley regional Park. There are no effects pathways present.	No LSE therefore no in-combination effect.	Screened out
SP6:	*River Thames and its Tributaries*	The River Thames is regarded as a key asset of the Borough, is one of the Borough's key tourist attractions, and the Council is keen to maximise its potential. The river brings great benefits from tourism, leisure, recreation and ecological perspectives, and is also beautiful. Section 5.27 states; Policy SP6 aims to ensure that the setting of the river and its tributaries are protected and where possible enhanced. SBC is working with the Environment Agency and other partners to bring forward the River Thames Scheme which aims of reducing flood risk in communities. The large scale of the project means it is treated as a Nationally	All Habitats sites	A development management policy relating to protecting the character of the River Thames. A key element of this Policy is the development of the River Thames Scheme in partnership with he Environment Agency and others. As an NSIP and DCO a specific HRA will be required for this Scheme. However, for the Policy itself, which is a positive one and sets out to protect the River Thames, no effects pathways have been identified.	No LSE therefore no in-combination effect.	Screened out

		Significant Infrastructure Project (NSIP) and requires a development consent order' (DCO).				
SP7:	*Heathrow Airport*	The main objective of this policy is for SBC to ensure that a future expansion at Heathrow Airport secures and provides the best possible outcomes for its residents and businesses, and in particular those most directly affected in the Stanwell Moor and Stanwell communities. SBC will support a future expansion (in principle) as it recognises the potential economic benefits and opportunities that an expanded airport could bring to Spelthorne, the wider Southeast and the UK as a whole. However, its support will be entirely dependent on Heathrow Airport Limited (HAL) making sure that the proposed scheme comprehensively and effectively mitigates the impacts it will have on communities, businesses, services and environment.	South West London Waterbodies SPA/Ramsar site	This policy sets out to ensure that any future significant development at Heathrow Airport leads to the best possible outcomes for the Borough and is therefore largely a positive one. SBC supports expansion proposals, but the responsibiity to ensure the enviromental impact of such does not detrimentally affect the Habitats sites within the Borough and surrounds lies with Heathrow Airport Ltd. This policy therefore is screened out (see Section 7.2.23).	No LSE therefore no in-combination effect.	Screened out
Housing						
H1	*Homes for All*	The policies within the Plan set out how a wide variety of high-quality homes, of all tenures,	All Habitats sites	This is a development management policy relating to equality and	No LSE therefore no in-combination effect.	Screened out

		types and sizes, which meet the needs of SBC residents will be delivered. The Council will seek to enable housing delivery which meets the needs of different groups including families, older people, younger people, people with disabilities, people requiring more specialist accommodation, the Gypsy and Traveller community and Travelling Showpeople community. The Plan will also seek to make provision for self-build/custom build projects and starter homes.		inclusivity and to meet the demand and supply of suitable homes which meet the needs of SBC residents. There are no linking effects pathways present		
H2:	*Affordable Housing*	The Council will require at least 30% affordable housing units on all schemes of 10 units (net) or more. Greenfield sites will be expected to deliver at least 50% affordable housing. The objective of this policy is therefore to provide a deliverable framework within which affordable housing can be secured from new development in the Borough.	All Habitats sites	This is a development management policy and a framework to guide the affordable housing requirement in SBC. There are no linking impact pathways present	No LSE therefore no in-combination effect.	Screened out
H3:	*Meeting the needs of Gypsy, Traveller and Travelling Showpeople*	SBC will make provision for additional Gypsy and Traveller pitches and additional plots for Travelling Showpeople to meet the accommodation needs in the Borough which are identified in the most up-to-date Gypsy and Traveller	South West London Waterbodies SPA/Ramsar site	This is a development management policy to guide SBC when providing for Gypsy and Traveller needs. It does not identify any quantum of development. However, some Allocated sites do	No LSE therefore no in-combination effect.	Screened out

		Accommodation Assessment (GTAA).		include those which are planned to accomodate Gypsies and Travellers and are in close proximity to Habitats sites, e.g. ST1/043 near the SW London Waterbodies SPA/Ramsar at Staines. The nature of the development within these sites is such that no buildings above one storey are anticipated and therefore no visual disturbance is likely for qualifying bird species.		
Environment						
E1:	*Green and Blue* [37] *Infrastructure*	All development should contribute towards the provision, improvement, and maintenance of the green infrastructure network across the Borough where appropriate to do so.	All Habitats sites	A positive policy providing for the protection and creation of Local Green and Blue infrastructure. This policy has the potential to divert recreational pressure	No LSE therefore no in-combination effect.	Screened out

[37] Green Infrastructure is defined in the NPPF as 'a network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.
Blue Infrastructure is the network of watercourses and other bodies of water including reservoirs, which provide ecological, landscape and recreational value to the Borough. This also includes the banks and corridors immediately along the watercourse which can provide significant biodiversity benefits and play a vital role in ensuring habitat connectivity

		Section 7.9 states : The Water Framework Directive43 requires rivers and waterbodies in the UK to achieve good ecological status by 2027. This includes resisting the establishment and spread of non-native invasive species which can have a significant detrimental impact on native species. UK domestic law has retained the WFD and requires that River Basin Management Plans (RBMPs) are produced to improve the status of waterbodies. Many of the waterbodies in the Borough support recreational uses which are required to be carried out within tight environmental restrictions and are regulated. Recreational uses are supported provided that they respect the ecological and landscape values of the waterbodies and the associated corridor.		away from sensitive Habitats sites.		
E2:	*Biodiversity*	Articles 1 and 2 state : 1) SBC will support development proposals which restore, maintain and enhance habitat connectivity and will seek opportunities for habitat creation particularly within Biodiversity Opportunity Areas. Development proposals will be expected to contribute to biodiversity through clearly	All Habitats sites	This is a positive policy that seeks to protect nature conservation sites including Habitats sites and embeds Biodiversity Net Gain within Planning Policy.	No LSE therefore no in-combination effect.	Screened out

		demonstrating improvements when submitting a planning application as part of securing biodiversity net-gain. 2) Development on or adjacent to the following designated sites in the Borough will need to have reference to this Policy: • Ramsar sites (International). • Special Protection Areas (European). • Sites of Special Scientific Interest and National Nature Reserves (National). And article 10 states : Development proposals not directly related to the management of Ramsar, and SPA, as well as SSSI units forming part of these designations will not be permitted unless it can be demonstrated that the impact of proposals, either alone or in combination, will not result in likely significant effects. If significant adverse effects remain even with the implementation of suitable avoidance and/or mitigation, development proposals will need to demonstrate that alternatives to the proposal have been fully explored.				

