



*Please reply to:*

Contact: Christeen Abee  
Service: Committee Services  
Direct Line: 01784 446224  
E-mail: [c.abee@spelthorne.gov.uk](mailto:c.abee@spelthorne.gov.uk)  
Date: 11 March 2026

## Notice of meeting

### Environment and Sustainability Committee

**Date:** Thursday, 19 March 2026

**Time:** 7.00 pm

**Place:** Council Chamber, Council Offices, Knowle Green, Staines-upon-Thames TW18 1XB

#### To the members of the Environment and Sustainability Committee

Councillors:

J.A. Turner (Chair)

J.R. Boughtflower (Vice-Chair)

L. Barker

M. Beecher

T. Burrell

J.P. Caplin

D.C. Clarke

S.M. Doran

K.M. Grant

N. Islam

A. Mathur

H.R.D. Williams

P.N. Woodward

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

*Councillors are reminded that the Gifts and Hospitality Declaration book will be available outside the meeting room for you to record any gifts or hospitality offered to you since the last Committee meeting.*

**Spelthorne Borough Council, Council Offices, Knowle Green**

**Staines-upon-Thames TW18 1XB**

[www.spelthorne.gov.uk](http://www.spelthorne.gov.uk) [customer.services@spelthorne.gov.uk](mailto:customer.services@spelthorne.gov.uk) Telephone 01784 451499

# Agenda

Page nos.

- 1. Apologies and Substitutes**

To receive any apologies for absence and notification of substitutions.
- 2. Minutes** **5 - 10**

To confirm as a correct record the minutes of the Environment and Sustainability Committee meeting held on 8 January 2026 and the extraordinary meeting held on 27 January 2026.
- 3. Disclosures of Interest**

To receive any disclosures of interest from councillors in accordance with the Council's Code of Conduct for members.
- 4. Questions from members of the Public**

The Chair, or their nominee, to answer any questions raised by members of the public in accordance with Standing Order 40.

At the time of publication of this agenda no questions were received.
- 5. Statutory Consultation on Spelthorne Affordable Housing Supplementary Planning Document (SPD) and Climate Change Supplementary Planning Document (SPD)** **11 - 198**

Committee is asked to consider the consultation draft version of the Spelthorne Affordable Housing Supplementary Planning Document be published for a four-week public consultation.
- 6. Spelthorne Recycling Bring Sites** **199 - 210**

Committee is asked to consider the closure of selected bring sites located around the borough.
- 7. Public Consultation for Proposed Multi-Use Games Area (MUGA) at Memorial Gardens, Staines upon Thames** **211 - 230**

Committee is asked to consider the commencement of a public consultation exercise for the proposed new Multi-Use Games Area to be built in Memorial Gardens, Staines-upon-Thames.
- 8. The Spelthorne Borough Council Off-Street Parking Places (Amendment No.3) Order 2026** **231 - 246**

The Committee is asked to identify and recommend to the Corporate Policy and Resources committee the selected proposed variations to

The Spelthorne Borough Council Off-Street Parking Places  
(Amendment No. 3) Order 2026.

**9. Halliford Recreation Ground 247 - 254**

Committee is asked to consider the relocation of a play facility in the recreation ground from its current position in a wooded area to the open space within the same park.

**10. Updates from Task and Finish and/or Working Groups**

To receive an update on the following task and finish and/or working groups:

Community Infrastructure Levy Task Groups

Climate and Nature Working Group

**11. Forward Plan 255 - 258**

A copy of the Environment & Sustainability Committee Forward Plan is attached.

This page is intentionally left blank

**Minutes of the Environment and Sustainability Committee  
8 January 2026**

**Present:**

Councillor J.A. Turner (Chair)  
Councillor J.R. Boughtflower (Vice-Chair)

**Councillors:**

L. Barker	J.P. Caplin	K.M. Grant
M. Bing Dong	D.C. Clarke	A. Mathur
T. Burrell	S.M. Doran	H.R.D. Williams

**Substitutions:** Councillors K. Howkins (In place of P.N. Woodward)  
J.R. Sexton (In place of M. Beecher)

**Apologies:** Councillors N. Islam

**In Attendance:** Councillors C. Bateson

**1/26 Minutes**

The minutes of the meeting held on 13 November 2025 were agreed as a correct record.

**2/26 Disclosures of Interest**

There were none.

**3/26 Questions from members of the Public**

There were none.

**4/26 Formal Endorsement of SCC Retrofit Strategy**

The Committee considered a report from the Climate & Energy Lead requesting endorsement of Surrey County Council's Retrofit Strategic Action Plan. Endorsing the action plan would ensure that Spelthorne aligned with county-wide climate commitments and strengthen the Council's position within shared funding, delivery, and skills-development programmes. The action plan aimed to reduce emissions, improve energy efficiency in homes, and help meet Surrey-wide and national Net Zero commitments.

The Committee noted that social landlords had been invited to discussions regarding the strategy alongside representatives from all relevant industries and other local authorities. They would not be mandated to engage with the action plan, however there was an aim to create a culture that encouraged participation and knowledge sharing. There was no financial or material resource commitment other than officer time, which had already been taken into account.

The Committee **resolved** to:

- 1) Approve the formal endorsement of Surrey County Council Retrofit Strategic Action Plan; and
- 2) Approve the Chair of the Environment and Sustainability Committee to sign the endorsement letter.

#### **5/26 Adoption of the Spelthorne Design Code**

The Committee considered recommending that the Spelthorne Design Code be recommended for adoption by Council. The Spelthorne Design Code had been created in a collaboration between the public, technical stakeholders, and a Task Group consisting of cross-party members. The work was supported by officers in the Strategic Planning team and consultants. The design code aimed to encourage the delivery of sustainable and locally distinctive development across the Borough.

Once adopted, the design code would be promoted by the Council, and planning applicants would be required to complete relevant checklists and reports. The Council could also apply the design code to applications received.

The Committee thanked those involved in the development of the code.

The Committee **resolved** to agree that the Spelthorne Design Code be recommended for adoption at Full Council.

#### **6/26 HMO Supplementary Planning Document Consultation Draft**

The Committee considered the commencement of a statutory consultation on Spelthorne Houses in Multiple Occupation (HMO) Supplementary Planning Document (SPD). An addendum was also provided to the Committee of minor amendments to the document. The SPD sought to address concerns from residents and elected members regarding the location, impact and quality of

HMO proposals. The SPD set out a four-stage approach to assessing all planning applications for new HMOs: a Neighbourhood Impact Assessment, Proximity Impact Assessment, Planning Standards Assessment, and Design Assessment. The thresholds for the assessments had been established following a review of best practice across the country. Unless all four assessments were satisfactorily met, the application would be recommended for refusal.

The Committee acknowledged the consultation would invite comments from residents, developers, and stakeholders on the draft document, and these would be presented to the Committee before a final decision. The Committee were assured that further work was being undertaken to assist residents in reporting any HMOs of concern, and to provide guidance to tenants and landlords about their requirements.

The Committee **resolved** to agree that the Consultation Draft of the Spelthorne Houses in Multiple Occupation (HMO) Supplementary Planning Guidance (SPG) be published for a 4-week public consultation under Regulation 12 of the Town and Country Planning (Local Planning) Regulations 2012.

**7/26 WITHDRAWN - Budgets, Fees and Charges (E & S)**

This item was withdrawn from the agenda.

**8/26 Forward Plan**

The Committee received the forward plan for future Committee business.

The Committee **resolved** to note the forward plan.

**9/26 Exclusion of Public & Press (Exemption Business)**

The public and press did not need to be excluded for the meeting as the remainder of the items on the agenda had been withdrawn.

**10/26 WITHDRAWN - Service Plans - E & S**

This item was withdrawn from the agenda.

**11/26 Neighbourhood Services**

This item was withdrawn from the agenda.

**12/26 Spelthorne Direct Services**

This item was withdrawn from the agenda.

**13/26 Service Plan - Planning Development Management**

This item was withdrawn from the agenda.

**14/26 Strategic Planning**

This item was withdrawn from the agenda.

**Minutes of the Environment and Sustainability Committee  
27 January 2026**

**Present:**

Councillor J.A. Turner (Chair)  
Councillor J.R. Boughtflower (Vice-Chair)

Councillors:

L. Barker	J.P. Caplin	K.M. Grant
M. Bing Dong	D.C. Clarke	H.R.D. Williams
T. Burrell	S.M. Doran	P.N. Woodward
J. Sexton		

**Apologies:** Councillor Beecher

**15/25 Disclosures of Interest**

There were none.

**16/25 Environment & Sustainability Committee - Budget, Fees and Charges and Capital Programme for 26/27**

The Committee considered a report that asked it to:

1. Review the draft detailed revenue budget for 2026/27 for the Environment and Sustainability Committee and agree any amendments,
2. Review the draft detailed Capital Programme budget for 2026/27 for the Environment and Sustainability Committee; and
3. Recommend to the Corporate Policy and Resources Committee to approve the proposed Detailed Revenue Budget and Capital Programme proposals for this Committee.

The Committee asked for officers to provide full details of the benchmarking exercise that had taken place in respect of Outdoor Group Fitness Training Fees.

The Committee requested data with regard to the number of residents using the Garden Waste Service. The Group Head of Neighbourhood Services advise that these figures would be circulated to the Committee.

A recorded vote was requested to consider each recommendation separately.

Recommendation 1:

<b>For</b>	Councillors Turner, Barker, Burrell, Caplin, S Doran, Grant, Sexton, Williams – <b>8 votes</b>
<b>Against</b>	<b>0 votes</b>
<b>Abstain</b>	Councillors Boughtflower, Bing Dong, Clarke, Woodward – <b>4 votes</b>

Recommendation 2:

<b>For</b>	Councillors Turner, Barker, Burrell, Caplin, S Doran, Grant, Sexton, Williams – <b>8 votes</b>
<b>Against</b>	<b>0 votes</b>
<b>Abstain</b>	Councillors Boughtflower, Bing Dong, Clarke, Woodward – <b>4 votes</b>

Recommendation 3:

<b>For</b>	Councillors Turner, Barker, Bing Dong, Burrell, Caplin, S Doran, Grant, Sexton, Williams – <b>9 votes</b>
<b>Against</b>	<b>0 votes</b>
<b>Abstain</b>	Councillors Boughtflower, Clarke, Woodward – <b>3 votes</b>

The Committee **resolved** to:

1. Agree the draft detailed Revenue Budget for 2026/27 for the Environment and Sustainability Committee,
2. Agree the draft detailed Capital Programme Budget for 2026/27 for the Environment and Sustainability Committee; and
1. Recommend to the Corporate Policy and Resources Committee to approve the proposed Detailed Revenue Budget and Capital Programme proposals for this Committee.



**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**

<b>ITEM</b>	<b>Yes / No</b>	<b>Date</b>
Councillor engagement / input from Chair prior to briefing	Yes	11/2/26
Commissioner engagement (if report focused on issues of concern to Commissioners such as Finance, Assets etc)	Yes	23/2/26
Relevant Group Head review	Yes	24/2/26
MAT+ review (to have been circulated <b>at least 5 working days before Stage 2</b> )	Yes	23/2/26
This item is on the Forward Plan for the relevant committee	Yes	4/2/26
	<b>Reviewed by</b>	
Finance comments (circulate to Finance)	<b>Yes</b>	<b>25/2/26</b>
Risk comments (circulate to Lee O’Neil)	<b>LO</b>	<b>02/03/26</b>
Legal comments (circulate to Legal team)	<b>WB</b>	<b>05/03/26</b>
HR comments (if applicable)	<b>N/A</b>	

**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**

<b>ITEM</b>	<b>Completed by</b>	<b>Date</b>
Monitoring Officer commentary – at least <b>5 working days before MAT</b>	<b>L Heron</b>	<b>09/03/26</b>
S151 Officer commentary – at least <b>5 working days before MAT</b>	<b>T.Collier</b>	<b>2/3/2026</b>
Confirm final report cleared by MAT		

# Environment and Sustainability Committee

19 March 2026

<b>Title</b>	Statutory Consultation on Spelthorne Affordable Housing Supplementary Planning Document (SPD) and Climate Change Supplementary Planning Document (SPD)
<b>Purpose of the report</b>	To make a decision
<b>Report Author</b>	Jane Robinson, Local Plans and Infrastructure Manager
<b>Ward(s) Affected</b>	All Wards
<b>Exempt</b>	No
<b>Exemption Reason</b>	N/A
<b>Corporate Priority</b>	Community Addressing Housing Need
<b>Recommendations</b>	<p><b>Committee is asked to:</b></p> <ol style="list-style-type: none"> <li>1. Agree that the consultation draft version of the Spelthorne Affordable Housing Supplementary Planning Document (SPD) be published for a four-week public consultation starting on 8 May 2026, under Regulation 12 of the Town and Country Planning (Local Planning) Regulations 2012.</li> <li>2. Subject to recommendation 1, agree that delegated authority is given to the Deputy Chief Executive in agreement with the Chair of the Environment and Sustainability Committee, to agree any minor revisions to the draft document prior to the consultation.</li> <li>3. Agree that that delegated authority is given to the Deputy Chief Executive in agreement with the Chair of the Environment and Sustainability Committee, to agree the consultation draft version of the updated Climate Change Supplementary Planning Document (SPD) and that this draft be published for a four-week public consultation starting on 8 May 2026, under Regulation 12 of the Town and Country Planning (Local Planning) Regulations 2012.</li> </ol>
<b>Reason for Recommendation</b>	The Affordable Housing Supplementary Planning Document (SPD) has been prepared in collaboration with a cross-party Member Steering group, supported by officers and consultants JJ

	<p>Viability (JJV). The document provides detailed guidance to support the delivery of affordable housing within the borough.</p> <p>The Climate Change Supplementary Planning Document was adopted by the Council on 25 April 2024. Following the adoption of the emerging Local Plan, the SPD will require updating to ensure alignment with the newly adopted policies, after which it must be re-consulted on before being readopted as part of the Spelthorne Local Plan 2024-2039/40.</p> <p>Regulation 12 of the Town and Country Planning (Local Planning) Regulations 2012 requires that a draft Supplementary Planning Document be subject to public consultation for a minimum of four weeks prior to adoption.</p>
--	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

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

What is the situation	Why we want to do something
<ol style="list-style-type: none"> <li>1. Spelthorne Borough Council has been working with consultants JJV to prepare the Affordable Housing Supplementary Planning Document (SPD).</li> <li>2. The government has set a deadline of 30 June 2026 for the adoption of all Supplementary Planning Documents (SPDs). If the Affordable Housing SPD and updated Climate Change SPD are not adopted by this date, they would instead be adopted as non-statutory Technical Guidance, carrying less weight in planning decision making.</li> <li>3. It is not considered good practice to undertake public consultation during the pre-election period, therefore the proposed four-week consultation is scheduled to commence on 8 May 2026, following the West Surrey elections are held on 7 May 2026.</li> <li>4. Once the Local Plan is adopted the Climate Change SPD will be out of date and therefore needs to be updated to “hook on to” the new Local Plan Climate Change policy.</li> </ol>	<ol style="list-style-type: none"> <li>5. The Affordable Housing and updated Climate Change SPDs will provide detailed guidance to support, the effective implementation of the Spelthorne Local Plan 2024-2039/40.</li> <li>6. Once adopted, the SPDs will become a material planning consideration for decision making purposes. They will not introduce new policies or requirements but will assist in the interpretation and application of existing Local Plan policies.</li> <li>7. Under Regulation 12 of the Town and Country Planning (Local Planning) Regulations 2012, a draft Supplementary Planning Document must be subject to a minimum four-week public consultation before it can be adopted.</li> </ol>

This is what we want to do about it	These are the next steps
<p>8. Seek approval from the Committee to initiate the statutory public consultation on the draft Affordable Housing SPD and updated Climate Change SPD, beginning on 8 May 2026.</p>	<p>9. Secure agreement to proceed with two statutory consultations, running from 8 May to 5 June 2026.</p> <p>10. Begin the four- week consultation period using a combination of online, printed materials and public engagement methods.</p> <p>11. Analyse all feedback received and make appropriate revisions to the documents as necessary.</p> <p>12. Present both the updated Affordable Housing SPD and updated Climate Change SPD to Environment and Sustainability Committee, followed by Council, with a recommendation that it be adopted.</p> <p>13. Once adopted the Affordable Housing SPD and updated Climate Change SPD will be used as material considerations in planning decision making.</p>

## 2. Key issues

### Background

- 2.1 This report seeks approval to commence the statutory four-week consultation on the Affordable Housing Supplementary Planning Document (appendix A) and the updated Climate Change Supplementary Planning Document (SPDs).
- 2.2 The Supplementary Planning Documents (SPDs) provide further guidance to support the implementation of Spelthorne Borough Council's Local Plan 2024 - 2039/40. They will also assist the Council's Local Plan Immediate Review which is planned to be submitted within two years of adoption of the emerging Plan.
- 2.3 Once adopted, the SPDs will be a material planning consideration for decision making purposes. They do not introduce new policies or requirements, instead they assist in the interpretation and application of existing Local Plan policies, and particularly those that relate to affordable housing and climate change, including:
- H1: Homes for All.
  - H2: Affordable Housing.
  - PS1: Responding to the Climate Emergency

### **Affordable Housing Supplementary Planning Document (SPD)**

- 2.4 The Affordable Housing SPD (appendix A) reviews key aspects of national policy, guidance, and Local Plan requirements relating to the provision of affordable housing. It draws on up-to-date evidence of housing need in Spelthorne, including the forthcoming Housing and Economic Development Needs Assessment (HEDNA) 2026, the Council's Housing Register and evidence prepared for the Local Plan, such as the Strategic Housing Market Assessment (SHMA).
- 2.5 This SPD provides guidance on delivering affordable housing across different site and development types. This includes thresholds, tenure mix, dwelling types, sizes, and standards. It also addresses design and integration, engagement with Registered Providers (RPs), grant funding, viability assessments, financial contributions in lieu of on-site affordable housing, and the use of Viability Review Mechanisms.
- 2.6 The draft SPD sets out guidance on the following key matters relating to affordable housing delivery:
- **Thresholds:** The circumstances where a requirement to provide affordable housing arises.
  - **Tenure Mix:** The types of affordable housing that the Council prefers to be delivered.
  - **Bedroom Size Mix:** The proportion of unit size (by bedroom) required for the affordable tenures preferred.
  - **Approach to 'Other Residential Development Types'** including Build to Rent, specialist accommodation, self and custom build housing, community led development, rural exception sites.
  - **Application Procedure and Engagement:** This includes encouraging early engagement with the Council and RPs, varying affordable housing obligations and the Vacant Building Credit.

#### What Affordable Housing Tenures should the guidance advise?

- 2.7 The draft SPD proposes that 75% of affordable homes should be provided as Social/Affordable Rent, with a preference for Social Rent. The remaining 25% should be delivered as either Shared Ownership or Intermediate Rent homes, with a preference for Intermediate Rent.
- 2.8 Potential alternative approaches to include:
- Revising the 75%/25% split between Social Rent/Affordable Rent and Intermediate homes.  
Expressing a preference for different affordable housing products, for example Shared Ownership instead of Intermediate Rent or prioritising First Homes within the intermediate tenure.

#### What Bedroom Size Mix should the guidance describe?

2.9 The draft SPD advises the following Bedroom Size Mix for affordable housing on sites with multiple units:

Affordable Housing Bedroom Size Mix				
	1 bed	2 bed	3 bed	4 bed
<b>Low Cost Rent:</b>				
<ul style="list-style-type: none"> <li>• Social Rent</li> <li>• Affordable Rent</li> </ul>	35-40%	25-30%	25-30%	5-10%
<b>Intermediate</b>	15-25%	40-45%	25-35%	5-10%

2.10 Potential alternatives include amending these ratios, such as increasing the proportion of family sized housing. However the proposed mix aligns with the recommendations in the SHMA and Low Cost Rent mix aligns with an analysis of the Housing Register and has been used in the Local Plan Viability Study.

Eligibility and Affordability Criteria for Intermediate Housing

2.11 The draft SPD proposes the following income eligibility criteria:

- With respect to Intermediate Rent:
  - Households with a gross income of up to £65,000 will be eligible for Intermediate Rent.
  - Total housing costs including rents and service charges for Intermediate Rent should not exceed the lower of the relevant LHA for the relevant size of property and 80% of the market rent for an equivalent property.
- With respect to Intermediate Ownership:
  - Households with a gross income of up to £65,000 will be eligible for Intermediate Rent.
  - Total housing costs, including equity purchases and rent on the unsold equity should not exceed 40% of net income for the maximum household income (£80,000).

Vacant Building Credit (“VBC”)

2.12 The draft SPD explains how VBC will be applied in Spelthorne and sets out conditions that would apply where it is used. It also confirms that VBC will only apply in Spelthorne where required by national policy.

**Financial Contributions in Lieu of On-site Affordable Housing**

2.13 The draft SPD sets out:

- Circumstances where the Council may agree that on-site or off-site provision is not feasible.
- The methodology that will be used to determine the level of financial contribution.
- How these financial contributions will be spent by the Council.

2.14 In terms of overarching context, the Local Plan states the following with respect to financial contributions in lieu of on-site affordable housing:

*H2(2)(b)(ii) 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.*

*6.36 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.*

#### Overarching Approach to Calculating the Level of Financial Contribution

2.15 A number of different approaches were considered by the Steering group and that the recommended one which is:

An approach which subtracts the Gross Development Value of the scheme assuming on-site affordable housing is provided, as well as an allowance for an additional Community Infrastructure Levy liability and marketing costs, from the GDV of the scheme assuming no affordable housing is provided on-site (i.e. assuming 100% market tenure housing).

#### Viability Review Mechanisms

2.16 The draft SPD sets out:

- Key principles for Viability Review Mechanisms.
- Matters to be included in Section 106 Agreement.
- The methodology proposed for use in Spelthorne.
- How viability deficits will be treated within the review process.

2.17 Key issues to be addressed include:

- Issue 1: Whether to use a formula-based approach or full reassessment.
- Issue 2: Thresholds for Mid-Stage Reviews.
- Issue 3: Whether Early-Stage Reviews apply only where development has not been progressed within a set timescale.
- Issue 4: Whether review mechanisms should reflect viability deficits identified at application stage.

2.18 Relevant Local Plan policies state:

H2(2)(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.*

6.34 (Supporting text) *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.*

Issue 1: The methodology to be used (formula based or a full reassessment)

- 2.19 This issue concerns whether review mechanisms should be formula based or should involve full viability reappraisals similar to those undertaken at application stage.

Issue 2: Specific scheme size thresholds where Mid-Stage Reviews apply

- 2.20 The Local Plan states that Mid-Stage Reviews should apply “in the case of longer phased schemes”. This issue relates to whether the drafting should confirm the scale of the scheme (by unit) where Mid-Stage Reviews are required. The draft SPD proposes:

*More than one Mid-Stage Review may be required depending on the size of the scheme and the number of phases, plots or buildings. It is generally appropriate for schemes proposing 500 to 1,000 homes to be subject to one Mid-Stage Review, whereas schemes of 1,000 homes should generally be subject to at least two of these reviews.*

Issue 3: Whether Early-Stage Reviews should only apply where a scheme has not been progressed within a specified timescale

- 2.21 This issue considers whether Early-Stage Reviews should only apply if a scheme has not progressed to a certain stage (for example site preparation and construction to ground floor slab) within a certain time period (e.g. 24 months). The draft SPD reflects this approach.

Issue 4: Whether the approach should account for viability deficits

- 2.22 This issue relates to whether viability deficits identified at application stage should be reflected in viability review mechanisms, i.e. a surplus greater than the extent of an agreed deficit would need to be identified before an additional contribution to affordable housing is identified.

**Climate Change Supplementary Planning Document (SPD)**

- 2.23 The Council adopted the Climate Change Supplementary Planning Document (SPD) at its meeting on 25 April 2024. The Climate Change SPD encourages the delivery of more sustainable design for future developments within Spelthorne and supports the implementation of climate change policies within the Core Strategy. It was intentionally drafted to be easily updated, enabling it to be re-adopted, following further public consultation, once the Local Plan is in place.
- 2.24 It has always been the intention that, once the Local Plan is adopted by the Council, the Climate Change SPD will be updated to align with and “hook onto” the new climate change policy within the new Local Plan. This will ensure the SPD continues to be used in determining planning applications and that its requirements remain enforceable.
- 2.25 The newly introduced government deadline of 30 June 2026 has meant the acceleration of the timetable to update the Climate Change SPD. The current document is attached as appendix D. The report requests delegated authority is given to the Deputy Chief Executive in conjunction with the Chair of the Environment and Sustainability Committee to approve the necessary updates to the document ahead of the public consultation. The final versions will be brought back to Environment and Sustainability Committee and Council for consideration and adoption.
- 2.26 A working group comprising of the Climate Change officer, Strategic Planning officers, Development Management Planning officers, Sustainability officer, Building Control manager, Biodiversity officer, Principal Pollution Control officer, and Group Head for Commissioning and Transformation developed the specification for the SPD. Following a competitive procurement process David Lock Associates were appointed to prepare the Climate Change SPD and worked closely with officers to produce the document for consultation.
- 2.27 The SPD provides detailed guidance on the following themes:
- Energy use - including the energy hierarchy and renewable energy systems
  - Water - including sustainable drainage systems, managing flood risk and greywater use
  - Building design - including orientation and layout to maximise potential for renewable energy generation and avoid the impacts of climate change
  - Transport - including walkable and low car neighbourhoods
  - Green Infrastructure – including planting species selected for climate resilience
  - Materials and construction – including reduction of embodied carbon lean design and sustainable material choice
- 2.28 The SPD contains 3 checklists one for householder applications, one for minor applications and one for major applications. Applicants must complete the relevant checklist as part of their planning submission to clearly demonstrate how they have addressed the climate change mitigation measures set out in the SPD.

- 2.29 Public consultation on the SPD took place between 18 September 2023 and 16 October 2023. Consultation materials were published on the Council website and made available for the public to view at local libraries and the civic centre during office hours.
- 2.30 The Environment and Sustainability Committee report of 27 February 2024 is attached as a background document. This committee considered a report on the adoption of the Climate Change Supplementary Planning Document (SPD) including the consultation responses. The Committee resolved to approve the Climate Change Supplementary Planning Document and recommend to Council for adoption.
- 2.31 The Climate Change SPD will be updated by David Lock Associates (DLA) and approved by the Deputy Chief Executive and Chair of Environment and Sustainability Committee. It will then undergo the four-week public consultation and then be brought back to Environment and Sustainability Committee and Council for re-adoption under the new Local Plan. It will be linked to policy “PS1: Responding to the Climate Emergency”, ensuring that it continues to be used in determining planning applications and that its standards remain effective and enforceable.

### **Statutory Public Consultation and adoption**

- 2.32 The purpose of this report is to seek approval to undertake two four-week statutory consultations one on the Affordable Housing SPD and one on the updated Climate Change SPD, to run from 8 May to 5 June 2026. Statutory Consultation Strategies for both documents are set out in appendices B and E of the report. Following the consultation officers and consultants will review and analyse all feedback received and make any necessary revisions. Both the updated SPDs will then be presented to the Environment and Sustainability Committee, with a recommendation to adopt, followed by Council. Upon approval, the Affordable Housing SPD and Climate Change SPD will form part of the Council’s policy framework and will be used as material considerations in planning decision making.

## **3. Options appraisal and proposal**

- 3.1 **Option 1 – Preferred option:** That the Committee approves the three recommendations and the commencement of the four-week public consultation on both the Affordable Housing and updated Climate Change SPD documents running from 8 May to 5 June 2026.
- 3.2 **Option 2 – Not Recommended:** That the Committee seeks amendments to the Affordable Housing SPD and requests to see the updated Climate Change SPD documents prior to commencing the public consultation.

This option is not recommended, as it is not good practice that matters such as this are debated at Committee during pre-election period. Failure to agree the SPDs for consultation would prevent the consultation from commencing on 8 May 2026, creating delay that makes it unachievable to meet the Government’s adoption deadline of 30 June 2026. After this date, it is likely that the SPDs will no longer be capable of being adopted, meaning the

documents would instead only be issued as non-statutory guidance with reduced weight.

- 3.3 **Option 3 – Not Recommended:** That the Committee does not approve the request to undertake statutory consultation on the Affordable Housing SPD and Climate Change SPD.

This option is not recommended, as a statutory public consultation is a legal requirement for adopting a SPD. Without completing this process, the Affordable Housing SPD and Climate Change SPD cannot progress and will not be able to be adopted as a statutory document or used as a material planning consideration in decision making.

#### 4. Risk implications

- 4.1 A risk register is used in projects to document, assess, and manage potential risks that could impact the project's success, ensuring proactive mitigation and response strategies. The risk register for the project is regularly monitored and updated by the Project Manager.
- 4.2 Failure to proceed with the statutory public consultation for Affordable Housing SPD and climate change SPD may result in significant reputational damage to the Council, undermining its commitment to community engagement, transparency, and proactive planning.
- 4.3 The Council has already invested considerable financial and staff resources in the development of both the Affordable Housing SPD and Climate Change SPD. Not progressing with the public consultation would render this work ineffective, resulting in wasted expenditure without achieving the intended outcomes and delay the implementation of essential planning guidance.
- 4.4 Without the progression of the adoption of the Affordable Housing SPD and Climate Change SPD, the Council will be less equipped to take a consistent and proactive approach to affordable housing delivery and climate change mitigation. This may lead to inconsistent planning outcomes and a missed opportunities to secure appropriate affordable housing across the Borough.
- 4.5 If the public consultation does not commence on 8 May 2026, the Council will not be able to adopt the SPDs by the Government's deadline of 30 June 2026. If this deadline is missed, there are only two possible alternatives, both of which present significant risks:
- The SPDs would become non-statutory technical guidance, carrying substantially less weight in planning decision making. This would reduce the Council's ability to secure affordable housing and climate resilient development consistently across the Borough.
  - The SPDs would need to be progressed as a Supplementary Plan, a process for which detailed secondary legislation and procedural requirements have not yet been published. This represents a significant risk, as meeting these requirements is likely to require additional resources, time, and cost, particularly as Supplementary Plans will need to be taken through an examination.

## **5. Financial implications**

- 5.1 The fee for JJ Viability (JJV) for producing the Affordable Housing SPD is £41,280. JJV were appointed following a competitive tendering process undertaken with support and guidance from the Council Procurement team. The cost will be split across financial years, with 50% incurred in this financial year, and 50% in 2026/27.
- 5.2 If the statutory public consultation does not commence on 8 May 2026, the Council will be unable to adopt the SPDs before the Government's deadline of 30 June 2026. After this date, two alternative outcomes exist: The document would be a non-statutory technical note, which would carry less weight in planning decisions or as a Supplementary Plan, a process expected to involve greater cost and resource demands.
- 5.3 The cost for David Lock Associates to update the Climate Change Supplementary Planning Document was originally quoted at £6,094 however costs may have risen since the work was quoted in 2024. The £6,094 plus a contingency is already incorporated in existing budget as the update was planned.

## **6. Legal comments**

- 6.1 Without the SPD in place limits the Council's ability to insist on certain aspects of affordable housing required. It may also increase socio economic inequalities as the Council have no clear strategy for dealing with developers on affordable housing requirements that suit the assessed needs of the local community. The consultation process of adopting a SPD enable the community to have they say on their particular needs and requirements that have are then potentially encapsulated within the SPD.

## **Corporate implications**

### **7. S151 Officer comments**

- 7.1 Affordable housing provision is a key issue for the Borough both in terms of addressing the housing need of residents but equally insufficient supply of affordable housing impacts on the ability of the Council to place households off its register and ease pressures on its Temporary Accommodation which has a significant ongoing revenue budget. The S151 Officer confirms that all direct financial implications relating to the report proposal have been taken into account and that the recommendations are fully funded from within the current and 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 There are no procurement implications arising directly from this report, but it should be noted that the appointment of the consultants is compliant with the relevant rules and regulations including the Council's Contract Standing Orders.

## **10. Equality and Diversity**

- 10.1 An Equalities Impact Assessment (EIA) has been completed for the Affordable Housing SPD. It is attached at appendix C.

## **11. Sustainability/Climate Change Implications**

- 11.1 Updating and consulting on the Climate Change SPD ensures the council can continue to apply clear guidance to support low- carbon development, energy efficiency, sustainable design, and climate- resilient infrastructure. Proceeding with consultation before the June 2026 deadline protects the SPD's planning weight, helping secure consistent delivery of the borough's climate objectives.
- 11.2 The Affordable Housing SPD should connect with the Climate Change SPD to provide clarity on delivering high-quality affordable housing that reduces energy bills and is resilient to the future risks of climate change.