E3:	*Managing Flood Risk*	Article 2 states : To reduce the overall and local flood risk and manage water resources development must be located, designed and laid out to ensure that it is safe, the risk from flooding is minimised (whilst not increasing flooding risk elsewhere) and that residual risks are safely managed.	All Habitats sites	This is a positive policy that seeks to protect development from flood risk.	No LSE therefore no in-combination effect.	Screened out
E4:	*Environmental Protection – Air, water, noise and light*	Relevant sections state : 7.36 National policy states that planning policies and decisions should contribute to and enhance the natural and local environment by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate (NPPF 2021, paragraph 174).	All Habitats sites	This is a positive policy that is to drive significantly improved environmental conditions in the SBC area, including air and water quality.	No LSE therefore no in-combination effect.	Screened out

		7.37 Whilst some polluting activities are controlled through legislation, the planning system has a complementary role in directing the location of development that may give rise to pollution where a separate pollution control regime does not apply, both pollution directly generated from the development or indirectly, for example through the traffic a development generates. The NPPF 2021 is clear that the impact of pollution is a material planning consideration. 7.38 National policy requires planning policies and decisions to take into account the likely cumulative effects of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development (NPPF 2021, paragraph 185 and 186).				
E5:	*Open Space and Recreation*	Open Space forms the basis of the Borough's green infrastructure network supporting residents and other users. This policy seeks to protect existing provision as a minimum and ensure provision of spaces in which there are	South West London Waterbodies SPA/Ramsar site	This is a positive policy that promotes leisure activities, including walking and cycling, Such activities potentially can lead to air quality improvements through reduced reliance on motor vehicles.	No LSE therefore no in-combination effect.	Screened out

		identified deficiencies over the plan period.		Recreational facilities also have the potential to divert pressure away from Habitats sites. There is potential for new recreational/leisure facilities and infrastructure to impact on Habitats sites but no proposals or quantum of development has been put forward in this respect. Allocated site AS2/001 requires the re-location of the existing Youth Club on the same development site.		
Economy						
EC1:	*Meeting Employment Needs*	One of the roles of the planning system is to contribute to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity. The Employment Land Needs Assessment (ELNA), identified a need for a fairly small additional amount of floorspace over the plan period in order to meet the anticipated level of jobs which will be created. Meeting this will meet the identified local	All Habitats sites	This is a broad policy relating to Spelthorne's economy. Whilst it is noted that economic growth has potential to impact upon Habitats sites (atmospheric pollution and water resource conflicts), this policy does not explicitly provide for development, but provides planning guidance for decision making.	No LSE therefore no in-combination effect.	Screened out

		Spelthorne need. We are keen to gain from the economic benefits that our close proximity to Heathrow brings.				
EC2:	*Retail*	Staines-upon-Thames is the Borough's main town centre, where main town centre uses should be directed principally. Ashford, Shepperton and Sunbury Cross are district centres which act as key providers for their respective catchments. As such SBC will ensure that identified retail needs, as well as those of other main town centre uses, will be met using the centre hierarchy.	South West London Water bodies	This policy provides the principles for retail development within town centres. It does not identify any specific location or quantum of development. The policy primarily relates to already built up town centres and therefore unlikely to impact on Habitats sites. It can be considered that at the Local Plan level there are no linking impact pathways.	No LSE therefore no in-combination effect.	Screened out
EC3:	*Local Centres, Shopping Parades and Isolated Retail Units*	The local centres play an important role in supporting their communities. These centres have a few shops which help to provide for local people's basic day-to-day needs but lack the diversity of more established retailers or uses such as banking facilities, supermarkets etc The Local Plan sets out protect these centres and encourage the development of uses within Class E, particularly retail where appropriate. Parades and	All Habitats sites	This policy provides the principles for development within town centres and isolated retail units. It does not identify any specific location or quantum of development. Isolated retail units, eg convenience stores, are unlikely to impact on Habitats sites and will largely be within already built up areas. It can be considered that at the Local Plan level	No LSE therefore no in-combination effect.	Screened out

		isolated shops which are often on their own and provide an important service such as post office or local convenience store.are also the focus.		there are no linking impact pathways.		
EC4:	*Leisure and Culture*	SBC considers that the leisure and cultural experience in the Borough has the potential to contribute to Spelthorne's future growth. As such, the Council will continue to protect existing leisure and tourism facilities. Where appropriate, new facilities will also be supported to enhance the Borough's attractiveness to its residents and visitors. The provision of arts and cultural facilities in particular can broaden the Borough's offer and increase its appeal to visitors. In relation to Heathrow section 8.34 states : Spelthorne's proximity to Heathrow Airport, London and several large-scale tourist attractions means that there is potential for visitors to use facilities within the Borough, particularly in respect of hotels. This also presents the opportunity to enhance this provision to improve tourism opportunities within the Borough.	All Habitats sites	This is a positive policy that promotes leisure activities, including walking and cycling, Such activities potentially can lead to air quality improvements through reduced reliance on motor vehicles. Leisure facilities also have the potential to divert pressure away from Habitats sites. There is potential for new recreational/leisure facilities and infrastructure to impact on Habitats sites, but no proposals or quantum of development has been put forward in this respect. Allocated site AS2/001 requires the re-location of the existing Youth Club on the same development site.	No LSE therefore no in-combination effect.	Screened out

Infrastructure and delivery						
ID1:	*Infrastructure and Delivery*	Infrastructure provision is a key element in the delivery of the SBC Local Plan. The Spelthorne Infrastructure Delivery Plan outlines the capacity and quality of existing infrastructure, including planned improvements. The planning system allows SBC to ensure that there is adequate infrastructure in place to support new development. Article 5 states : Development proposals, including those allocated in this plan which give rise to a need for infrastructure improvements, will be expected to mitigate their impact, whether individually or cumulatively, and at a rate and scale to meet the needs that arise from that development or a phase of that development. The standards of infrastructure delivery will be expected to comply with other policies set out within this Plan	South West London Waterbodies SPA/Ramsar site Windsor Forest and Great Park Thames Basin Heaths SPA/Thursley Ash Pirbright and Chobham Common SAC	Any development to support economic growth has the potential for increased traffic (and therefore impacts on air quality). These objectives could result in development in proximity to Habitats sites which could lead to LSE.	Any increase in traffic due to development to support demographic change has the potential to give rise to 'in-combination' effects with other plans and projects. Visitor pressure may be further increased as a result of additional residents and journeys delivered under Local Plan policies and development schemes.	Screened in
ID2:	*Sustainable Transport for New Developments*	The planning process for new developments provides the opportunity to maximise the use of sustainable and active travel modes such as walking, cycling and the increased use of public and community transport. SBC will require	All Habitats sites	This is a positive policy to drive significantly improved environmental conditions in the SBC area, including air and water quality. This improvement in environmental quality is	No LSE therefore no in-combination effect.	Screened out

		development proposals to incorporate opportunities to facilitate sustainable and active modes of travel.		driven primarily by human health considerations, however, an improvement in air quality through reductions in NOx concentrations will have a positive impact on levels of atmospheric pollution at Habitats sites.		