## **12. Other considerations**

- 12.1 It is not good practice to hold a public consultation during the pre-election period which is likely to start on 23 March 2026 with West Surrey Council elections due to take place on the 7 May 2026. The four-week consultation will begin on 8 May and run to 5 June.
- 12.2 The government has a set deadline of 30 June 2026 by which all new SPDs need to be adopted. This means an incredibly tight timeline for consultation responses to be analysed and then to hold an extraordinary meeting of the Environment and Sustainability Committee to consider the adoption of the documents and for a Council meeting to adopt them. To address this an expedited delivery programme has been provided by consultants JJV and David Lock Associates.
- 12.3 If it is not possible to meet this deadline, both documents can be delivered as non-statutory technical guidance after 30 June 2026.

## **13. Timetable for implementation**

- 13.1 If agreed, the two statutory consultations would begin on 8 May, the day after the West Surrey elections are held. They will run for four-weeks until 5 June 2026. The SPDs will need to be adopted by 30 June 2026.

## **14. Contact**

14.1 Jane Robinson; 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:**

[Environment and Sustainability Committee report - 27 February 2024 – Climate Change Supplementary Planning Document](#)

**Appendices:**

Appendix A: Spelthorne Affordable Housing SPD - Final Draft for Consultation - March 2026

Appendix B: Affordable Housing SPD – Statutory Consultation Strategy

Appendix C: Affordable Housing SPD - Equalities Impact Assessment (EIA)

Appendix D: Climate Change SPD 2024

Appendix E: Climate Change SPD – Statutory Consultation Strategy

**Affordable Housing**

**Supplementary Planning Document**

**Consultation Draft**

**May 2026**



## Contents

List of Acronyms .....	3
Executive Summary .....	4
1. Introduction .....	5
2. Context: National and Local Policy .....	6
3. Context: The Need for Affordable Housing in Spelthorne .....	13
4. Affordable Housing Delivery .....	19
5. Application Procedure and Engagement .....	28
6. Financial Contributions in Lieu of On-site Affordable Housing .....	32
7. Viability Assessment .....	36
8. Viability Review Mechanisms .....	46
9. Glossary .....	57
10. Appendix A: Financial Contributions in Lieu of On-site Affordable Housing – Worked Examples .....	63
11. Appendix B: Viability Review Mechanisms – Worked Example.....	67

## **List of Acronyms**

**AUV – Alternative Use Value**

**BLV – Benchmark Land Value**

**CIL – Community Infrastructure Levy**

**EUV – Existing Use Value**

**FVA – Financial Viability Assessment**

**GDV – Gross Development Value**

**HEDNA – Housing and Economic Development Needs Assessment**

**IRR – Internal Rate of Return**

**LHA – Local Housing Allowance**

**LPA – Local Planning Authority**

**LPIR – Local Plan Immediate Review**

**MHCLG – Ministry of Housing, Communities and Local Government**

**NDSS – Nationally Described Space Standards**

**NDV – Net Development Value**

**NPPF – National Planning Policy Framework**

**ONS – Office for National Statistics**

**RICS – Royal Institution of Chartered Surveyors**

**RLV – Residual Land Value**

**RP – Registered Provider**

**SAHP – Social and Affordable Homes Programme (2026–36)**

**SHMA – Strategic Housing Market Assessment**

**SPD – Supplementary Planning Document**

**S106 – Section 106**

**VBC – Vacant Building Credit**

## **Executive Summary**

1. This Supplementary Planning Document (“SPD”) provides additional guidance to support the implementation of Spelthorne Borough Council’s (“the Council”) Local Plan.
2. This SPD is a material consideration in the planning decision making process. It provides guidance that the Council, as the Local Planning Authority (“LPA”), shall apply in evaluating planning applications that attract a policy requirement to provide affordable housing. Guidance is provided on the following matters:
  - When affordable housing is required to be provided and the different thresholds that apply.
  - What tenure mix, dwelling types, sizes, and standards are expected.
  - How affordable housing should be designed and integrated into developments.
  - How applicants should work with Registered Providers of affordable housing and make use of grant funding.
  - Forming and considering viability assessments.
  - When and how financial contributions may be accepted instead of on-site affordable housing provision.
  - How Viability Review Mechanisms will be used.
3. The purpose of this SPD is to provide greater clarity to applicants, developers and third parties, including members of the public, and should be read alongside the Local Plan and the Council’s other associated planning guidance.
4. This SPD contains a level of technical detail necessary to provide clear, robust guidance for applicants, developers, and decision-makers. Where specialist concepts or terminology are required, the Council has sought to explain these as clearly as possible and to structure the document in a way that is accessible to a wide audience. A list of acronyms used, as well as a glossary, is provided to assist the reader.

## **1. Introduction**

- 1.1 This Supplementary Planning Document (“SPD”) provides additional guidance to support the implementation of Spelthorne Borough Council’s (“the Council”) Local Plan 2024–2039/40. It will also inform and assist the Council’s Local Plan Immediate Review (“LPIR”), which is planned for submission within two years of adoption of the emerging Local Plan. The LPIR will set out proposals for the use of land, along with policies to guide future development and deliver sustainable growth up to at least 2045. This SPD will be updated prior to its adoption to reflect the status of the Local Plan at that time, including its adoption date.
- 1.2 This SPD is a material consideration in the planning decision making process. It provides guidance to support the interpretation and application of existing Local Plan policies, particularly those relating to affordable housing, including:
- H1: Homes for All.
  - H2: Affordable Housing.
- 1.3 The SPD reviews the key aspects of national policy, guidance, and the Local Plan relating to the provision of affordable housing. It draws on up to date evidence of housing need in Spelthorne as set out in the emerging Housing and Economic Development Needs Assessment (“HEDNA”) 2026 and from the Council’s Housing Register. It also draws upon evidence prepared to support the newly adopted Local Plan, such as its Strategic Housing Market Assessment (“SHMA”).
- 1.4 This SPD provides guidance on affordable housing delivery on different site and development types, covering thresholds, tenure mix, and dwelling types, sizes, and standards. It also addresses affordable housing design and integration, engagement with Registered Providers (“RP”) and grant funding, and provides guidance on viability assessment, financial contributions in lieu of on-site affordable housing, and Viability Review Mechanisms.
- 1.5 The Council acknowledges the current viability and deliverability challenges affecting residential development, including ongoing difficulties—at the time of writing—in securing Registered Providers to purchase on-site affordable housing, as well as government measures to address this. The Council remains committed to considering development proposals positively and pragmatically, and to working with applicants and developers to deliver sustainable development in Spelthorne.

### **How to use this SPD**

- 1.6 This SPD provides detailed guidance to support the implementation of Policies H1 and H2 of the Local Plan. Summary tables are included to aid interpretation; however, the detailed provisions of this SPD and the Local Plan policies take precedence. This document should be read alongside the Local Plan, relevant national policy, and other Council guidance and evidence.

## **2. Context: National and Local Policy**

### **National Planning Policy Framework 2024**

- 2.1 The National Planning Policy Framework (“NPPF”) 2024 sets out national policy relating to affordable housing and developer contributions. It states that strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for homes, including affordable housing.
- 2.2 Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure. Such policies should not undermine the deliverability of the plan.
- 2.3 Paragraph 59 states that where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force. All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning practice guidance, including standardised inputs, and should be made publicly available.
- 2.4 Paragraph 63 states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes. The NPPF places particular emphasis on meeting the needs of households requiring Social Rent, and this SPD reflects that national direction.
- 2.5 Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required (including the minimum proportion of Social Rent homes required), and expect it to be met on-site unless:
- a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and
  - b) the agreed approach contributes to the objective of creating mixed and balanced communities.
- 2.6 Paragraph 66 states that where major development involving the provision of housing is proposed, planning policies and decisions should expect that the mix of affordable housing required meets identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures. The previous requirement under national policy to deliver 25% of affordable housing as First Homes has been removed. Authorities may still support First Homes locally where evidence shows they meet identified needs, but they are no longer a national requirement.

- 2.7 Paragraph 67 states that as part of the ‘Golden Rules’ for Green Belt development set out in paragraphs 156-157 of the NPPF, a specific affordable housing requirement (or requirements) should be set for major development involving the provision of housing, either on land which is proposed to be released from the Green Belt or which may be permitted on land within the Green Belt. This requirement should:
- a) be set at a higher level than that which would otherwise apply to land which is not within or proposed to be released from the Green Belt; and
  - b) require at least 50% of the housing to be affordable, unless this would make the development of these sites unviable (when tested in accordance with national planning practice guidance on viability).
- 2.8 The affordable housing requirement for land within or released from the Green Belt may be set as a single rate or be set at differential rates, subject to the criteria above.
- 2.9 Paragraph 157 states that, until development plan policies for affordable housing are updated, the affordable housing contribution required to satisfy the Golden Rules is 15 percentage points above the highest existing affordable housing requirement that would otherwise apply to the development, subject to a maximum cap of 50%.<sup>1</sup> Where no existing affordable housing requirement is in place, a default contribution of 50% should apply.
- 2.10 The use of site specific viability assessments for land within, or released from, the Green Belt must follow the approach set out in national planning practice guidance on viability. This guidance confirms that, where development is subject to the NPPF Golden Rules, site specific viability assessments should not be used to reduce developer contributions, including affordable housing.
- 2.11 Paragraph 71 states that mixed tenure sites can provide a range of benefits, including creating diverse communities and supporting timely build out rates, and local planning authorities should support their development through their policies and decisions (although this should not preclude schemes that are mainly, or entirely, for Social Rent or other affordable housing tenures from being supported). Mixed tenure sites can include a mixture of ownership and rental tenures, including Social Rent, other rented affordable housing and build to rent, as well as housing designed for specific groups such as older people’s housing and student accommodation, and plots sold for custom or self-build.

**Draft National Planning Policy Framework 2025**

- 2.12 In December 2025, the government published consultation stage revisions to the NPPF. These draft policies were subject to consultation at the time that this SPD was developed. The draft NPPF sets out plan making and development management policies, as well as thematic policies, including those relating to sustainable development, delivering homes and supporting growth.

---

<sup>1</sup> The 50% cap does not apply to rural exception sites or community-led development exception sites, or if the local planning authority has a relevant existing policy which would apply to the development which is above 50%.

- 2.13 The consultation document accompanying this restates the government's manifesto commitment to strengthen the existing developer contributions system and to deliver the biggest boost to social and affordable housing in a generation.
- 2.14 The Draft NPPF carries forward a range of policy approaches relating to affordable housing and viability from the 2024 NPPF, which are not repeated here. Other significant policies are summarised below.
- 2.15 Draft NPPF policy PM12 states that policy requirements for affordable housing and developer contributions should be clear so that they can be accurately accounted for in the price paid for land.
- 2.16 Plans should also set out the circumstances in which review mechanisms will be used for development proposals where contributions are proposed to be reduced below the requirements set out in plan policies. Plans should clearly set out the processes and terms of engagement regarding how and when viability will be reassessed over the lifetime of the development to maximise policy compliance.
- 2.17 Draft NPPF policy DM5 states that there may be limited circumstances in which it would not be possible for development to proceed on a policy compliant basis, and a viability assessment to inform decision-making is justified to ensure that a proposed development makes the maximum possible contribution to affordable housing and other infrastructure. Such circumstances may include situations where:
- a) The development is significantly different from any typology assumed in the development plan viability assessment.
  - b) Site characteristics differ substantially from the assumptions used to assess viability when the relevant development plan policies were prepared.
  - c) The development is demonstrably burdened by costs which were unforeseeable when the development plan was prepared; and/or
  - d) Site or economic circumstances have changed significantly since the development plan was prepared.
- 2.18 Neither the price paid for land, nor the price intended to be paid through an option agreement, should be a justification for failing to accord with relevant policies in the plan.
- 2.19 Where a viability assessment is submitted with a development proposal, this should be based upon and refer back to the viability assessment(s) that informed the relevant development plan policies. It should fully evidence all inputs and assumptions used in the assessment, and explain any differences from those used for viability assessment that informed the relevant plan policies. All viability assessments should reflect the recommended approach in planning practice guidance, use standardised inputs, and should be made publicly available.
- 2.20 These considerations should inform the decision maker's assessment of the weight to be given to a submitted viability assessment. Where a viability assessment is submitted and contributions are reduced below the requirements set out in relevant development plan policies, decision makers should consider using review mechanisms to seek policy compliance over the lifetime of the project, in accordance with planning practice guidance.

- 2.21 Policy HO5 states that the development plan should set out policies to address the housing needs of different groups. As well as the type and mix of affordable housing, including the minimum proportion of Social Rent, this includes requirements for accessible housing, setting out the proportion of new housing that should be delivered to requirement M4(2) Accessible and adaptable dwellings and M4(3) Wheelchair user dwellings of the Building Regulations. M4(2) requirements should reflect local levels of need, and plans should ensure that at least 40% of new housing delivered over the course of the plan is delivered to M4(2) or M4(3) standards.<sup>2</sup>
- 2.22 The consultation document accompanying the draft NPPF indicates that government is reviewing whether the planning system provides appropriate flexibility to support temporary accommodation affordable housing products, such as stepping stone housing, when considering matters such as space standards.
- 2.23 As part of the Draft NPPF, government is also consulting on further issues relating to viability assessment, including growth testing, developer return, Benchmark Land Values and cross-checking the outputs of viability assessments.
- 2.24 DM policy HO8 requires development proposals to meet or exceed plan requirements for the proportion and mix of affordable housing tenures relevant to the location, including the minimum proportion of Social Rent. This should be provided onsite unless:
- a) Off-site delivery on an alternative nearby site would optimise the quality or quantity of homes built; or
  - b) A cash payment in lieu of on or off-site provision can be justified robustly, and the agreed approach contributes towards the objective of creating mixed and balanced communities.
- 2.25 DM policy HO10 states that development proposals for housing or traveller sites on land not already allocated for this purpose, and which are located outside settlements, should be supported where they are:
- a) A rural exception site that will provide affordable housing or affordable traveller sites to meet identified local needs – as evidenced through a local housing needs survey or secondary data which is no more than five years old; or
  - b) Sites which comprise community-led development which would not qualify as a rural exception site, but which include one or more types of affordable housing.
- 2.26 Unless otherwise specified in the development plan, exception sites brought forward in one of these two ways should:
- a) Adjoin or be physically well-related to settlements.
  - b) Be no larger than 1 hectare in size, or exceed 5% of the size of the existing settlement; and
  - c) Comprise a majority of affordable housing or affordable traveller pitches. A proportion of market tenure homes may be allowed on the site where essential to enable the delivery of affordable units without grant funding.

---

<sup>2</sup> The Draft NPPF also refers to the provision of military affordable housing which can be provided alongside or instead of normal tenure requirements where provided onsite and there is a demonstrated unmet need.

- 2.27 Policy GB8:3 states that there are only three circumstances in which a site-specific viability assessment may be justified to allow the contributions expected under the Green Belt golden rules to be adjusted, which are where a development proposal is:
- a) On previously developed land.
  - b) For a multi-phase strategic site; or
  - c) A development model which is of a wholly different type to that assumed in the viability assessment that informed the development plan.
- 2.28 Where the circumstances above apply, development should still make the maximum possible contribution to affordable housing and other infrastructure requirements.
- 2.29 The NPPF consultation document also states that, as a general rule, attempts to revisit fundamental issues of viability or planning obligations through Section 73 applications should be scrutinised carefully, and the applicant should provide a robust justification for any changes proposed for planning obligations associated with the original permission beyond those linked to the specific variation of condition being sought. Where developers submit a Section 73 application that seeks to reduce affordable housing provision based on a new viability assessment, the decision-maker should have regard to the harm that such a reduction may cause and give this appropriate weight in the overall planning balance, alongside the wider merits of the scheme. The government has also written to the Planning Inspectorate, Councils and the development sector on this basis.

### **Spelthorne Local Plan**

- 2.30 The Spelthorne Local Plan was adopted in 2026. This sets out policies relating to the provision of housing and affordable housing in Spelthorne.

#### **Policy H1: Homes for All**

- 2.31 Policy H1 states that the Council will make provision for at least an additional 618 homes per annum in Spelthorne over the plan period.
- 2.32 New residential development is required to deliver a wide choice of homes to meet a range of accommodation needs, providing a mix of housing tenures, types and sizes appropriate to the size, characteristics and location. 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 SHMA or any similar evidence for market and affordable units.
- 2.33 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”).
- 2.34 Further aspects of Local Plan policy relating to accessible and supporting housing are considered in Affordable Housing Delivery section.

#### **Policy H2: Affordable Housing**

- 2.35 Policy H2 states that 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.

- 2.36 Planning permission will be granted provided that satisfactory arrangements have been made to secure affordable housing as determined by the principles set out below.

#### Size, Type and Tenure

- 2.37 The tenure split should be informed by the most up to date Council evidence. The sizes, types and tenure of homes provided will be determined on the basis of local needs as identified in having regard to the SHMA. This specified a tenure split of 75% Affordable/Social Rent, with 25% Intermediate housing. Modifications to the policy have removed the reference to a 25% requirement to provide First Homes which is no longer in national policy. The policy also referred to the national policy requirement to provide a minimum of 10% affordable home ownership, however this also no longer forms part of the NPPF and government is currently consulting on introducing a minimum requirement for the provision of Social Rent.
- 2.38 This SPD retains a 75% Social/ Affordable Rent: 25% Intermediate tenure split. This reflects the substantial need for Social/Affordable Rent homes as evidenced by the SHMA, HEDNA and Housing Register, and aligns with national policy emphasis on delivering Social Rent where possible.

#### Onsite / Off-site Provision and Viability

- 2.39 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. 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 financial contribution.
  - 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.

#### Assessing the Site as a Whole

- 2.40 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.

#### Build to Rent

- 2.41 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.

Integration

- 2.42 Where provided within a market housing scheme, affordable housing will be well integrated with and appropriately designed to complement the market tenure 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.

Applications where Affordable Housing Requirements Apply

- 2.43 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.

Viability Reviews Mechanisms

- 2.44 Viability Reviews 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.

**Local Plan Immediate Review**

- 2.45 The Council has also committed to undertaking an LPIR, with the next Local Plan to be submitted within two years of adoption of the emerging plan. The LPIR will set out proposals for the use of land and policies to guide future development and deliver sustainable growth up to at least 2045.
- 2.46 This SPD will support the implementation of the adopted Local Plan and inform the LPIR by providing updated guidance on affordable housing delivery and viability.

### **3. Context: The Need for Affordable Housing in Spelthorne**

- 3.1 Local Plan Policy H2 requires that affordable housing provision, including the sizes, types and tenure of homes, is determined based on up to date evidence of need. This evidence includes the SHMA, the HEDNA and the Council's Housing Register. This section summarises the key indicators of need that underpin the Council's preferred approaches to affordable housing.

#### **Strategic Housing Market Assessment**

- 3.2 This SPD uses the term "Low Cost Rent" (rather than "Affordable Rent" as referred to in the SHMA) to describe affordable housing provided for households with low incomes in greatest housing need. This comprises of Social Rent and Affordable Rent which is allocated to households on the Council's Housing Register. This umbrella term is used for simplicity in this SPD, but does not replace national terminology. It reflects national policy emphasis on delivering Social Rent and Affordable Rent for households on the Housing Register and aligns with the Social and Affordable Homes Programme 2026–36. Separate terminology is used for other tenures including Intermediate Rent. Further details are set out in the glossary.
- 3.3 A SHMA was undertaken in 2015 and an update to this was published in 2019. This identified a net annual requirement for 459 Low Cost Rent units over the period to 2035, taking into account re-let supply,. This evidence supports the continued prioritisation of Social Rent and Affordable Rent delivery in Spelthorne.
- 3.4 While not a like for like comparison, Low Cost Rent accounted for more than three quarters of overall housing need, and so the assessment recommended that the Council should continue to seek as much affordable housing as viably possible when setting affordable housing policies.
- 3.5 The assessment recognised that when considering tenure mix there are trade-offs between the affordability of accommodation and the number of homes that can viably be provided. To inform this it suggested that 30% of homes within a scheme are provided as Social / Affordable Rent, and 10% as affordable home ownership. This aligns directly with the 75% Low Cost Rent : 25% Intermediate tenure split embedded in Local Plan Policy H2.
- 3.6 The assessment also noted that the cost of affordable home ownership properties can sometimes exceed those of lower cost market tenure homes and thus cannot truly be considered as affordable. This highlights the need to ensure that home ownership products are only supported where they demonstrably meet local income levels and affordability thresholds.
- 3.7 The net need for affordable home ownership was estimated at 29 to 384 units per annum. The evidence suggested that there is no basis to increase the provision of affordable home ownership above the 10% minimum requirement set out in the NPPF at that time, and that the Council should be seeking to provide Social and Affordable Rent housing. The NPPF minimum 10% home ownership requirement has since been removed from the NPPF which now places much greater emphasis on the provision of Social Rent. Shared Ownership was identified as the most appropriate affordable home ownership product for any that is provided. The SHMA did not assess the need for Intermediate Rent housing, however, this considered further below.

3.8 The following bedroom size mix for affordable housing was recommended:

<u>Table 1: SHMA Update Recommended Bedroom Size Mix</u>				
	<b>1 bed</b>	<b>2 bed</b>	<b>3 bed</b>	<b>4 bed</b>
<b>Low Cost Rent</b>	35-40%	25-30%	25-30%	5-10%
<b>Affordable Home Ownership</b>	15-25%	40-45%	25-35%	5-10%

3.9 The study recognised the role that delivery of larger family homes can play in releasing supply of small properties for other households, and that affordable home ownership should focus more on delivering smaller family homes for younger households, including a higher proportion of 2 bed properties.

3.10 The SHMA also referred to Census data that identified that 11,242 households in Spelthorne contain someone with a long-term health problem or disability (28.5%). The SHMA also identified a projected growth in older people and a clear need to accommodate households that require adaptations to properties to meet their changing needs while others may require more specialist accommodation or support. This highlights the need for more accessible homes in Spelthorne in line with national and local plan policy.

3.11 Based on analysis of key worker incomes, the SHMA update found that single key workers are likely to require Social Rent housing or support from the Local Housing Allowance (“LHA”).

### **Housing and Economic Development Needs Assessment 2026**

3.12 The Council commissioned an update to its evidence on Housing and Economic Development Needs to inform the Local Plan Review which is set out in the HEDNA 2026. At the time of writing this SPD, the HEDNA was being developed. This section is able to reflect relevant finalised components available.

#### Existing Housing Stock

3.13 Data from the Spelthorne HEDNA indicates that the proportion of Social Rent dwellings in Spelthorne at 13% is lower than the South East region (14%) and England (17%). Private rented stock is also lower at 18%, compared with 19% in the South East and 21% in England.

#### Household Composition and Formation

3.14 Couples with non-dependent children are also high in Spelthorne (7.5% of households) when compared to the South East (6.5%) and England (6.3%). This may indicate that a number of households in the area have adult children still living with their parents, suggesting affordability issues that may prevent them from moving out.

#### Occupancy and Overcrowding

3.15 Spelthorne also has a higher level of overcrowding (5.1% of households) compared with the South East (3.4%) and England (4.4%) and also has a lower proportion of underoccupied dwellings. The assessment found that the high proportion of ‘right-sized’ and overcrowded properties suggests there is a potential issue with the cost and size of stock in the area, as households are unable to find dwellings that have

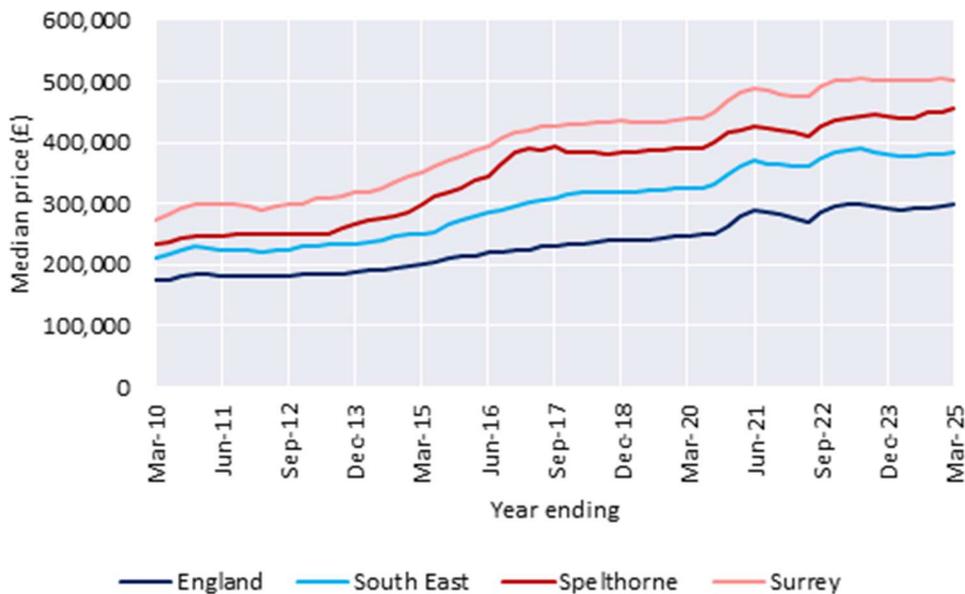
the space that they need. Low levels of under-occupancy are also likely to reflect the relatively low proportion of homes with four or more bedrooms.

- 3.16 Furthermore, the occupancy rating differs significantly between tenures. Social Rent dwellings in all areas are more likely to be at capacity (63.3%) or overcrowded (11.6%) than other tenure types, followed by private renting (52.4%/ 10.9%), then ownership (18.1%/ 2.3%).

House Prices

- 3.17 The median house price in Spelthorne in the year to March 2025 was £455,000, significantly above the regional (£384,000) as well as the England median (£300,000), but below the Surrey median (£500,000). The cost of homes in Spelthorne has been consistently higher than both the South East and National medians since 2010 and the gap is widening.

Figure 1: House Prices in Spelthorne (March 2010 to March 2025)



Source: Office of National Statistics (“ONS”), House Prices for Small Statistical Areas (as referred to in the HEDNA)

- 3.18 During the period 2015-2025 the median house price in Spelthorne has increased by 51.7% (£155,050 in absolute terms). The following table shows the median house price by housing type (year to September 2024).

Overall	Detached	Semi	Terrace	Flat
£455,000	£677,250	£505,000	£435,000	£285,000

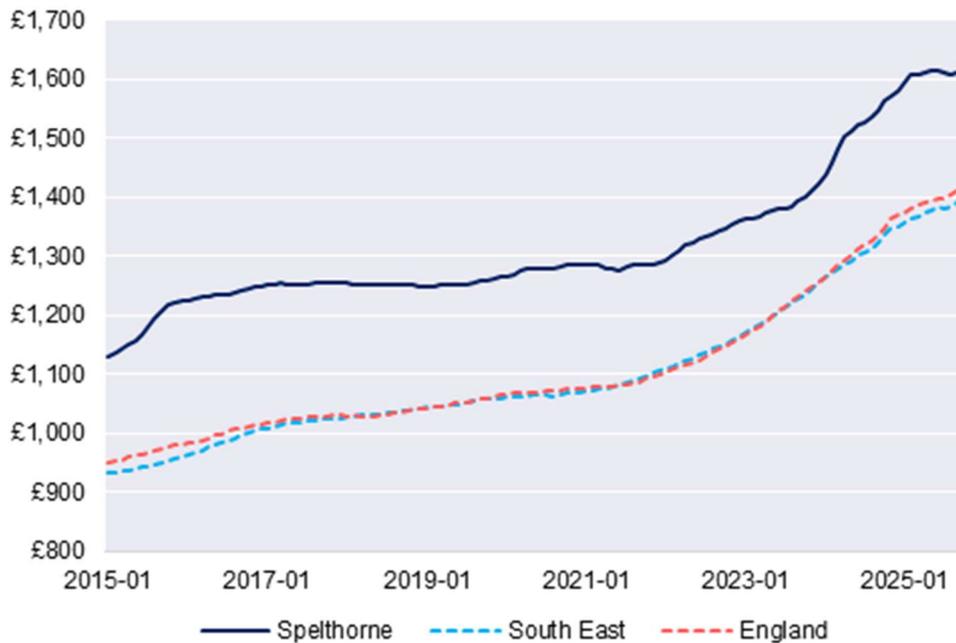
Affordability

- 3.19 The Office for National Statistics’ (“ONS”) workplace-based affordability ratio in Spelthorne, which compares the median earnings of individuals working within an area to the median house prices in that area is 10.44, compared to the regional figures of 9.61 and 7.71 across England. This has reduced slightly since 2020, however is significantly higher than the ratio recorded in 1997 at c.4.75, indicating

that is has become much more difficult for workers in Spelthorne to afford a home in the area.

- 3.20 As with the sales market, Spelthorne has higher median rental prices at £1,620 per month, compared with the South East (£1,393) and England (£1,416). This is the same for all property sizes, with median rents in Spelthorne ranging from £1,176 per month for one bed properties to £2,387 for four or more beds. The figure below shows how significantly rents have risen in Spelthorne, particularly since 2022. All areas have seen growth, with prices in Spelthorne consistently above those of the region and England over the period assessed.

Figure 2: Rental Cost Change (2015-2025)



Source: ONS Price Index of Private Rental Statistics (as referred to in the HEDNA)

Earnings and Household Income

- 3.21 Residents of Spelthorne have relatively high earnings compared to those in the broader South East and England. However, as noted above, the earnings to house price ratio is higher in Spelthorne.
- 3.22 Median, 25<sup>th</sup> and 75<sup>th</sup> percentile earnings in 2024 are set out in the table below.<sup>3</sup>

<u>Table 3: Median and 25/75th percentile earnings in 2024</u>			
	<b>Weekly</b>	<b>Monthly</b>	<b>Annual</b>
25th Percentile	£655	£2,838	£34,060
Median	£877	£3,800	£45,604
75th Percentile	£1,155	£5,005	£60,060

- 3.23 The median household income in Spelthorne is estimated at £67,400, with a lower quartile income of £39,300. There are modest differences between areas with the

<sup>3</sup> ONS Annual Survey of Hours and Earnings (HEDNA)

range of median incomes going from £62,200 in Stanwell & Stanwell Moor, up to £69,100 in Staines.

### Population Profile

- 3.24 Spelthorne's percentage of the population under the age of 16 (19.3%) is slightly higher than in the South East (18.5%) and England (18.4%), while the proportion that is over 65 (17.9%), is lower than the South East (19.8%) and England (18.7%).<sup>4</sup> This highlights the need for family sized housing in the area.

### Housing Needs

- 3.25 The HEDNA estimates that there are 3,589 households living in unsuitable housing in the borough, including 560 households who have no accommodation (homeless or concealed households) and 1,983 households in overcrowded accommodation.
- 3.26 The housing needs assessment in the HEDNA undertaken through the Standard Method shows an overall housing need for 793 dwellings per annum.
- 3.27 The HEDNA also assesses the annual affordable housing need which is estimated as 514 dwellings, which comprises of 355 homes for households who are unable to rent or buy market tenure homes and 159 households who are able to rent but not buy. When taking into account that some of the households will already be living in housing, and so providing an affordable housing option does not lead to an overall net increase, the need figure for those unable to buy or rent is 275 homes per annum.
- 3.28 As the methodologies for assessing overall housing need and affordable housing need are different, the HEDNA notes that comparison of the two is difficult. Nevertheless, it concludes that the evidence shows that affordable housing delivery should be maximised where opportunities arise.
- 3.29 The HEDNA recommends a tenure split between Low Cost Rent and Intermediate housing at an 80:20 ratio, with 80% of rented homes at social rent and the remainder at affordable rents. This is a slightly higher proportion of Low Cost Rent than the 75:25 split set out in Local Plan policy H2. The Council will continue to apply the approach in policy H2, however will keep this under review. The SPD also sets out a preference for Low Cost Rent to be provided as social rent, particularly larger units, given the significant need for social rent identified in the evidence base.

### Households on the Council Housing Register

- 3.30 There were 2,457 households on the Council's Housing Register in November 2025. Nearly two thirds of these households (1,592) are identified as being in more significant forms of need.<sup>5</sup> This includes households experiencing overcrowding, medical issues, homelessness, sharing facilities, as well as care leavers, households in need of supported housing, and those experiencing harassment and violence, amongst others.

---

<sup>4</sup> ONS (HEDNA)

<sup>5</sup> Band A – Emergency / Priority. Band B – Urgent need to move. Band C1 – Identified need to move. C2 - Cases with a reasonable preference need but no local connection.