8 CONCLUSIONS

8.1.1. This document provides guidance on the likely data sources, information requirements and the process of HRA Screening and other stages of assessment if necessary. It also provides an indication of where the ecological implications of the Spelthorne Borough Local Plan will lie and which Habitats sites are vulnerable to known pressures, threats and existing air quality impacts.

8.1.2. There are a number of Habitats sites within SBC's administrative area and within 10km (i.e. the identified ZOI) of the Allocated sites and as such there will be implications for some of these Habitats sites from the policies of the Local Plan.

8.1.3. A number of policies have been screened-out due to their nugatory or beneficial effects on Habitats sites, but two policies were screened-in (ST2 the Spatial Development Framework and ID1 – Infrastructure and Delivery) for their further consideration at Stage 2 AA. These policies have potential for LSE on nearby Habitats sites relating to increased traffic (and therefore impacts on air quality) and increased recreational and development pressures.

8.1.4. Given the possibility of LSE associated with the screened-in interventions, further, detailed assessment is considered necessary to satisfy the requirements of the Habitats Regulations.

8.1.5. Statutory consultation forms an essential part of an HRA exercise and as noted in Section 7.2.19 three consultations and a single meeting have already taken place with Natural England. The final conclusions and recommendations of this HRA report will also be subject to consultation comments and advice from Natural England.

FIGURES

Figure 1 – Allocated sites within the SBC boundary

Figure 2 - Habitats sites within 10km of the Allocated sites

Appendix A

LEGISLATIVE BACKGROUND, POLICY CONTEXT AND CEJU RULINGS

LEGISLATIVE BACKGROUND

Refer to Section 2.1.14 above for arrangement post Brexit.

The Conservation of Habitats and Species Regulations (2017, as amended) (the 'Habitats Regulations') protects habitats and species of Habitats sites. The Habitats Regulations establishes a network of internationally important sites designated for their ecological status. SACs are designated under the Habitats Regulations and promote the protection of flora, fauna and habitats. SPAs are designated in order to protect vulnerable and migratory bird species. These sites combine to create a Europe-wide 'Natura 2000' network of designated sites.

Under the Habitats Regulations 'Competent Authorities' must assess Plans, in this case the LTP and associated plans, for their potential to cause Likely Significant Effects (LSE) on Habitats sites. Where the Plan may lead to LSE it must be subject to an HRA to determine whether there will be adverse effects to any Habitats sites. Any Plan that would lead to adverse effects on the integrity of Habitats site(s) cannot be permitted without meeting strict additional tests.

According to the Habitats Regulations, any plan or project likely to have a significant effect on a Habitats site, either individually or in combination with other plans or projects should undergo an appropriate assessment to determine its implications for the site. The Competent Authority can only agree to the plan or project after having ascertained that it will not adversely affect the integrity of the site concerned.

The purpose of the Habitats sites network is preservation of examples of species and habitats across the UK and Europe, rather than preservation of individual sites. In exceptional circumstances, a plan or project may still be allowed to go ahead, in spite of a negative assessment, provided there are no alternative solutions and the plan or project is considered to be of overriding public interest[38]. In such cases the UK Government must take appropriate compensatory measures to ensure that the overall coherence of the Natura 2000 Network is protected.

Regulation 63 (1) of the Habitats Regulations states that '…a Competent Authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which—

(a) is likely to have a significant effect on a Habitats site or a European offshore marine site (either alone or in combination with other plans or projects), and

(b) is not directly connected with or necessary to the management of that site,

—must make an appropriate assessment of the implications for that site in view of that site's conservation objectives.'

[38] An exact definition of 'imperative reasons of overriding public interest' is not provided, but EC guidance states
'It is reasonable to consider that the "imperative reasons of overriding public interest, including those of social and economic nature" refer to situations where plans or projects envisaged prove to be indispensable:
- within the framework of actions or policies aiming to protect fundamental values for the citizens' life (health, safety, environment);
- within the framework of fundamental policies for the State and the Society;
- within the framework of carrying out activities of economic or social nature, fulfilling specific obligations of public service.'

The Habitats Regulations also make allowance for projects or plans to be completed if they satisfy 'imperative reasons of overriding public interest'[39]. Regulation 64 relates to such situations.

The requirements of the Habitats Regulations are usually met by undertaking an initial two-stage approach; Stage 1 screening of potential LSEs on the qualifying features and conservation objectives of Habitats sites, and then, for those Habitats sites where this applies, a Stage 2 'Appropriate Assessment' of the adverse effects on the integrity of those Habitats sites of the LTP policies.

It should be noted that the competent authority (Shropshire Council) undertakes the Screening and Appropriate Assessment, the consultant provides the information or evidence-base to allow this to be completed. The competent authority must include consideration of 'in-combination' effects arising from other projects and plans within their assessment, as well as those potentially acting alone. Given the scale of the HRA the in-combination exercise will likely consider in-County, as well as outside-County interactions with Habitats sites.

[39] '*(a) reasons relating to human health, public safety or beneficial consequences of primary importance to the environment; or. (b) any other reasons which the Competent Authority, having due regard to the opinion of the Commission, consider to be imperative reasons of overriding public interest.'*

POLICY CONTEXT

NATIONAL PLANNING POLICY FRAMEWORK (2019)

The NPPF sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other development can be produced. It must be taken into account in preparing the development plan and is a material consideration in planning decisions.

The NPPF states that when considering the conservation and enhancement of the natural environment, with regard to habitats and biodiversity, the Local Planning Authority should:

'…protect and enhance biodiversity and geodiversity, plans should:

a) *Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*

b) *promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.*

The following should be given the same protection as Habitats sites:

a) *potential Special Protection Areas and possible Special Areas of Conservation;*

b) *listed or proposed Ramsar sites; and*

c) *sites identified, or required, as compensatory measures for adverse effects on Habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.*

The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a Habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the Habitats site.'