<b>Table 4: Reason for housing need for households in more significant need</b>		
<b>Reason</b>	<b>Number of Households</b>	<b>Percentage</b>
<b>Overcrowding</b>	559	35%
<b>Medical</b>	322	20%
<b>Sharing facilities</b>	209	13%
<b>Homelessness</b>	201	13%
<b>Overcrowding Sharing Facilities</b>	142	9%
<b>Care Leaver</b>	68	4%
<b>Supported Housing</b>	30	2%
<b>Harassment &amp; Violence</b>	17	1%

- 3.31 More than 600 of these households have been on the register for more than two years. These households are in need of Social Rent / Affordable Rent housing, with the following bedroom size mix:

<b>Table 5: Required bedroom size mix for households in more significant need</b>		
<b>Bedroom Size</b>	<b>Number of Households</b>	<b>Percentage</b>
<b>1 bed</b>	590	37%
<b>2 bed</b>	527	33%
<b>3 bed</b>	387	24%
<b>4 bed or more</b>	88	6%

- 3.32 This is highly consistent with the housing mix recommended in the SHMA which the Council will continue to apply, and demonstrates a continued need for a balanced mix of one-, two- and three-bed units, with a smaller but essential requirement for larger three- and four-bed family homes.
- 3.33 The Council has also identified a particular need for wheelchair accessible Social / Affordable Rent homes which is partly reflected in the Housing Register data indicating a significant number of households with medical needs, as well as high demand for the Council's Disabled Facilities Grant Programme. This reinforces the importance of delivering a proportion of M4(3) homes as Social Rent wherever feasible, as set out in Section 4 of this SPD.
- 3.34 The SHMA, HEDNA and Housing Register consistently identify a high need for Social Rent and Affordable Rent housing and a balanced bedroom size mix. This evidence forms the basis of the Council's requirement for a 75% Low Cost Rent: 25% Intermediate tenure split, and the bedroom size mix set out in Section 4 of this SPD.

## 4. Affordable Housing Delivery

### Affordable Housing Thresholds

- 4.1 The table below provides a simplified overview of affordable housing thresholds to aid interpretation. It must be read alongside the detailed provisions of this SPD and the Local Plan policies which take precedence.

Site Type	Development Type	Affordable Housing Required (By Unit)
Brownfield Sites	<ul style="list-style-type: none"> <li>• 10+ Units (Net)</li> <li>• Site Area ≥ 0.5 Hectares ('Major Development')</li> </ul>	30% (20% Build to Rent)
Greenfield Sites		50% (20% Build to Rent)
Non-Greenfield green belt sites/ released from Green Belt		45% (35% Build to Rent)

- 4.2 In line with Local Plan Policy H2, the Council will require at least 30% affordable housing units on all schemes of 10 units (net) or more. Affordable housing will also be sought from sites of 0.5 hectares or more, in line with the national definition of major development, regardless of the number of units. Greenfield sites will be expected to deliver at least 50% affordable housing.
- 4.3 For major residential proposals on non-greenfield sites (including Grey Belt) involving land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, 45% affordable housing will be required.<sup>6</sup>
- 4.4 The minimum amount of affordable housing to be delivered should be calculated based on the net total amount of provided dwellings. The calculation will be rounded up to the nearest whole affordable unit. When calculating the tenure split, the number of Social / Affordable Rent units will be rounded up to the nearest whole unit.<sup>7</sup>
- 4.5 As set out in Policy H2, 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. This ensures that the affordable housing requirement reflects the capacity of the whole site and prevents artificial subdivision intended to fall below policy thresholds.
- 4.6 Any applications for major residential development which do not meet the relevant affordable housing thresholds above or criteria set out below, or where this is not

<sup>6</sup> This is in line with the NPPF which requires that before development plan policies are updated to reflect the green belt 'golden rules' the affordable housing contribution is 15 percentage points above the highest existing requirement that would otherwise apply, subject to a cap of 50%.

<sup>7</sup> Affordable housing numbers will be rounded to the nearest whole unit based on the net dwelling requirement. The 75% Low Cost Rent: 25% Intermediate tenure split will then be applied, with rounding discussed on a case-by-case basis to ensure the policy requirement and tenure priorities are met..

provided onsite, will be subject to viability assessment in line with the approach set out further below.<sup>8</sup>

- 4.7 The Council’s Local Plan affordable housing requirement is measured on a per unit basis. Where a form of development attracts a policy requirement to provide affordable housing, but does not provide self-contained units, the quantum of affordable housing required will be measured by floor area taking into account the circumstances of the case.

**Affordable Housing Tenure Mix**

- 4.8 The table below provides a simplified overview of the Council’s approach to affordable tenure mix. It must be read alongside the detailed provisions of this SPD and the Local Plan policies which take precedence. Definitions of the terms and tenures below are provided in the glossary.

<b>Table 7: Affordable Housing Tenure Mix Summary Table</b>		
<b>Affordable Housing Type</b>	<b>Proportion</b>	<b>Preferences and Requirements</b>
<b>Low Cost Rent:</b> <ul style="list-style-type: none"> <li>• <b>Social Rent</b></li> <li>• <b>Affordable Rent</b></li> </ul>	75%	<ul style="list-style-type: none"> <li>• Preference is Social Rent.</li> <li>• Affordable Rent should be up to LHA rates and no higher than 80% of market rent.</li> </ul>
<b>Intermediate Rent</b>	25%	<ul style="list-style-type: none"> <li>• Preference for Intermediate Housing is Intermediate Rent.</li> <li>• Eligibility: Households with a gross income lower than £65,000.</li> <li>• Total housing costs up to the lower of LHA rates and 80% Market Rent and not to exceed 40% of maximum net income.</li> </ul>
<b>Intermediate Ownership</b>		<ul style="list-style-type: none"> <li>• Shared Ownership generally only suitable for 1/2 bed homes.</li> <li>• Eligibility: Households with a gross income lower than £80,000.</li> <li>• Total housing costs not to exceed 40% of maximum net income.</li> </ul>

- 4.9 The Council will require a tenure split of 75% Low Cost Rent housing (Social / Affordable Rent) and 25% Intermediate housing (Intermediate Rent, Shared Ownership) based on the assessments of housing need, as referred to further above.

**Low Cost Rent Housing**

- 4.10 Low Cost Rent housing is provided for households in greatest housing need on the Council’s Housing Register through secure tenancies.

<sup>8</sup> However, where development takes place on land situated in, or released from, the Green Belt which is subject to the NPPF ‘Golden Rules’, site specific viability assessment should not be undertaken for the purpose of reducing developer contributions, including affordable housing.

- 4.11 The Council's preference is for the delivery of Social Rent when meeting the 75% tenure requirement for Low Cost Rent housing. This is provided at rents set in accordance with government policy and is the tenure that most effectively addresses housing need. This reflects the NPPF requirement that LPAs should plan to meet the needs of those who require Social Rent and that Social Rent is a key priority for the Social and Affordable Homes Programme 2026-36 ("SAHP"), with government setting out the expectation that at least 60% of all homes funded through the SAHP will be for Social Rent.<sup>9</sup>
- 4.12 There is a need for three and four bed Social Rent properties to provide homes for families and larger households. The Council will take this into account when assessing residential development proposals including those for other specialised residential types.
- 4.13 Family sized homes are not generally affordable when provided as Affordable Rent which is charged at rents which are significantly higher than Social Rent. Where Affordable Rent is provided, this should be limited to one and/or two bed units. To ensure that this remains affordable, rents should not exceed the relevant LHA rate and should also not be higher than 80% of market rent.<sup>10</sup>

### **Intermediate Housing**

- 4.14 Intermediate housing is provided for households with middle incomes who cannot afford to purchase or rent on the open market. This includes tenures such as Intermediate Rent and Shared Ownership.

#### Intermediate Rent

- 4.15 Taking into account median incomes in Spelthorne, the Council's preference is for the delivery of Intermediate Rent when meeting the 25% tenure requirement for Intermediate housing. Where evidence demonstrates a specific need for an affordable home ownership product, this form of affordable housing can be provided instead.
- 4.16 Intermediate rent is a discounted market rent product, provided in perpetuity, based on median incomes for households who are not eligible for Low Cost Rent housing. This is also known as affordable private rent in the context of Build to Rent development (see below). Intermediate rent can also be provided as a rent-to-buy product which enables the household to save towards a deposit to purchase the home as a shared ownership property after five years.
- 4.17 This form of affordable housing is also available for key workers who provide essential services that support the local and wider community and economy.<sup>11</sup> This approach also reflects that the previous NPPF minimum requirement for the provision of 10% affordable home ownership no longer applies. There is a particular need for three and four bed Intermediate Rent properties to provide more affordable Intermediate housing for families and larger households.

---

<sup>9</sup> Government is also consulting on including a minimum requirement for a proportion of new homes in each major development to be provided as Social Rent which the Council will apply if this is included in the revised NPPF.

<sup>10</sup> Rents should also not exceed 80% of market rents for the specific home (inclusive of service charges).

<sup>11</sup> Further guidance on the Council's approach to key worker housing is available here: [Spelthorne Council Key Worker Policy](#)

- 4.18 Total housing costs including rents and service charges for Intermediate Rent should not exceed the lower of the relevant LHA for the relevant size of property and 80% of the market rent for an equivalent property. This affordability requirement will be secured in Section 106 (“S106”) Agreements.

#### Intermediate Ownership

- 4.19 Shared Ownership is a part buy, part rent, affordable ownership product. However, this can be unaffordable for households with incomes at or close to median incomes, particularly for larger units with a high market value. Given local market values, Shared Ownership may only be affordable for smaller unit types; this SPD therefore encourages that, where it is delivered, it should be in the form of one or two bed units. Shared Ownership should be provided in line with the Council’s<sup>12</sup> and government guidance<sup>13</sup>.
- 4.20 Total housing costs, including mortgage repayments on equity purchases and rent on the unsold equity should remain affordable for households with a range of incomes below £80,000. These should not exceed 40% of net income for the maximum household income, which is the equivalent to £1,867 per month<sup>14</sup>. These affordability requirements will be secured in S106 Agreements.
- 4.21 First Homes are a Discount Market Sale, Intermediate ownership product that are sold at a discount to market value of at least 30% and subject to other criteria set out in national guidance.<sup>15</sup> The requirement to deliver a minimum of 25% of affordable housing as First Homes, as set out in 'Affordable Homes Update' Written Ministerial Statement dated 24 May 2021, no longer applies. The high market value of homes in Spelthorne, can result in Discount Market Sale products like First Homes being unaffordable to middle income households. As such, the Council will prioritise other Intermediate tenures, as set out above.

#### Eligibility for Intermediate Housing

- 4.22 Households with a gross income of up to £65,000 will be eligible for Intermediate Rent.<sup>16</sup>
- 4.23 Households with a gross income of up to £80,000 will be eligible for Intermediate ownership products.<sup>17</sup> Further eligibility criteria are set out in national guidance for Shared Ownership and First Homes (see footnote link).
- 4.24 Allocations for Intermediate housing should be prioritised for households with a local connection to Spelthorne that include at least one person who lives or works in Spelthorne at the time of their application. Where a tenant or purchaser with a local connection has not made a reservation for a property following three months marketing, during which the property must be available for occupation, the home may be let or sold (as relevant) to a household without a local connection.

---

<sup>12</sup> [Spelthorne Shared Ownership Strategy](#)

<sup>13</sup> [Shared ownership homes: buying, improving and selling: How shared ownership works - GOV.UK](#)

<sup>14</sup> Net income calculated on the basis of 70% of gross income. Affordability criteria in line with London Plan approach.

<sup>15</sup> [First Homes - GOV.UK](#)

<sup>16</sup> This can be updated based on the Consumer Prices Index from the date of this guidance but should not exceed the maximum income threshold for Shared Ownership set out in national guidance.

<sup>17</sup> Or as updated in national guidance.

## **Dwelling Types, Sizes, Standards and Design**

- 4.25 Affordable homes should be provided based on the following unit size mix which reflects evidence of housing needs for Low Cost Rent and Intermediate housing.

<b>Table 8: Affordable Housing Bedroom Size Mix</b>				
	<b>1 bed</b>	<b>2 bed</b>	<b>3 bed</b>	<b>4 bed</b>
<b>Low Cost Rent:</b>				
• Social Rent	35-40%	25-30%	25-30%	5-10%
• Affordable Rent				
<b>Intermediate</b>	15-25%	40-45%	25-35%	5-10%

- 4.26 This bedroom size mix is consistent with both the SHMA and the bedroom requirement profile in the Housing Register, which together demonstrate sustained need across one, two and three bedroom homes, and a smaller but critical need for four-bed family homes.
- 4.27 Affordable homes should be integrated within residential developments applying tenure-blind design and providing equal access to public realm and amenities for residents. This should avoid clustering or segregation of affordable units wherever possible, while also taking into account the management requirements of RPs, noting that in some apartment developments tenures may need to be located by building cores.
- 4.28 Unit sizes should not be lower than Nationally Described Space Standards (“NDSS”), and occupancy levels should not exceed those set out in NDSS.<sup>18</sup> Affordable homes should also achieve high-quality design including the provision of internal layouts to support healthy living in line with the National Design Guide<sup>19</sup>, Homes England Building for a Healthy Life principles<sup>20</sup> and Spelthorne Borough Council’s Design Code<sup>21</sup>.

## **Accessible Homes**

- 4.29 The NPPF requires local planning authorities to plan for people in their area with specific housing needs, including older people, and people with disabilities.
- 4.30 Based on evidence in the SHMA update, Local Plan policy H1, part 8 states that 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. The policy sets out requirements that all new build dwellings will, as a minimum, be constructed to Building Regulations M4 (2) Accessible and adaptable dwellings standards and any subsequent updates, unless it can be demonstrated that it is unfeasible to do so.
- 4.31 Major development schemes should also provide a minimum of 10% of new dwellings to accord with M4(3) Wheelchair user dwellings. All residential proposals should be accompanied by a document setting out how these standards are met. Any exemptions will only be considered where the applicant can robustly demonstrate that compliance would significantly harm financial viability, for example

<sup>18</sup> [Technical housing standards – nationally described space standard - GOV.UK](#)

<sup>19</sup> [National design guide - GOV.UK](#)

<sup>20</sup> [Building for a Healthy Life](#)

<sup>21</sup> [Design code | Spelthorne Borough Council](#)

due to the topography of the site makes provision not feasible, or would not be practical given flood risk. If this is the case, the provision of accessible homes would only be reduced by the minimum necessary and applicants are 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.

- 4.32 As identified above, there is a particular need for affordable wheelchair accessible housing in Spelthorne given the number of households on the Housing Register with medical needs and high demand relating to the Councils' Disabled Facilities Grants Programme. In view of this the Council will prioritise the provision of M4(3) wheelchair user dwellings as Social Rent (or Affordable Rent) housing. Accordingly, major residential developments should provide M4(3) wheelchair-user dwellings as Social Rent (or Affordable Rent) wherever practicable and viable.
- 4.33 For example, for a 100 unit development providing 30% affordable housing in line with Local Plan policy H2, 23 Social Rent homes would be provided in line with the required 75% Low Cost Rent: 25% Intermediate tenure split. Applying the 10% minimum M4(3) requirement to the scheme as a whole, at least 10 wheelchair accessible homes would be required, and these should be provided as Social/ Affordable Rent where practicable. Any exemptions to this approach will only be considered where it is robustly justified that this approach is not practicable or where there are wider benefits, for example if a level of affordable housing or Social Rent can be provided that is higher than the thresholds set out in policy H2.

#### **Other Residential Development Types**

- 4.34 The following sections consider the approach to various other types of residential development. The principles and criteria set out above also apply to these uses unless stated otherwise.

#### **Build to Rent**

- 4.35 As set out in Local Plan policy H1, 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 guidance (20%).<sup>22</sup> For major Build to Rent proposals on non-greenfield sites (including Grey Belt) involving land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, 35% affordable housing will be required.<sup>23</sup>
- 4.36 Local Plan paragraph 6.16 states that affordable housing on Build to Rent schemes should be provided by default in the form of affordable private rent. This is an Intermediate Rent product provided for households with middle incomes who cannot afford to purchase or rent on the open market. This should be provided in line with the eligibility and affordability criteria for Intermediate Rent housing as set out in the Affordable Housing Tenure Mix section of this SPD above.

---

<sup>22</sup> [Build to rent - GOV.UK](#) At the date of this SPD the Council intends to continue to apply the 20% threshold set out in planning practice guidance. This is subject to any updated benchmark level supported by further up-to-date evidence, plans or strategies that are published by the Council.

<sup>23</sup> This is in line with the NPPF which requires that before development plan policies are updated to reflect the green belt 'golden rules' the affordable housing contribution is 15 percentage points above the highest existing requirement that would otherwise apply, subject to a cap of 50%.

- 4.37 The Council also welcomes the provision of Social/ Affordable Rent housing in Build to Rent development where this is proposed by the applicant or as part of mixed for-sale and build to rent housing schemes, where this affordable housing is owned and managed by a RP. It is noted that Social / Affordable Rent is eligible for grant under the Social and Affordable Homes Programme 2026-36.

#### Management and Tenancy Arrangements

- 4.38 In line with national guidance, affordable private rent (Intermediate Rent) and market rent units within a development should be managed collectively by a single build to rent landlord. The affordable units should be distributed throughout the development and physically indistinguishable from the market rent homes in terms of quality and size.
- 4.39 As with other affordable housing tenures, the process for managing the affordable housing will be set out in the S106 Agreement. This should set out the approach to lettings, total housing costs (including rents and service charges), apportionment of the homes across the development, and eligibility and marketing arrangements in line with this SPD and national guidance.
- 4.40 Build to Rent scheme operators will be required to provide an annual statement, confirming the approach to letting the affordable units, their ongoing status, and clearly identifying how the scheme is meeting the overall affordable housing level required in the planning permission. This requirement should be set out in the S106 Agreement.
- 4.41 In line with national guidance, the Council will also require:
- A planning condition that scheme operators offer tenancies of three or more years to all tenants in the development, who are eligible to live in the country for that period (under the right to rent). This should apply to all tenants, whether paying market rent or affordable private rent.
  - That there is no obligation on customers to take up the offer of a three year tenancy. They may prefer a tenancy of six months, one year or two years, and companies should offer these as an alternative, if requested.
  - That where the rent or service charges are to be reviewed during the period of the tenancy, the basis for the review and for calculating the increase (whether as a fixed percentage or index linked to inflation) should be clearly set out in the tenancy agreement.
  - That tenants should not be locked into longer tenancies for the full period of the agreement. Tenants should have the option to terminate at one months' notice, after the first six months, without a break fee being payable.

#### Covenant, clawback and commuted sums

- 4.42 Build to Rent schemes would normally, by definition, remain within the rental sector, under common ownership and management, for the long term. To remove any financial incentive from benefiting from the lower affordable housing threshold for Build to Rent development, and then selling market units out of rented tenure, operators will be expected to commit to a covenant to retain market rent homes in rental tenure for a period of at least 15 years, and a clawback mechanism if this is broken.

- 4.43 The appropriate clawback amount will be the difference between the total value of the market rent units, assuming vacant possession, and those units valued on a 'for sale' basis at the point of sale. The Council should be notified of the sale price of units that are sold and this should inform the market value of remaining units to determine the clawback.<sup>24</sup>
- 4.44 Any affordable private rent homes included as part of a scheme, through a S106 agreement, are provided specifically as a community benefit in perpetuity. The sale of a Build to Rent scheme, or the sale of individual homes within the scheme to other tenures, should not result in the loss of the affordable housing contribution.

### **Specialist Accommodation**

- 4.45 Local Plan policy H1 part 10 states that 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.
- 4.46 Where specialist accommodation falls within a relevant use class as set out in policy H2(g) (C2, C3 or C4), an appropriate proportion of affordable housing in accordance with Policy H2 will be required (30%, or 50% on greenfield sites), with the mix of tenures negotiated by the Council having regard to advice from appropriate specialist bodies.
- 4.47 When assessing this, given the extent of need for Social / Affordable Rent housing in Spelthorne, which is estimated to account for c.60% of annual housing needs, the Council will seek the provision of affordable housing within specialist accommodation as Social/ Affordable Rent wherever possible.
- 4.48 Other forms of specialist accommodation that provide affordable housing for households with specific needs such as hostels for rough sleepers or victims of domestic abuse, or accommodation for care leavers, will not be required to provide additional C3 affordable housing. Applicants seeking to provide these forms of accommodation should engage with the Council early, at pre-application stage if possible, so the approach for these applications can be fully considered.

### **Self and Custom Build Housing**

- 4.49 Local Plan policy H1 part 13, states that 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 Spelthorne. The Council will negotiate a mix of plots, informed by its self-build and custom housebuilding register.
- 4.50 Under policy H2, affordable housing is not sought from minor developments of less than 10 units, and so will not apply for smaller developments involving Self and Custom Build housing. For major developments where self and custom build

---

<sup>24</sup> A methodology for determining the value of the rented units should be set out in the S106 agreement to enable to level of clawback to be calculated in the event that the covenant is broken.

housing is provided as part of the market housing within the scheme, the affordable housing requirements under policy H2 will apply. The custom and self build homes will be counted as market housing when assessing the level of affordable housing required and the estimated revenue and costs should be taken into account in any Financial Viability Assessment (“FVA”) submitted.

### **Community Led Development and Rural Exception Sites**

- 4.51 The Council will support the delivery of community led development and rural exception sites where these meet the relevant criteria in the NPPF including that the majority of homes should be affordable, taking into account the tenure and affordability requirements set out in Local Plan Policy H2 and this guidance. These are small sites that should address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection.
- 4.52 Some market homes may be allowed on the site where essential to enable the delivery of affordable units without grant funding, however the number of affordable homes should be maximised, and the proportion of market housing should not exceed 40% of the homes provided.
- 4.53 In line with national policy, these sites should be adjacent to existing settlements, proportionate in size to them<sup>25</sup>, not compromise the protection given to areas or assets of particular importance in the NPPF, and comply with design policies and standards set out in the Local Plan.

---

<sup>25</sup> Community-led development exception sites should not be larger than one hectare in size or exceed 5% of the size of the existing settlement.

## **5. Application Procedure and Engagement**

### **Procedure for Affordable Housing in the Application Process**

- 5.1 Applicants should engage with the Council at an early stage, via pre-application discussions, for applications where a policy requirement to provide affordable housing applies. They should set out details of the proposed affordable housing in line with the Local Plan, this SPD and national guidance in an Affordable Housing Statement to be submitted with the application. The Affordable Housing Statement should clearly demonstrate how the proposal accords with Policy H2 and this SPD and identify any areas where deviation is proposed, with justification.
- 5.2 Draft S106 Heads of Terms should also be provided setting out the number and percentage of affordable units, tenure, nomination rights, unit size mix, affordability, eligibility and accessibility requirements, and other criteria set out in this SPD and national guidance. For outline applications where the specific number of housing units may vary, the overall percentage and tenure of the affordable housing should be set out.
- 5.3 Affordable housing planning obligations which reflect the approach in this SPD and relevant guidance, and which are necessary to make the development acceptable in planning terms, will be secured within the S106 agreement which will be signed on the date that or prior to the permission being issued.

### **Engagement with Registered Providers and Grant Funding**

- 5.4 Affordable homes secured in S106 Agreements are typically purchased from developers by RPs who manage the properties, with nomination rights given to the Council for households on the Housing Register. As well as meeting housing need, the provision of affordable housing alongside market tenures reduces exposure to 'market absorption' sales rates, speeding up housing delivery and provides income for developers at an early stage of the construction process.
- 5.5 The Council's preference is for affordable housing to be delivered by RPs, although affordable housing delivery by suitably qualified charitable organisations and community led housing groups is also welcomed where this meets the criteria set out in this guidance. This guidance uses the term "RP" for all organisations that might provide affordable housing. Community led housing development is considered further below.
- 5.6 The wider RP market for S106 affordable homes has been affected by financial constraints on Social Landlords, however a number of steps have been taken to recapitalise RPs. In addition, in some cases RPs have also identified concerns with the design, tenure mix and management arrangements of S106 affordable homes. To address this, applicants should engage with RPs and the Council at an early stage and take into account their requirements relating to the design, tenure mix and management arrangements for affordable homes to meet future tenants' needs.<sup>26</sup> Applicants should notify the Council of their intended RP partner during pre-application or, for minor schemes, at the earliest opportunity. They should also evidence how they have taken into account RP requirements with respect to the

---

<sup>26</sup> This should include requirements set out by the G15 group of large housing associations, available here: [S106-Guidance-Building-together-Building-better.pdf](#)

design, mix, accessibility and management of the affordable homes prior to any contractual commitment.

- 5.7 The Council may, where appropriate, use funding sources such as Right to Buy receipts, the Local Authority Housing Fund, or commuted sums to acquire affordable homes directly. Applicants are therefore encouraged to engage with the Council at an early stage where acquisition by the Council may be an option.
- 5.8 RP partners should also explore the availability of grant funding under the Social and Affordable Homes Programme 2026-36 and any other relevant or subsequent funding programmes to maximise the delivery of affordable housing in Spelthorne.
- 5.9 In view of this and steps being taken at a national level to support demand for S106 affordable homes, and in line with national policy, the Council will not accept 'cascade' mechanisms in S106 agreements that set out provisions that enable applicants to change the tenure of affordable homes or for these to be sold to market tenure.
- 5.10 If an applicant proposes to provide a financial contribution in lieu of on-site affordable housing, including in respect of seeking a variation to a S106 agreement to change the tenure of the affordable home due to not being able to find a purchaser, the Council will take into account the following factors:
- Whether evidence is provided that demonstrates that a scheme is genuinely stalled due to the lack of a purchaser.
  - Whether the developer has undertaken all reasonable actions to find a buyer based on the marketing of the homes and notification of RPs active in the area and undertaken other relevant requirements in the S106 agreement.
  - Whether the applicant has marketed the affordable homes on the Homes England Clearing Service or alternative platform.
  - Whether the affordable homes could be changed to a more affordable tenure which would more effectively meet affordable housing need and attract greater RP demand, such as Social Rent or Affordable Rent (or switching to Intermediate Rent from Shared Ownership).
  - Whether the homes have been completed or are due for completion by 1 December 2027.<sup>27</sup>
  - Whether the developer has informed the Council of any and all bids received from RPs. The Council will also not accept a change to a less affordable or market tenure if the applicant has received a reasonable offer from a willing and suitable RP or the Council, and will consider whether this reflected the market value of the relevant homes at the time of the bid.
- 5.11 In the event that the Council considers that an amendment to the relevant tenure may be acceptable, it will seek the provision of an alternative affordable tenure, or if there is no buyer for such a tenure, the equivalent affordable housing should be provided on an alternative site within the Council's area. If this is demonstrated not to be feasible, a financial contribution should be made in lieu of onsite affordable housing in line with the approach set out in this SPD below.

### **Variations to Affordable Housing Planning Obligations**

---

<sup>27</sup> Completion is defined as when a home is ready for occupation or when a completion certificate is issued.

- 5.12 The Council encourages proposals that increase the level of affordable housing or the affordability of homes, compared with that secured as part of the original application. This may arise for various reasons, including where an applicant switches from market tenure housing or Shared Ownership to tenures that better meet housing need and are in greater demand from purchasers, or due to the availability of additional grant.
- 5.13 Applications that propose a reduction in affordable housing or changes that reduce affordability will be subject to viability testing in line with the approach set out in this SPD further below. Any application seeking to amend affordable housing requirements must present clear evidence of the changed circumstances being relied upon, as well as an explanation of why these circumstances could not have been anticipated when the original permission was granted.
- 5.14 The Council will carefully scrutinise applications to revisit fundamental issues of viability of planning obligations, including Section 73 applications.<sup>28</sup> The applicant should provide a robust justification for any changes proposed to planning obligations associated with the original permission. The Council will have regard to the harm that such a reduction or change in affordability may cause and give this appropriate weight in the overall planning balance.

#### **Vacant Building Credit**

- 5.15 The NPPF 2024 states that to support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount. This is known as Vacant Building Credit (“VBC”). This would be equivalent to the existing gross floorspace of the existing buildings. The approach does not apply to vacant buildings which have been abandoned, or to major development on land within or released from the Green Belt, for which the NPPF ‘Golden Rules’ should apply.
- 5.16 However, the Draft NPPF published in 2025 omits any references to VBC, which indicates the government’s intention to withdraw this. This reflects their manifesto commitment to strengthen the existing developer contributions system and to deliver the biggest boost in social and affordable housebuilding in a generation. In view of this, and the significant need for affordable homes in Spelthorne, the Council will not apply VBC if it does not form part of national policy, and will otherwise carefully consider its application alongside housing need, and the government’s intentions to significantly boost affordable housing delivery.
- 5.17 All schemes where the applicant considers that the VBC should be applied will be subject to viability assessment to demonstrate that the maximum possible level of affordable housing is being provided in line with the approach set out in this SPD further below.
- 5.18 When assessing any application that seeks to rely on VBC the Council will also seek to ensure that this operates in a way that delivers the intention of policy and does not reduce the level of affordable housing in schemes that would have come

---

<sup>28</sup> The statutory basis for seeking variations to affordable housing secured through planning obligations in S106 agreements is S106A of the Town and Country Planning Act 1990 (as amended), whereas the legal purpose of S73 applications is to enable the discharge of or variation to planning conditions that form part of the planning permission, which are not normally used to secure affordable housing.

forward without it. As such, if relying on VBC, the applicant should demonstrate how this provides an incentive for brownfield development on sites containing vacant buildings that would not otherwise have been developed.

- 5.19 In line with this, the Council will have regard to the following factors when assessing whether VBC should apply:
- The building is not in use at the time the application is submitted.
  - The site is not subject to an extant or recently expired permission.
  - The site is not allocated for an alternative land use to that being proposed; and
  - The building has not been made vacant for the sole purpose of redevelopment.
- 5.20 To demonstrate that a building has not been made vacant for the sole purpose of redevelopment, an applicant would be required to provide evidence that the relevant buildings have been vacant for a continuous period of three or more years before the application was submitted and to provide evidence that the site has been actively marketed for at least two years at realistic market prices. These should be demonstrated through the provision of two independent market valuations. All bids or offers from prospective tenants or purchasers should be provided to the Council.
- 5.21 It should be noted that if an applicant is claiming that the scheme qualifies for VBC, it cannot also claim for a reduction in Community Infrastructure Levy through the occupancy test.
- 5.22 Where the Council considers that the VBC applies because the above criteria are met, the relevant affordable housing requirement (as set out above), should be applied on a gross floorspace basis to residential uses within the proposed development. The gross floorspace of existing vacant buildings that meet the criteria above will be deducted from this figure to determine the reduced affordable housing requirement. Gross floorspace figures for the existing and proposed buildings should be provided by the applicant and set out on plans.

## **6. Financial Contributions in Lieu of On-site Affordable Housing**

6.1 Paragraph 64 of the NPPF states that policies should expect the required affordable housing to be met on-site unless:

- Off-site provision or an appropriate financial contribution in lieu can be robustly justified; and
- The agreed approach contributes to the objective of creating mixed and balanced communities.

6.2 In line with policy H2(2)(b)(iii) of the Local Plan, the Council will only accept a financial contribution in lieu of on-site affordable housing where it can be satisfactorily demonstrated that on-site or off-site provision is not feasible.

6.3 This SPD sets out circumstances where the Council may agree that on-site or off-site provision is not feasible. It also sets out the methodology that will be used to determine the level of financial contribution that would be required where the Council has agreed to accept one. Any acceptance of a financial contribution will be strictly exceptional and evidence led.

6.4 This SPD also confirms how these financial contributions will be collected and spent by the Council.

### **When a Financial Contribution may be Acceptable**

6.5 Where an applicant is seeking to provide affordable housing off-site, or in the form of a financial contribution, the applicant should engage with the Council as early as possible, preferably at the pre-application stage.

6.6 A financial contribution will only be acceptable where proportionate and robust evidence demonstrates the following:

- There are demonstrable practical difficulties with providing affordable housing on-site that cannot reasonably be overcome.
- There is no alternative site within Spelthorne which could feasibly accommodate the affordable housing.

6.7 Guidance on engagement with RPs is set out in Section 5 on this SPD. It sets out the factors that the Council will consider if an applicant seeks to provide a financial contribution in lieu of on-site affordable housing, including in relation to a variation to a S106 agreement to change the tenure of an affordable home due to the applicant/developer not being able to find a purchaser.

6.8 With respect to demonstrating that there are no off-site options that could feasibly accommodate the affordable housing, applicants must provide evidence of having carried out a systematic search of sites with residential development potential being marketed for sale. Reasons why sites identified cannot feasibly accommodate the affordable housing should be provided – these could relate to location, capacity, deliverability or any other constraint. At its discretion, the Council may decide to appoint an external expert to assess the site search carried out and the reasonable costs of doing so must be met by the Applicant. The scope of any site search should be proportionate to the scale of the affordable housing requirement and should focus on sites capable of timely delivery within Spelthorne.