THE COUNCIL FOR JUSTICE OF THE EUROPEAN UNION (CJEU) RULINGS

A number of CJEU rulings are relevant to the HRA screening exercise and are noted below. At the present time the position, under section 6(3) EU (Withdrawal) Act 2018 (as amended), is that the courts in the UK, with the sole exception of the Supreme Court, will continue to be bound by HRA judgments handed down by the CJEU and by domestic courts prior to 31 December 2020 when interpreting the Conservation of Habitats and Species Regulations 2017 (as amended). This is the case as long as the Conservation of Habitats and Species Regulations 2017 (as amended) remain unmodified by Parliament. The Supreme Court will, however, be at liberty to depart from these judgments after 31 December 2020 if they consider it appropriate to do so.[40]

THE WEALDEN JUDGEMENT

The Wealden Judgement[41], handed down in March 2017, has introduced additional complexities into the assessment process in relation to in-combination and cumulative effects.

Prior to this Judgement, air quality impacts on Habitats sites were only considered alongside roads where the traffic growth associated with the individual Plan or Project being assessed exceeded specified screening criteria. These criteria were typically based on changes in vehicle movements and taken from the Design Manual for Roads and Bridges (DMRB, HA207/07[42]), which has been subsequently withdrawn namely:

- increases of 1000 vehicles per day or 200 Heavy Goods Vehicles per day (as Annual Average Daily Traffic (AADT)).

The Wealden Judgement found that the application of the criteria to the traffic growth associated with a single Local Plan was unsound on the basis that two Local Plans collectively contributing more than 1000 AADT could lead to a potentially significant effect. The Judge determined that further assessment of air quality impacts on Habitats sites should have been carried out and quashed part of the Local Plan that would have led to an in-combination exceedance of 1,000 AADT.

The Wealden Judgement means that every single plan or project which, alone, is predicted to give rise to any increase in traffic or other air emission (however small) must be subjected to an in-combination assessment with other plans or projects (which would include those plans or projects

[40] Freeths Habitats Regulations update 2020. Available at: https://communications.freeths.co.uk/44/1637/october-2020/the-habitats-regulations-assessment-regime-after-31-december-2020---how-will-it-look-.asp?sid=8bf6fad5-597a-43c6-8f70-61503ec0adb9
[41] Judgment in Wealden District Council v. Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority [2017] EWHC 351 (Admin) DATE: 21 Mar 2017.
[42] *Design Manual for Roads and Bridges (DMRB), Volume 11, Section 3, Part 1 (HA207/07).* Withdrawn, but available online: https://standardsforhighways.co.uk/dmrb/archive/search/df0c77ed-887b-4c84-be0e-000fe18545ae Accessed [31/03/2022]

with a similar tiny impact). However, the judgement did not rule out the application of thresholds in principal and this approach is normally taken as the basis of the assessment.

The judgement has led to a more detailed analysis of three key questions to discern which plans and project are those where a detailed "in combination" assessment is required in relation to changes in air quality:

1. Is your plan or project putting emissions into the air?;

2. If so, are those emissions at a level where they could actually be measured / perceived?; and

3. If so, is there a realistic (rather than hypothetical) risk that those emissions, alone, will have an adverse effect on the ecology of a SAC / SPA?

A fuller justification will be required when applying the threshold approach.

PEOPLE OVER WIND (THE SWEETMAN CASE)

The Court of Justice of the European Union's (CJEU's) decision in the matter of People Over Wind and Sweetman v Coillte Teoranta (C-323/17)[43] (hereafter referred to as the 'Sweetman Case'), states that:

'Article 6(3) ……. must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an Appropriate Assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site.'

In the new judgement the CJEU concluded that mitigation measures could not be considered as part of the project, and thus that the screening stage of HRA should not take account of them. This will undoubtedly be tested further in the courts in coming months and years, but the key issue is whether the mitigation measures proposed can genuinely be considered as part of the project, in that they would happen in any case, irrespective of the Habitats site. If not, then they should be considered mitigation measures, and considered at the Appropriate Assessment stage of HRA.

This is an emerging issue for local authorities and means that, because of the potential for 'in-combination effects and the fact that HRA Screening should not take into account measures targeted at mitigating effects on Habitats sites. Therefore, it is becoming increasingly commonplace for local authorities to conduct an Appropriate Assessment of all project, plans and planning applications (i.e. these are often no longer screened out, by way of an HRA Screening as has been the practise to date).

[43] Judgement of the Court 12 April 2018, People Over Wind, Peter Sweetman, Coillte Teoranta Available online: https://curia.europa.eu/juris/document/document.jsf;jsessionid=B02FE6F4F1C61308615DBBDF079EE5F4?text=&docid=200970&pageIndex=0&doclang=en&mode=lst&dir=&occ=first&part=1&cid=11190634 Accessed [27/04/2022]

CJEU RULING IN THE NETHERLANDS NITROGEN AND AGRICULTURE CASES C-293/17 AND C-294/17

The final Court Judgement in relation to these two cases was handed down on the 7th November 2018. The judgement relates to the assessment of agricultural activities under the Habitats Regulations, but has potential implications for the assessment of changes in nitrogen (N) deposition in relation to air quality. Notably, the Court of Justice of the European Union ruled that:

- An 'appropriate assessment' may only take into account the existence of Article 6(1) 'conservation measures', or Article 6(2) 'preventive measures', or specific measures adopted for a conservation programme, or 'autonomous' measures not in the programme, if the expected benefits of those measures are certain at the time of the assessment.
- National measures such as procedures for the surveillance and monitoring of farms whose activities cause nitrogen deposition and the possibility of imposing penalties, up to and including the closure of those farms, are sufficient for the purposes of complying with Article 6(2).

Of particular relevance to the assessment of air quality effects on Habitats sites, the Court of Justice of the European Union ruled that:

"An 'appropriate assessment' may only take into account the existence of Article 6(1) 'conservation measures', or Article 6(2) 'preventive measures', or specific measures adopted for a conservation programme, or 'autonomous' measures not in the programme, if the expected benefits of those measures are certain at the time of the assessment.

The Ruling makes clear that certainty and a thorough and in-depth examination of the scientific soundness is required that that there is no reasonable scientific doubt as to the absence of adverse effects of each plan or project on the integrity of the site concerned.

KOKOTT RULING

In the Opinion of Advocate General Kokott in Case C-6/04 Commission v UK [2005] ECR I-9017 at paragraph 49 she noted that an assessment of plans cannot by definition take into account all effects because

"Many details are regularly not settled until the time of the final permission" and "[i]t would also hardly be proper to require a greater level of detail in preceding plans or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure".

Appendix B

HABITATS SITES DETAILS, INCLUDING QUALIFYING FEATURES AND CONSERVATION OBJECTIVES

Site Name	Site Size (Ha)	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet	Activities with greatest effect upon the site, as listed on Natura 2000 standard data forms and Information Sheets for Ramsar Wetlands	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure)	Conservation Objectives
Richmond Park SAC	846.3	**Annex II species that are a primary reason for selection of this site** ▪ 1083 Stag beetle *Lucanus cervus* Richmond Park has a large number of ancient trees with decaying timber. It is at the heart of the south London centre of distribution for stag beetle *Lucanus cervus* and is a site of national importance for the conservation of the fauna of invertebrates associated with the decaying timber of ancient trees.	▪ No threats listed[44]	▪ No current issues affecting the Natura 2000 feature(s) have been identified on this site [45]	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; ▪ The extent and distribution of the habitats of qualifying species ▪ The structure and function of the habitats of qualifying species ▪ The supporting processes on which the habitats of qualifying species rely ▪ The populations of qualifying species, and, ▪ The distribution of qualifying species within the site.[46]
South West London Waterbodies Ramsar	828.1	**Ramsar criterion 6 –** species/populations occurring at levels of international importance. Qualifying Species/populations (as identified at designation): Species with peak counts in spring/autumn: ▪ Northern shoveler *Anas clypeata* (NW and C Europe) - 397 individuals, representing an average of 2.6% of the GB population (5-year peak mean 1998/9-2002/3) Species with peak counts in winter: ▪ Gadwall *Anas strepera strepera* (NW Europe) - 487 individuals, representing an average of 2.8% of the GB population (5-year peak mean 1998/9- 2002/3)	▪ No factors reported[47]		
South West London Waterbodies SPA	825.1	**ARTICLE 4.2 QUALIFICATION (79/409/EEC)** **Over winter the area regularly supports:** ▪ Shoveler *Anas clypeata* (North-western/Central Europe) - 2.1% of the population (Five-year peak mean for 1993/94 to 1997/98)	▪ I02 - Problematic native species ▪ K01 - Abiotic (slow) natural processes ▪ M02 - Changes in biotic conditions	▪ P/T – Public access/ disturbance ▪ P/T – Changes in species distributions ▪ P/T – Invasive species	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

[44] Richmond Park SAC Natura 2000 form. Available at: https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0030246.pdf (Accessed on: 26/01/2021)
[45] Richmond Park Site Improvement Plan. Available at: http://publications.naturalengland.org.uk/file/4641498714865664 (Accessed on 26/01/2021)
[46] Richmond Park SAC Conservation Objectives. Available at: http://publications.naturalengland.org.uk/file/5521612917178368 (Accessed on: 26/01/2021)
[47] South West London Waterbodies Ramsar Natura 2000 form. Available at: https://jncc.gov.uk/jncc-assets/RIS/UK11065.pdf (Accessed on: 26/01/2021)

Site Name	Site Size (Ha)	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet	Activities with greatest effect upon the site, as listed on Natura 2000 standard data forms and Information Sheets for Ramsar Wetlands	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure)	Conservation Objectives
		▪ Gadwall *Anas strepera* (North-western Europe) - 2.4% of the population (Five-year peak mean for 1993/94 to 1997/98)	▪ G01 - Outdoor sports and leisure activities, recreational activities ▪ F01 - Marine and Freshwater Aquaculture[48]	▪ P/T Natural changes to site conditions ▪ P – Fisheries: Fish stocking ▪ T – Inappropriate weed control[49]	▪ The extent and distribution of the habitats of the qualifying features ▪ The structure and function of the habitats of the qualifying features ▪ The supporting processes on which the habitats of the qualifying features rely ▪ The population of each of the qualifying features, and, ▪ The distribution of the qualifying features within the site.[50]
Thames Basin Heaths SPA	8309.5	**ARTICLE 4.1 QUALIFICATION (79/409/EEC)** **During the breeding season the area regularly** supports: ▪ European nightjar *Caprimulgus europaeus* - 7.8% of the GB breeding population (Count mean (RSPB 1998-99)) ▪ Woodlark *Lullula arborea* - 9.9% of the GB breeding population (Count as at 1997 (Wotton and Gillings 2000)) ▪ Dartford Warbler *Sylvia undata* - 27.8% of the GB breeding population (Count as at 1999 (RSPB))	▪ H04 – Air pollution, air-borne pollutants ▪ G05 – Other human intrusions and disturbances ▪ K02 – Biocenotic evolution, succession ▪ B02 – Forest and Plantation management and use ▪ G01 – Outdoor sports and leisure activities, recreational activities[51]	▪ P/T – Public access/ disturbance ▪ P – Undergrazing ▪ P – Forestry and woodland management ▪ T - Hydrological changes ▪ P - Inappropriate scrub control ▪ P/T – Invasive species ▪ P – Wildlife/ arson ▪ P/T – Air pollution: Impact of atmospheric nitrogen deposition ▪ T – Feature location/ extent/ condition unknown ▪ T -Military ▪ P – Habitat fragmentation[52]	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; ▪ The extent and distribution of the habitats of the qualifying features ▪ The structure and function of the habitats of the qualifying features ▪ The supporting processes on which the habitats of the qualifying features rely ▪ The population of each of the qualifying features, and, ▪ The distribution of the qualifying features within the site.[53]
Thursley, Ash, Pirbright and Chobham SAC	5154.5	**Annex I habitats that are a primary reason for selection of this site** ▪ 4010 Northern Atlantic wet heaths with *Erica tetralix* This site represents lowland northern Atlantic wet heaths in south-east England. The wet heath at Thursley is NVC type M16 *Erica tetralix – Sphagnum compactum* and contains several rare plants, including great sundew *Drosera anglica*, bog hair-grass *Deschampsia setacea*, bog orchid *Hammarbya paludosa* and brown beak-sedge *Rhynchospora fusca*. There are transitions to valley bog and dry heath. Thursley Common is an important site for	▪ G05 - Other human intrusions and disturbances ▪ A04 - Grazing ▪ H04 - Air pollution, air-borne pollutants ▪ J02 - Human induced changes in hydraulic conditions ▪ K02 - Biocenotic evolution, succession[54]	▪ See above (Thames Basin Heaths SPA)	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; ▪ The extent and distribution of qualifying natural habitats ▪ The structure and function (including typical species) of qualifying natural habitats, and