- 6.9 Any alternative site identified by an applicant as being feasibly able to accommodate the affordable housing would need to be agreed by the Council as being suitable.
- 6.10 Applicants seeking to provide a financial contribution must also provide an explanation as to why the provision of the contribution will support the objective of creating mixed and balanced communities.
- 6.11 The responsibility for demonstrating that a financial contribution is justified lies with the applicant and any submitted evidence will be robustly assessed by the Council to ensure that non-delivery of affordable housing on-site is an exception. At its discretion, the Council may decide to appoint an external expert to assess evidence submitted by an applicant and the reasonable costs of doing so must be met by the applicant.
- 6.12 All applications that seek to provide a financial contribution in-lieu of on-site affordable housing must be accompanied by a Financial Viability Assessment. The Council will appoint an external expert to assess the submitted assessment and the reasonable costs of doing so must be met by the applicant.

#### **The Approach to Determining the level of a Financial Contribution**

- 6.13 The level of contribution should be equivalent to a policy compliant level of affordable housing, or if this is found to not be viable, the maximum viable amount of affordable housing, assuming a policy compliant tenure and unit mix, that would be provided on-site if it were feasible to do so.
- 6.14 In principle, the contribution should be equivalent to the difference in value between the scheme as proposed without affordable housing, and the same scheme with a policy compliant level of affordable housing, or if this is found to not be viable, the maximum viable amount of affordable housing. Additional CIL and Sales/Marketing fees arising for the developer as a consequence of providing additional market tenure housing can also be accounted for. At its own discretion the Council may consider other factors, or if circumstances direct, an alternative approach.
- 6.15 The contribution should not assume an increased developer return that may arise from the provision of additional market tenure housing. This is to ensure that the overall level of financial contribution received by the Council is close to equivalent to what would have been provided had on-site delivery been feasible. This ensures there is no financial benefit to the applicant relative to on-site provision, nor an additional incentive to provide a financial contribution.
- 6.16 Applicants should use the following formula to calculate a financial contribution equivalent to on-site provision:

### **Financial Contribution Formula**

$$X = ((A - B) \times C) - D - E$$

X = the financial contribution (£).

A = the average market value of a square metre of floorspace in the development.<sup>29</sup>

B = the average value of affordable housing per square metre of floorspace.<sup>30</sup>

C = the number of square metres of affordable housing floorspace equivalent to a policy compliant affordable housing offer, or where this is found to not be viable, the maximum viable amount of affordable housing identified through the viability assessment process.

D = Net increase in CIL chargeable amount arising from the provision of additional market units

E = Additional sales/marketing fees relating directly to the disposal of the additional market housing units

- 6.17 All components above should assume a Net Sales Area (or an appropriate equivalent where this replaces it), as set out in the Royal Institution of Chartered Surveyors' ("RICS") most recent Code of Measuring Practice.
- 6.18 The components of the formula should be set out and evidenced within the FVA submitted by the applicant and agreed with the Council through the viability assessment process. Component B should represent a blended value of the affordable housing tenures assumed – the submitted FVA should clearly show how this component has been calculated.
- 6.19 The responsibility for calculating the contribution in line with the methodology set out in this document lies with the applicant. The Council will appoint an external expert to assess the submitted FVA and the calculation of the contribution carried out, and assumptions and evidence referred to in doing so. The reasonable costs of doing so must be met by the applicant. All calculations and datasets must be provided in an auditable form so that the calculation of the components of the formula can be independently verified.
- 6.20 Viability review mechanisms will apply to all schemes providing a financial contribution in lieu of on-site provision, reflecting the approach set out in Section 7 of this SPD, unless the contribution is accepted by the Council to be equivalent to a policy compliant amount of affordable housing. These should reflect the methodology advised in Section 8 of this document. The review mechanisms can result in an increased contribution being payable.
- 6.21 Certain types of development may be less suitable for the provision of on-site affordable housing, such as student accommodation or purpose-built shared living. This is because these schemes do not provide a secure and long-term housing

---

<sup>29</sup> This should be calculated by dividing the total GDV of the market tenure homes by the net floorspace of the same homes.

<sup>30</sup> Reflecting the tenure split and unit size mix set out in the Local Plan or subsequent affordable housing need evidence produced by or on behalf of the Council.

option for those on the housing needs register, especially families, nor do they deliver self-contained dwellings that meet national space standards. As a result, the provision of affordable housing units on-site would not normally be appropriate. Any financial contribution payable in respect of these development types should be calculated and paid in line with the guidance in this section.

### **Collection and Expenditure of Financial Contributions**

- 6.22 The default position is that a financial contribution is payable on commencement of construction of the proposed scheme. In exceptional circumstances (such as in the case of phased schemes) and at its own discretion the Council may agree a different payment profiling approach.
- 6.23 The collection and expenditure of Financial Contributions will be reported annually in the Council's Infrastructure Funding Statement, including the number and tenure of affordable homes delivered and any acquisitions or conversions funded.
- 6.24 Financial Contributions will be spent on the provision of affordable housing in Spelthorne. The Council will do this in a variety of ways and will pool contributions as necessary and therefore requires sufficient flexibility for this to be reflected within the S106 Agreement or Unilateral Undertaking.
- 6.25 The Council will prioritise the provision of new Social and Affordable Rent Homes using financial contributions collected. Expenditure may involve purchasing affordable or market tenure units on the open market, including from a developer (which may be on a Forward Fund basis), and providing them as affordable housing. It can also involve direct delivery by or on behalf of the Council, or the provision of grant funding to an RP. The Council may also use financial contributions to convert Intermediate affordable homes to Social or Affordable Rent.
- 6.26 Given the significant levels of housing need and homelessness, and the acute shortage of affordable housing within Spelthorne, such financial contributions may also be used to support the acquisition of properties for temporary accommodation.

## **7. Viability Assessment**

- 7.1 Policy H2(2)(b) of the Local Plan requires that 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 a viability assessment at the application stage to determine the maximum viable level of affordable housing.
- 7.2 Given that the delivery of affordable housing is a key priority for the Council, applicants are expected to explore a range of options before seeking to reduce affordable housing provisions in a planning application below policy compliant levels. The approach to be taken will need to vary on a case-by-case basis but could involve the prioritisation of affordable housing provision above other policy requirements and financial obligations.
- 7.3 This section provides guidance on viability assessment at application stage. It provides an overview of what an FVA is and sets out the process for viability assessment in Spelthorne, including when FVAs can be submitted, the role of the viability assessor, information requirements, how key inputs/assumptions into an FVA should be assessed and how its results should be reported and interpreted.

### **What is a Financial Viability Assessment?**

- 7.4 An FVA is a document submitted in support of a planning application typically to justify the application not proposing to provide a policy compliant level of planning obligations, usually affordable housing. An FVA can also comprise of an assessment commissioned by the Council to review an FVA submitted by an applicant.
- 7.5 FVAs primarily use the residual method of valuation, which assesses whether a scheme is financially viable by deducting the costs of development from the value that it will generate through the sale and letting of the completed scheme. The output of an appraisal in an FVA can be either of the following:
- The Residual Land Value (“RLV”), which is the amount of money available to purchase the site. This is then compared with the Benchmark Land Value (“BLV”) which is considered later in this section.
  - The residual developer’s return, which is the amount of money available for the developer as profit. This is then compared with a target developer return.
- 7.6 The diagram below provides a summary of the values and costs typically included in viability assessment and shows a RLV output approach:<sup>31</sup>

---

<sup>31</sup> The diagram is illustrative and the values and costs for a specific scheme may be of a different proportion to those indicated in the diagram.

Affordable Housing		Residual Land Value (Output)
		Finance Costs
Market Tenure Housing		CIL and Planning Obligations
		Developer Return
		Disposal Costs
		Professional Fees
		Construction Costs
Scheme Value		Scheme Costs

**Viability Assessment Process**

**When can a Financial Viability Assessment be Submitted in Spelthorne?**

- 7.7 Where a development proposal set out in a planning application attracts an affordable housing policy requirement under Local Plan policy H2, and an applicant considers that a scheme is not capable of providing a policy-compliant level of affordable housing, the applicant will be required to submit an FVA to evidence this position. All applications proposing a financial contribution in lieu of on-site affordable housing are required to be accompanied by an FVA.
- 7.8 The NPPF 2024 describes that the use of site-specific viability assessment for land within or released from the Green Belt should be subject to the approach set out in national planning practice guidance on viability. This guidance states that where development takes place on land situated in, or released from, the Green Belt and is subject to the NPPF 'Golden Rules', site specific viability assessment should not be undertaken for the purpose of reducing developer contributions, including affordable housing. Whilst the adopted NPPF and national planning practice guidance on viability states this, the Council will not accept FVAs submitted in respect of such schemes.
- 7.9 It is a local planning application validation requirement to submit an FVA and this should, where possible, be provided as part of pre-application stage discussions.
- 7.10 It is for applicants to demonstrate whether particular circumstances justify the need for viability assessment at the application stage. Particular circumstances could include where:

- The development is significantly different from any typology assumed in the Council's Viability Study.
- Site characteristics differ substantially from the assumptions used to assess viability when the relevant development plan policies were prepared.
- The development is demonstrably burdened by costs which were unforeseeable when the development plan was prepared.
- Site or economic circumstances have changed significantly since the development plan was prepared.

### **Role of the Viability Assessor**

- 7.11 FVAs should provide an independent, objective and realistic assessment of the development site; be based on relevant evidence; and follow the approach in this guidance, as well as guidance published by the Government, and Professional Standards published by the RICS. FVAs should use standardised inputs and not necessarily those that apply to a specific applicant or developer.
- 7.12 Assessors should be suitably qualified, and act in accordance with Professional Standards published by the RICS including the need to ensure objectivity and professional integrity. Assessors and consultancy firms must act in the public interest and take responsibility for their actions to maintain public confidence in the process.
- 7.13 In an FVA, the assessor should confirm that:
- They have acted impartially and with reference to all appropriate sources of information.
  - No performance-related or contingent fees have been agreed.
  - The report has been prepared on the basis that it can be made publicly available.
  - Where the assessment relies on external contributors, they are considered to be competent and understand that they must comply with Professional Standards published by the RICS.
  - Adequate time was taken to produce the assessment, proportionate to the scale and complexity of the application.

### **Information Requirements**

- 7.14 FVAs, including those commissioned by the Council as Local Planning Authority, must include detailed evidence that justifies the inputs and assumptions adopted. The role of the Council is to scrutinise submitted viability information; the evidential burden lies with the applicant.
- 7.15 The FVA must include full details of the proposed scheme, including site area, residential unit numbers by tenure, and unit sizes. Floorspace figures should also be provided for both residential uses (by tenure) and non-residential uses by Gross Internal Area and Net Sales Area.

- 7.16 FVAs should be based upon and refer back to the Viability Study that informed the Local Plan. The FVA should identify where it adopts different inputs and assumptions and provide evidence for doing so.
- 7.17 The costs of resourcing an FVA prepared on behalf of the Council acting as the Local Planning Authority, must be met by the applicant. This includes but is not limited to the costs of specialist expertise such as relating to construction costs, the development programme, or formal valuations relating to the existing site or proposed scheme. The Council will select the most appropriate viability consultant or expert specialist to act on their behalf, in line with the Council's procurement process.
- 7.18 The Council will endeavour to notify the applicant of these costs as soon as possible, although it may be necessary to update these costs throughout the course of the application, following further consideration of the information submitted.
- 7.19 To support public engagement, FVAs should include a clear Non-technical Summary which outlines the key inputs, assumptions and conclusions of the assessment. They should also include appraisal summaries showing all value and cost inputs including allowances for land, finance and required developer's return, and the outputs of the assessment.
- 7.20 The applicant should also provide the full working viability appraisal model in an unlocked and editable format, which should use commercially available software such as Argus Developer.
- 7.21 Where the applicant's and the Council's assessors disagree, the parties should seek to resolve these differences of opinion, where possible through the submission of further evidence and follow up assessments. Amendments to the development proposal, such as an increase in the level of affordable housing and/or an improvement in affordable housing tenure or affordability, may be required, based on the FVAs carried out.
- 7.22 The Council will make FVAs, related information, all related correspondence/future iterations and information submitted in respect of Viability Review Mechanisms, publicly available in full unless there are statutory grounds not to.
- 7.23 In very exceptional circumstances, prescribed by legislation, there may be legitimate reasons for not publishing elements of FVA-related information. For this to be the case an applicant should provide a full justification of the reasons for this as soon as these are known. These reasons will be carefully reviewed by the Council with reference to the overriding public interest.
- 7.24 In submitting viability information, an applicant does so in the knowledge of the approach set out in this guidance and knowing that the Council may not accept the applicant's view that information should not be made publicly available.

### **Key Inputs and Assumptions**

#### Gross Development Value ("GDV")

- 7.25 The GDV of a scheme is its combined value, comprising of:
- The sales values of residential units, parking spaces and any other buildings or land to be sold.

- The capitalised rental value of any investment elements of the scheme before any deduction for purchaser's costs.
- 7.26 The value of the investment elements of a scheme are usually represented on a Net Development Value basis which is the GDV less any allowance for the deduction of the purchaser's costs. Purchaser's costs are the typical acquisition costs that a buyer would reasonably incur when purchasing a property and can include Stamp Duty Land Tax, Agency and Legal Fees.
- 7.27 Residential sales values should be based on Market Value (as defined by the RICS) and justified with reference to up-to-date transactions for comparable new build properties and other forms of relevant market evidence.
- 7.28 Values should be adjusted to take account of any differences between the comparable evidence and the application scheme, with a clear justification provided for any differences. The methodology used to make adjustments for location, facilities, quality of construction, height, aspect and specification should be provided. An FVA should usually include a unit-by-unit pricing schedule.
- 7.29 Where the investment approach is used for the valuation of commercial or residential property, rents should be based on market evidence.
- 7.30 Assumptions on pre-lets, rent-free periods and letting voids should be supported by market evidence, and the impact on value clearly set out.
- 7.31 FVAs for residential investment schemes such as Build to Rent, student accommodation and shared living, should include a breakdown of gross rents and operating expenses to evidence the net rental income assumed.
- 7.32 Operating expenses should be supported by detailed information, including an itemised list of cost headings based on comparable completed and occupied schemes. The figures should be provided as a percentage of gross rent, and on a per-unit and per-square-foot/metre basis.
- 7.33 Investment yields should be based on an analysis of market evidence. Supporting evidence should include transaction amounts, the nature and timing of the receipt (for example, the details of income under a forward funded transaction or receipt from a sale at stabilisation). Yield evidence should be applied in a manner consistent with the analysis of that yield and the type of transaction assumed. The transactions referred to should be analysed on a per-unit and per-square-metre/foot basis to enable accurate comparison.
- 7.34 Purchaser's costs used to derive a Net Development Value should be fully justified and take account of the value of the transaction to which they relate. Purchaser's costs should be based on costs likely to be incurred, taking account of the probable nature and timing of any transaction, economies of scale and any reliefs that may be available (for example, relief on Stamp Duty Land Tax). With respect to residential investment schemes such as Build to Rent, these are not always incurred if the developer and operator are the same entity or may be substantially lower if a special purpose vehicle would be the likely purchaser of the scheme.
- 7.35 With respect to values for affordable housing, these should reflect early engagement with RPs and any offers agreed for the proposed units. Affordable housing values should otherwise be derived using the Investment Method of valuation and a Discounted Cash Flow Analysis. All inputs should be clearly set out

and justified including management, major repairs and maintenance costs. Values should also include capital receipts as appropriate (including staircasing receipts for shared-ownership units).

- 7.36 It will usually be appropriate for appraisals in FVAs to reflect early payments made by Registered Providers which can improve a scheme's cashflow and viability.
- 7.37 Estimated grant funding and any other form of public subsidy should be included in the appraisal cashflow when this is or is likely to be made available by the relevant authority. No developer's return should be applied to this.

#### Sales Timings

- 7.38 The timing of income should take into account the type of residential development proposed and the way the scheme is likely to be funded. FVAs for Build for Sale residential schemes should include off-plan sales and post-completion sales rates. These must be benchmarked to comparable schemes and justified with reference to local absorption rates.
- 7.39 Income from residential investment developments should generally be modelled in line with expected delivery models.
- 7.40 Income for affordable housing should normally be assumed at different stages over the construction period in line with typical arrangements between developers and RPs.
- 7.41 Income from commercially property should generally be assumed at practical completion unless there is market evidence which indicates a different approach.