[48] South West London Waterbodies SPA Natura 2000 form. Available at: https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9012171.pdf (Accessed on:26/01/2021)
[49] South West London Waterbodies SPA Site Improvement Plan. Available at: http://publications.naturalengland.org.uk/file/5135484288237568 (Accessed on: 26/01/2021)
[50] South West London Waterbodies SPAConservation Objectives. Available at: http://publications.naturalengland.org.uk/file/5411059804667904 (Accessed on: 26/01/2021)
[51] Thames Basin Heaths SPA Natura 2000 form. Available at: https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9012141.pdf (Accessed on: 26/01/2021)
[52] Thames Basin (Thames Basin Heaths SPA, Thursley, Ash, Pirbright & Chobham SAC) Site Improvement Plan. Available at: http://publications.naturalengland.org.uk/file/5946121331408896 (Accessed on: 26/01/2021)
[53] Thames Basin Heaths SPA Conservation Objectives. Available at: http://publications.naturalengland.org.uk/file/5048458801315840 (Accessed on: 26/01/2021)
[54] Thursley, Ash, Pirbright and Chobham SAC Natura 2000 form. Available at: https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0012793.pdf (Accessed on: 26/01/2021)

Site Name	Site Size (Ha)	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet	Activities with greatest effect upon the site, as listed on Natura 2000 standard data forms and Information Sheets for Ramsar Wetlands	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure)	Conservation Objectives
		invertebrates, including the nationally rare white-faced darter *Leuccorhinia dubia*. ▪ 4030 European dry heaths This south-east England site contains a series of large fragments of once-continuous heathland. It is selected as a key representative of NVC type H2 *Calluna vulgaris – Ulex minor* dry heathland. This heath type has a marked south-eastern and southern distribution. There are transitions to wet heath and valley mire, scrub, woodland and acid grassland, including types rich in annual plants. The European dry heaths support an important assemblage of animal species, including numerous rare and local invertebrate species, European nightjar *Caprimulgus europaeus*, Dartford warbler *Sylvia undata*, sand lizard *Lacerta agilis* and smooth snake *Coronella austriaca*. ▪ 7150 Depressions on peat substrates of the *Rhynchosporion* This site contains examples of Depressions on peat substrates of the *Rhynchosporion* in south-east England, where it occurs as part of a mosaic associated with valley bog and wet heath. The vegetation is found in natural bog pools of patterned valley mire and in disturbed peat of trackways and former peat-cuttings.			The supporting processes on which qualifying natural habitats rely. [55]
Wimbledon Common SAC	51.4	**Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site** ▪ 4010 Northern Atlantic wet heaths with *Erica tetralix* ▪ 4030 European dry heaths **Annex II species that are a primary reason for selection of this site** ▪ 1083 Stag beetle *Lucanus cervus* Wimbledon Common has a large number of old trees and much fallen decaying timber. It is at the heart of the south London centre of distribution for stag beetle *Lucanus cervus*, and a relatively large number of records were received from this site during a recent nationwide survey for the species. The site supports a number of other scarce invertebrate species associated with decaying timber.	▪ J03 - Other ecosystem modifications ▪ I01 – Invasive non-native species ▪ B02 – Forest and Plantation management and use ▪ H04 – Air pollution, air-borne pollutants[56]	▪ P– Public disturbance ▪ T – Invasive species ▪ T – Habitat fragmentation ▪ P – Air Pollution: impact of atmospheric nitrogen deposition[57]	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; ▪ The extent and distribution of qualifying natural habitats and habitats of qualifying ▪ species ▪ The structure and function (including typical species) of qualifying natural habitats ▪ The structure and function of the habitats of qualifying species ▪ The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely ▪ The populations of qualifying species, and,

[55] Thursley, Ash, Pirbright and Chobham SAC Conservation Objectives. Available at: http://publications.naturalengland.org.uk/file/4677991053656064 (Accessed on: 26/01/2021)
[56] Wimbledon Common SAC Natura 2000 form. Available at: https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0030301.pdf (Accessed on: 26/01/2021)
[57] Wimbledon Common SAC Site Improvement Plan. Available at: http://publications.naturalengland.org.uk/file/5097829219434496 (Accessed on: 26/01/2021)

Site Name	Site Size (Ha)	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet	Activities with greatest effect upon the site, as listed on Natura 2000 standard data forms and Information Sheets for Ramsar Wetlands	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure)	Conservation Objectives
					▪ The distribution of qualifying species within the site.[58]
Windsor Forest and Great Park SAC	1680.2	**Annex I habitats that are a primary reason for selection of this site** ▪ 9190 Old acidophilous oak woods with *Quercus robur* on sandy plains Windsor represents old acidophilous oak woods in the south-eastern part of its UK range. It has the largest number of veteran oaks *Quercus* spp. in Britain (and probably in Europe), a consequence of its management as wood-pasture. It is of importance for its range and diversity of saproxylic invertebrates, including many rare species (e.g. the beetle *Lacon querceus*), some known in the UK only from this site, and has recently been recognised as having rich fungal assemblages. Windsor Forest and Great Park has been identified as of potential international importance for its saproxylic invertebrate fauna by the Council of Europe. **Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site** ▪ 9120 *Atlantic acidophilous* beech forests with *Ilex* and sometimes also Taxus in the shrublayer (*Quercion robori-petraeae* or *Ilici-Fagenion*) **Annex II species that are a primary reason for selection of this site** ▪ 1079 Violet click beetle *Limoniscus violaceus* Violet click beetle *Limoniscus violaceus* was first recorded at Windsor Forest in 1937. The site is thought to support the largest of the known populations of this species in the UK. There is a large population of ancient trees on the site, which, combined with the historical continuity of woodland cover, has resulted in Windsor Forest being listed as the most important site in the UK for fauna associated with decaying timber on ancient trees (Fowles, Alexander and Key 1999). The site was also identified as of potential international importance for its saproxylic invertebrate fauna by the Council of Europ.	▪ H04 - Air-pollution, air-borne pollutants ▪ I01 – Invasive non-native species ▪ B02 – Forest and Plantation management and use ▪ K04 – Interspecific floral relations[59]	▪ P/T – Forestry and woodland management ▪ T – Invasive species ▪ T – Disease ▪ P – Air Pollution: impact of atmospheric nitrogen deposition[60]	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; ▪ The extent and distribution of qualifying natural habitats and habitats of qualifying species ▪ The structure and function (including typical species) of qualifying natural habitats ▪ The structure and function of the habitats of qualifying species ▪ The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely ▪ The populations of qualifying species, and, ▪ The distribution of qualifying species within the site.[61]

[58] Wimbledon Common SAC Conservation Objectives. Available at: http://publications.naturalengland.org.uk/file/6215672493506560 (Accessed on: 26/01/2021)
[59] Windsor Forest & Great Park SAC Natura 2000 form. Available at: https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0012586.pdf (Accessed on: 26/01/2021)
[60] Windsor Forest & Great Park SAC Site Improvement Plan. Available at: http://publications.naturalengland.org.uk/file/5106041196904448 (Accessed on: 26/01/2021)
[61] Windsor Forest & Great Park SAC Conservation Objectives. Available at: http://publications.naturalengland.org.uk/file/6569964010209280 (Accessed on: 26/01/2021)

Site Name	Site Size (Ha)	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet	Activities with greatest effect upon the site, as listed on Natura 2000 standard data forms and Information Sheets for Ramsar Wetlands	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure)	Conservation Objectives

Appendix C

APIS INFORMATION FOR SPA AND SAC SITES WHERE AIR POLLUTION IS LISTED AS A PRESSURE OR THREAT

Site	Distance from Spelthorne Boundary at nearest point	Species	Relevant Critical Load			N Deposition kg N/ha/yr			Ammonia Critical Level µg NH_3/m^3 annual mean	NH_3 Concentration µg/m^3		
			Relevant Habitat	Relevant CL Habitat	CL Range	Maximum	Minimum	Average		Maximum	Minimum	Average
Thames Basin Heaths SPA		*Caprimulgus europaeus* - European nightjar	Coniferous Woodland	Coniferous Woodland	5 - 15	26.5	19.9	21.8	3	1.46	0.9	1.04
			Dry Heaths	Dry Heaths	10- 20	15.7	12	13.1	3	1.46	0.9	1.04
		Lullula arborea - Wood lark	Coniferous Woodland	Coniferous Woodland	5 - 15	**26.5**	19.9	21.8	3	1.46	0.9	1.04
			Dry Heaths	Dry Heaths	10 - 20	15.7	12	13.8	3	1.46	0.9	1.04
		Sylvia undata - Dartford warbler	Dry Heaths	Dry Heaths	10 - 20	15.7	12	13.8	3	1.46	0.9	1.04
South West London Waterbodies		*Anas strepera* (North-western Europe) - Gadwall	Standing open water and canals	Standing open water and canals	No CL available	10.7	9.4	9.9	3	1.85	1.56	1.65
		Anas strepera (North-western Europe) - Gadwall	Neutral Grassland	Neutral Grassland	20 - 30	17.5	15.1	15.7	No CL Stated	1.85	1.56	1.65
		Anas strepera (North-western Europe) - Gadwall	Neutral Grassland	Neutral Grassland	20 - 30	17.5	15.1	15.7	No CL Stated	1.85	1.56	1.65
		Anas clypeata (North-western/Central Europe) - Northern shoveler	Standing open water and canals	Standing open water and canals	No CL available	10.7	9.4	9.9	3	1.85	1.56	1.65
		Anas clypeata (North-western/Central Europe) - Northern shoveler	Standing open water and canals	Standing open water and canals	No CL available	10.7	9.4	9.9	3	1.85	1.56	1.65

Site	Species	Relevant Critical Load			N Deposition kg N/ha/yr			Ammonia Critical Level µg NH_3/m^3 annual mean	NH_3 Concentration µg/m^3		
		Relevant Habitat	Relevant CL Habitat	CL Range	Maximum	Minimum	Average		Maximum	Minimum	Average
Richmond Park SAC	*Lucanus cervus* - Stag beetle	Broadleaved deciduous woodland	Broadleaved deciduous woodland	10 - 20	29.6	27.5	28.4	3	1.87	1.7	1.77
Thursley, Ash, Pirbright & Chobham SAC	Depressions on peat substrates of the *Rhynchosporion*	Depressions on peat substrates of the *Rhynchosporion*	Valley mires, poor fens and transition mires	10- 15	15.7	12	12.7	1	1.46	0.79	0.94
	Northern Atlantic wet heaths with *Erica tetralix*	Northern Atlantic wet heaths with *Erica tetralix*	Northern wet heath: *Erica tetralix* dominated wet heath	10- 20	15.7	12	12.7	1	1.46	0.79	0.94
	European dry heaths	European dry heaths	Dry heaths	10- 20	15.7	12	12.7	1	1.46	0.79	0.94
Wimbledon Common SAC	Northern Atlantic wet heaths with *Erica tetralix*	Northern Atlantic wet heaths with *Erica tetralix*	Northern wet heath: *Erica tetralix* dominated wet heath	10 - 20	16.9	16.9	16.9	1	1.87	1.87	1.87
	European dry heaths	European dry heaths	Dry heaths	10 - 20	16.9	16.9	16.9	1	1.87	1.87	1.87
	Lucanus cervus - Stag beetle	Broadleaved deciduous woodland	Broadleaved deciduous woodland	10 - 20	29.6	29.6	29.6	3	1.87	1.87	1.87
Windsor Forest & Great Park SAC	Old acidophilous oak woods with Quercus robur on sandy plains	Old acidophilous oak woods with *Quercus robur* on sandy plains	Acidophilous *Quercus*-dominated woodland	10-15	27.8	20.8	23	Site specific	1.81	0.97	1.2
	Limoniscus violaceus - Violet click beetle	Broadleaved deciduous woodland	Broadleaved deciduous woodland	10-20	27.8	20.9	23	3	1.81	0.97	1.2
	Atlantic acidophilous beech forests with *Ilex* and sometimes also *Taxus* in the shrublayer (*Quercion robori-petraeae* or *Ilici-Fagenion*)	Atlantic acidophilous beech forests with *Ilex* and sometimes also *Taxus* in the shrublayer (*Quercion robori-petraeae* or *Ilici-Fagenion*)	Fagus woodland	10-20	27.8	20.9	23	Site specific	1.81	0.97	1.2

APPENDIX TITLE

Grosvenor House
2 Grosvenor Square
Southampton, Hampshire
SO15 2BE

wsp.com

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Equality Analysis Template

Directorate: Regeneration & Growth **Service Area:** Strategic Planning	**Lead Officer**: Ann Biggs, Strategic Planning Manager **Date completed:** June 2022
Service / Function / Policy / Procedure to be assessed: **Draft Local Plan and Staines Development Framework**	
Is this: New / Proposed ☑ Existing/Review ☐ Changing ☐ **(Please tick appropriate box)**	**Review date:** 06/06/2022

Part A – Initial Equality Analysis to determine if a full Equality Analysis is required.

What are the aims and objectives/purpose of this service, function, policy or procedure?

The Local Plan sets out the Council's plan for housing, employment and infrastructure for the 15-year period from adoption. contains policies for determining planning applications

Please indicate its relevance to any of the equality duties (below) by selecting Yes or No?

	Yes	No
Eliminating unlawful discrimination, victimisation and harassment		☑
Advancing equality of opportunity	☑	
Fostering good community relations	☑	

If not relevant to any of the three equality duties and this is agreed by your Head of Service, the Equality Analysis is now complete. **If relevant**, a Full Equality Analysis will need to be undertaken (PART B below).

PART B: Full Equality Analysis.

Step 1 – Identifying outcomes and delivery mechanisms (in relation to what you are assessing)

What outcomes are sought and for whom?	Inherent to the production of a Local Plan are the principles of sustainability, which are to balance the environmental, economic and social impacts and benefits of policies. These affect all our residents but also businesses and visitors to the Borough.
Are there any associated policies, functions, services or procedures?	The Local Plan, including supplementary planning guidance such as the Staines Development Framework, which is being produced alongside the Plan, contains policies and guidance used in decision making on planning applications and enforcement action. The production of this document is a statutory requirement for local planning authorities, including the need to review it regularly
If partners (including external partners) are involved in delivering the service, who are they?	There is a long list of statutory consultees involved in the production of the Plan by providing evidence and helping to deliver the policy aims, as well as other external partners. They include Surrey County Council, neighbouring local authorities, the Environment Agency, National Highways, utility companies and community groups. A full list can be obtained on request from the Stretgic Planning team.

Step 2 – What does the information you have collected, or that you have available, tell you?

What evidence/data already exists about the service and its users? (in terms of its impact on the 'equality strands', i.e. race, disability, gender, gender identity, age, religion or belief, sexual orientation, maternity/pregnancy, marriage/civil partnership and other socially excluded communities or groups) and **what does the data tell you?** e.g. are there any significant gaps?

The production of a Local Plan is governed by regulation and requires Sustainability Appraisal throughout, which includes consideration of social impacts and benefits from emerging policies. Individual assessment of these policies follows below.

Has there been any consultation with, or input from, customers / service users or other stakeholders? If so, with whom, how were they consulted and what did they say? If you haven't consulted yet and are intending to do so, please list which specific groups or communities you are going to consult with and when.

On the Local Plan, we have undertaken two public consultations (known as the Regulation 18 stage). These were Issues & Options in May/June 2018 and Preferred Options in November 2019 – January 2020. On the Staines Development Framework, we have undertaken one public consultation on Objectives & Options in May/June 2021. We are commencing the Regulation 19 public consultation from 15 June to 5 September 2022 on the Local Plan and a second stage of public consultation on the Staines Development Framework concurrently. The consultation aims to reach as many groups and individuals in the Borough as possible through a variety of channels. We also consult with statutory consultees and other external partners who have an interest in the Local Plan and delivery of its policies. A full list of those is available on request from the Strategic Planning team. It should also be noted that accessibility has also been taken into account in the production of consultation material (further details available on request).

Are there any complaints, compliments, satisfaction surveys or customer feedback that could help inform this assessment? If yes, what do these tell you?

All feedback received in writing from every public consultation is analysed and included in a consultation response document, which is publicly available on our website. These representations have then been used to inform the next stage of the relevant plan. Past consultation response documents are available on the Local Plan section of Spelthorne's website and we will also publish a schedule of comments received during this stage of consultation, noting that for Regulation 19 these no longer inform further changes but are sent to the Planning Inspectorate together with the Submission Version of the Local Plan.

Step 3 – Identifying the negative impact

Individual assessment of Local Plan policies. This also draws on assessment of policies through the Sustainability Appraisal and scoping report, which are available to view at www.spelthorne.gov.uk. It should be noted that in terms of positive benefits, policies need to be limited to planning requirements on development, which has a legal definition, and cannot impose additional burdens on developers. There may be other corporate strategies and policies that can deliver further positive benefits on equality themes. Planning policies must also conform with national policy and guidance and be 'sound', which includes that they are deliverable and do not restrict development through rendering schemes financially unviable.

Local Plan Policy	Positive/Neutral/Negative (R/A/G) impact on equality themes[1]	Comments
ST1: Presumption in favour of sustainable development	0	
ST2: Planning for the Borough	0	
PS1: Responding to the climate emergency	0	
PS2: Designing places and spaces	0	
PS3: Heritage, conservation and landscape	0	
SP1: Staines upon Thames	0	
SP2: Ashford, Shepperton and Sunbury Cross	0	
SP3: Stanwell and Stanwell Moor	0	

[1] **Age** (including children, young people and older people), **Disability** (including carers), **Gender** (men and women), **Race** (including Gypsies & Travellers and Asylum Seekers), **Religion or belief** (including people of no religion or belief), **Gender Reassignment** (those that are going through transition: male to female or female to male), **Pregnancy and Maternity**, **Sexual Orientation** (including gay, lesbian, bisexual and heterosexual)

SP4: Green Belt	0	
SP5: Colne Valley Regional Park	0	
SP6: River Thames and its tributaries	0	
SP7: Heathrow Airport	0	
H1: Homes for all	+	Policy aims to deliver accessible homes for the disabled and specialist accommodation for the elderly and those with particular needs
H2: Affordable housing	0	
H3: Meeting the needs of Gypsy, Traveller and Travelling Showpeople	+	Policy aims to deliver additional pitches to meet accommodation needs and safeguard existing sites. Two allocations in the Local Plan also provide designated sites to meet identified need.
E1: Green and blue infrastructure	0	
E2: Biodiversity	0	
E3: Managing flood risk	0	
E4: Environmental protection	0	
E5: Open space and recreation	0	
EC1: Meeting employment needs	0	

EC2: Retail	0	
EC3: Local centres, shopping parades and isolated retail units	0	
EC4: Leisure and culture	0	
ID1: Infrastructure and delivery	0	
ID2: Sustainable transport for new developments	0	

Step 4 – Changes or mitigating actions proposed or adopted

Having undertaken the assessment are there any changes necessary to the existing service, policy, function or procedure? What changes or mitigating actions are proposed?

The above assessment demonstrates that none of the Local Plan policies will have a negative impact on policy themes. The Staines Development Framework (SDF) will be supplementary planning document to provide guidance that relies on the Local Plan policies as the 'hook' so there are no negative impacts identified for the SDF either. It is noted that two policies have a direct and tangibly positive benefit on equality themes through requirements of development. All other impacts and benefits have been identified as neutral. Whilst there are overall benefits to Spelthorne's residents through the Local Plan policies, there are no others where a direct benefit to an equalities group can be identified over and above the rest of the community. For further more detailed assessment on the social impact of the Local Plan, please see the Sustainability Appraisal of the individual policies: www.spelthorne.gov.uk/localplan.

Step 5 – Monitoring

How are you going to monitor the existing service, function, policy or procedure ?

Once the Local Plan has been adopted, it will be monitored on an annual basis through the Authority Monitoring Report. This is published every year on our website: www.spelthorne.gov.uk/amr and currently monitors the existing Core Strategy and Policies DPD 2009 policies.

Equality Analysis approved by:

Group Head: 	Date: 16/11/22 (Approved via email June 2022)