#### Construction Costs

- 7.42 FVAs submitted by applicants should be supported by elemental Cost Plans that are consistent with the level of detail provided in drawings submitted in support of planning applications. They should clearly apportion costs between the different uses proposed.
- 7.43 Costs Plans should set out separate costs for:
- Preliminaries.
  - Demolition/site clearance/site preparation.
  - Base build costs.
  - Abnormal costs.
  - Onsite infrastructure and utilities.
  - Off-site infrastructure (where delivered by the developer and directly related to the scheme).
  - Contractor's overheads and profit.
  - Contingency/risk allowances.
- 7.44 There should be a clear alignment between a development's specification, assumed build costs, and development values, and there should be consistency with comparable sites. Wherever possible, Cost Plans should include benchmarking

against other similar projects as well as sources such as the Build Cost Information Service.

- 7.45 The Council will instruct cost consultants to rigorously assess scheme proposals and verify whether costs are appropriate. Consideration will also be given to scheme design and programme, and whether development costs could be reduced as part of a value engineering or cost-reduction exercise.

#### Professional Fees

- 7.46 Professional fees are generally expressed as a proportion of construction costs and should take the scale and nature of the scheme into account. Economies of scale would generally be expected to apply to larger schemes, and a lower allowance may be justified where a scheme is repetitive in terms of design. Higher allowances may be appropriate for particularly complex schemes, such as where listed or historic buildings are being redeveloped. Where possible, professional fees should be benchmarked against similar completed schemes.

#### Disposal Costs

- 7.47 Sales agent, letting agent, marketing and legal fees should be based on the likely costs of disposing of the scheme. They should reflect economies of scale and discounts that would apply where an agent or solicitor is appointed to manage the disposal of a substantial number of units. It is expected that where high marketing costs are adopted that this would result in improved sales rates assumptions.

#### Construction Programme

- 7.48 FVAs should clearly set out any pre-construction period and the construction programme length assumed. The timing of construction costs should be evidenced, based on a detailed construction programme prepared with reference to similar schemes. The payment of financial planning obligations should reflect local payment timing requirements, and the payment of the Community Infrastructure Levy should account for scheme phasing and the Council's Instalments Policy.

#### Finance Costs

- 7.49 Finance costs should be justified according to the specific development proposal. Evidence should be provided in respect of:
- The likely interest rate throughout the development period, taking into account the type of development and the likely structuring of finance for the scheme.
  - The cash flow including assumptions on the timing of income and expenditure, including any pre-sales or forward-funding of the development.

#### Planning Obligations and Community Infrastructure Levy ("CIL")

- 7.50 Applicants and landowners should take account of relevant planning obligations and CIL likely to be payable in respect of the scheme.
- 7.51 Planning obligations should be determined in accordance with the Development Plan and related guidance. These should be secured in the S106 agreement.

- 7.52 CIL liabilities assumed in an appraisal should take account of the Council's CIL Charging Schedule and Instalment Policy, as well scheme phasing, reductions for occupied floorspace and affordable housing relief under the CIL Regulations.

#### Other Development Costs

- 7.53 Land assembly costs can be included in FVAs for estate-regeneration schemes, including the buy-back of residential leasehold interests, and tenant and leaseholder compensation costs where it is likely that a compulsory purchase order will be required. These should be clearly itemised and evidenced.
- 7.54 On schemes where there are existing non-residential uses, the cost of acquiring leases cannot be included as this value is generally accounted for in the BLV. However, tenant compensation for the loss of premises under the Landlord and Tenant Act 1954, where the lease has protection, may be appropriate if fully evidenced. Compulsory purchase compensation such as disturbance or home loss payments can be included where appropriate.
- 7.55 Rights of Light costs may be included as development costs where fully evidenced and it is demonstrated that these are likely to be incurred.

#### Developer's Return

- 7.56 The primary approach to developer return should usually be a proportion of the scheme's GDV. If an 'Internal Rate of Return' ("IRR") approach is considered as a measure of profitability on larger, or longer-term, or phased schemes, a full justification must be provided for the assumed development programme and the timing of cost and value inputs. IRR should always be evidenced and cross-checked against other measures of developer return including the return as a percentage of GDV.
- 7.57 Developer return allowances in FVAs should reflect the minimum return required for a reasonable developer to bring forward a scheme for development. They should take account of the individual characteristics of the scheme, including the type of development proposed, the likely approach to delivery and funding, and whether it provides pre-sold/ pre-let accommodation. A rigid approach to developer return should be avoided.
- 7.58 The level of return required for affordable housing should reflect significantly lower levels of risk when compared to market tenure residential units.
- 7.59 Where a land use in a scheme is proposed to be retained that would accommodate existing occupiers, the required return for this element of the scheme should reflect the more limited risk associated with the sale or letting this floorspace. For example, where a supermarket is being redeveloped to include a housing scheme and a replacement store, a lower return could be expected for the replacement store.
- 7.60 Returns for residential investment proposals should reflect the lower levels of risk as longer term rental products as well as the delivery models assumed. For example, a forward-funded scheme might require a different return to a scheme assumed to be sold at or following completion.

#### Benchmark Land Value

- 7.61 The process for establishing an appropriate BLV for an FVA is important because it represents the threshold for determining whether a scheme is viable or not. A development is typically deemed to be viable if the RLV is equal to or higher than the BLV.
- 7.62 Under no circumstances should price paid be used as the basis for the BLV. This is because if it is assumed that the granting of planning permission will increase the value of the site, but the costs of fully complying with policy requirements are not reflected in the price paid, the BLV will be inflated. If the price paid was then included in the assessment as the BLV, or as a development cost, this would make it inevitable that planning requirements would be found to make developments unviable. This is known as the ‘circularity issue’, which has previously been found to undermine the implementation of Development Plan policies and the ability of planning authorities to deliver sustainable development.
- 7.63 The primary approach to determining the BLV is the Existing Use Value (“EUV”) plus a landowner’s premium which should reflect the circumstances of the site. The principle of this approach is that a landowner should receive at least the value of the land in its ‘pre-permission’ use, which would normally be lost when bringing forward land for development.
- 7.64 The EUV should be fully justified based on the income-generating capacity of the existing use, with reference to comparable evidence on rents, yields and capital values that exclude any hope value associated with a potential redevelopment of the comparable site. This evidence should relate to sites and buildings of a similar condition and quality. Applicants should provide a schedule of condition (where requested) and photographs of existing buildings in order to facilitate an accurate assessment.
- 7.65 Any premium or uplift over EUV should be fully justified, reflecting the circumstances of the site. For a site that does not meet the requirements of the landowner or creates ongoing liabilities/costs, a lower or no premium would be expected.
- 7.66 The level of premium can be informed by BLVs that have been accepted for planning purposes on other comparable policy-compliant schemes and sites, where determined on an EUV-plus basis that is consistent with this guidance. Historic BLVs for non-policy-compliant developments cannot be used.
- 7.67 Alternative Use Values (“AUV”) are assessments of land value for an alternative development proposal using the residual valuation method. Caution should be applied when considering AUVs. Extant consents that could be implemented and delivered can be used as AUVs, subject to any future changes introduced by the government that may affect their applicability.
- 7.68 Other alternative schemes are able to be used as AUVs, but only where it is demonstrated, to the Council’s satisfaction, that the alternative scheme would gain planning permission. These alternative schemes should reflect the full costs of policy compliance, including affordable housing at the levels set out in the Development Plan.
- 7.69 Where an AUV is used, the applicant should provide a detailed alternative proposal based on architect’s plans and floorspace schedules, and a detailed Cost Plan with a similar level of detail to the Cost Plan for the proposed scheme. Detailed

supporting evidence should be provided in the inputs and assumptions. The Council will robustly assess the information and evidence submitted. The applicant should also explain why the proposed scheme is being pursued rather than the alternative scheme.

- 7.70 If an applicant proposes to use the refurbishment of existing buildings as a basis for establishing BLV, this should be assumed to be an AUV and assessed accordingly with supporting evidence of the refurbishment costs. No premium should be added to an AUV. An AUV should not be used to determine a premium above EUV.
- 7.71 Land transactions can only be used as a cross-check to other evidence and should not be used in place of BLV. If land transactions are used in this way, they must fully reflect the cost of policy compliance, including for affordable housing at the levels set out in the Development Plan or be adjusted accordingly.

### **Reporting and Interpreting the Results of an FVA**

- 7.72 The results of an FVA will typically either be in the form of an RLV or a residual developer's profit. FVAs should clearly set these out alongside either the BLV or target developer's return as appropriate, to identify the extent to which the proposed scheme is viable.
- 7.73 Residual valuations are highly sensitive to changes in value and cost assumptions and as such should always be subject to sensitivity testing. Sensitivity testing must, as a minimum, include variation in GDV and construction costs, due to the impact of variation in these inputs on the outcomes of appraisals.
- 7.74 Assessors should undertake a 'stand back and check' exercise to consider whether the outputs of the residual valuation are realistic. This can include reviewing sensitivity testing carried out.
- 7.75 If a scheme generates a low RLV or is in deficit, the value and cost assumptions may not be realistic and/or the scheme may not be optimally designed. Where an applicant's FVA results in a substantial deficit the applicant should demonstrate how the scheme will be deliverable. This could involve providing appraisal testing that assumes growth in values and inflation in construction costs, with the rates used to be based on the best available evidence. However, where the deficit is so significant that the rate of value growth or change in costs required to achieve the BLV or target profit is unrealistic, a review of value and cost inputs in the base appraisal is likely to be required.
- 7.76 The weight to be applied to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including: whether the plan and viability evidence underpinning the plan is up to date; site circumstances including any changes since the plan was brought into force; and the transparency of assumptions behind evidence submitted as part of the viability assessment. The decision maker should consider whether the assessment and its conclusions are objective, reasonable and realistic.

## **8. Viability Review Mechanisms**

8.1 Policy H2(2)(h) of the Local Plan states that viability review mechanisms should be applied to all viability tested applications at early and late stages in the development process, and that mid-term reviews should apply in the case of longer phased schemes. This is to ensure that affordable housing delivery is maximised as a result of any future improvement in viability.

8.2 This SPD sets out key principles relating to Viability Review Mechanisms, matters that a S106 Agreement (or similar) should include, and the methodology that will generally be applied in Spelthorne. This section also refers to how viability deficits can be taken account of with regard to the methodology advised.

### **Key Principles**

8.3 Viability Review Mechanisms are secured to assess whether affordable housing contributions can be increased where viability improves and so enable the maximum level of affordable housing provision over the lifetime of a development. They provide an opportunity to achieve policy compliance and optimal public benefits by recognising the potential for changes in values and build costs between the application stage and different stages of the development programme.

8.4 Viability Review Mechanisms can help to address uncertainties that cannot be addressed as part of viability assessment exercise carried out in respect of a planning application. However, they should not be used as an alternative to a realistic assessment at application stage for viability-tested applications. Review mechanisms apply only to schemes that are viability-tested at application stage and do not reach policy-compliant affordable housing levels. They are not intended to reassess schemes that already achieve full compliance.

8.5 Where the scheme is delivered in a way that is consistent with how it was assessed at application stage, development values and development costs should be assessed on the same basis in review mechanisms as at application stage. Where this is not the case, appropriate adjustments may be required. This is to ensure that viability reviews are equitable and robust.

8.6 Viability Review Mechanisms apply where a development scheme proposed in a planning application attracts a policy requirement to provide affordable housing and where the affordable housing proposed does not comply with the affordable housing policies in the Local Plan. They will typically be secured by way of a planning obligation in a S106 Agreement. When drafting provisions relating to review mechanisms in a S106 Agreement, applicants should reflect any standard template clauses published or used by the Council.

8.7 The primary approach to review mechanisms set out in this document is a formula-based approach – the formulas to be used are set out later in this section. The formula-based approach assesses changes in development values and build costs, which are the most significant variables within an assessment. This avoids the need for a full reassessment of viability and reduces information requirements, enabling a shorter review assessment period that has less scope for disagreement and conflict.

- 8.8 The Council, at their discretion, may require a full reassessment that considers all values and costs at the time of the review, except for developer return and BLV, which are expected to be determined at application stage.
- 8.9 Reviews involving full reassessments are more likely to be suitable for the following types of development proposals:
- Residential investment schemes, such as Build to Rent: This is because several types of disposals could inform the reviews, all of which can produce different scheme values depending on the timing of the sale and the obligations and risks adopted by the parties. Formula based reviews refer back to a scheme value derived through a specific methodology at application stage so are not typically able to be compatible with values generated based on different types of transaction. The S106 Agreement for these schemes should include provisions for, where necessary, adjusting the developer return to reflect the delivery model used for the review stage assessment. Where the delivery model is not known, the review should be carried out on the same basis as the application stage assessment.
  - Schemes where there is exceptional and significant uncertainty about some elements of value or costs, or where a development may be delivered in a different way to that tested at application stage. It may be particularly appropriate on larger, longer-term schemes, or outline applications where less detail is available at application stage, and/or where the Council agrees that an Internal Rate of Return is an appropriate profit metric.
- 8.10 Affordable housing requirements are applied where they are required to make an application acceptable in planning terms. Viability Review Mechanisms are not a tool to protect a return to the developer and as such should not be used to reduce the base level of affordable housing contributions, additional affordable housing secured in an earlier review or other obligations which are required as part of the planning permission.
- 8.11 Although securing additional affordable housing where a surplus arises in a review is the priority, at the Council's discretion, the review mechanism may also be used to improve the affordability of secured affordable homes, particularly through the provision of additional Social/Affordable Rent housing, or contribute to other policy requirements which may not have been viable at application stage.

### **Early Stage Reviews**

- 8.12 The viability of a scheme is more likely to change when the period between the grant of consent and when a development is built out is longer. In view of this, Early Stage Reviews are to only be triggered where a substantial implementation of the scheme has not been achieved within two years of the planning permission, or a period agreed with the Council. This can incentivise the commencement and delivery of development.
- 8.13 Substantial implementation should reflect a reasonable level of progress by that stage in the programme. The definition of substantial implementation will be set out in the S106 agreement, and should comprise the completion of all ground-preparation works, the foundations for the core of the development, and construction of the ground or first floor. If substantial implementation is achieved within the agreed period, the review will not be triggered.

- 8.14 Provisions that seek to delay the trigger date for an Early Stage Review must not be included in the S106 agreement, as this review is intended to secure additional affordable housing where viability allows – regardless of the reason development may have been delayed.
- 8.15 Where the Early Stage Review is triggered, the review itself will take place at the point that substantial implementation is actually reached. Where practical and feasible, additional affordable housing arising from the Early Stage Review should be provided on-site prior to occupation of a specified proportion of market units. Information that identifies which homes will be provided as additional affordable units should be submitted to the Council for approval.
- 8.16 Where an early stage review identifies a surplus that is insufficient to support on-site affordable housing, this should be paid to the Council as a financial contribution following the review, and prior to the occupation of a specified proportion of market units (for example, 50%). Where this is the case, the payment amount can be included as a cost in subsequent viability reviews.

### **Late Stage Reviews**

- 8.17 Late Stage Reviews should take place close to the point at which the development scheme is fully occupied. The benefit of this approach is that the review can be substantially based on actual values achieved and costs incurred, meaning they are able to be more accurate. Setting the late stage review trigger prior to full occupation of a development scheme helps to ensure that the review itself, and the payment of additional contributions that arise, can be enforced.
- 8.18 Late Stage Reviews for shorter term schemes should be triggered on occupation of 75 per cent of the homes in the scheme, with an occupation restriction of no more than 90 per cent of homes applying until the review is resolved and any surplus arising is paid to the Council.
- 8.19 With respect to longer term and phased schemes, the Late Stage Review should take place on occupation of 75 per cent of homes in the final phase or plot; or at an alternative level of progress (which may include at occupation of a specific number of units) as determined by the Council.
- 8.20 For Late Stage Reviews on residential Build for Sale schemes, it will generally be acceptable for any surplus arising to be provided in the form of a financial contribution rather than through on-site provision. This is to reflect the potential practical implications of delivering an increased amount of affordable housing on-site at a late stage in a scheme. Residential investment schemes that are able to provide intermediate / affordable private rent housing blended within the development scheme are able to provide additional affordable housing in the development scheme.
- 8.21 For Late Stage Reviews it may be acceptable for an element of surplus return to be retained by the developer. No surplus return retained by the developer for any review should exceed 40 per cent of the surplus, with the remainder to be used by the Council for additional affordable housing.

### **Mid-Stage Reviews**

- 8.22 Mid-Stage Reviews should apply to longer phased scheme where a policy compliant level of affordable housing is not achieved.

- 8.23 Mid-Stage Reviews take place throughout the course of a development at points to be agreed with the Council. These should take into account actual values and costs for earlier phases, and estimated figures for subsequent phases. Unlike Early Stage Reviews, which may not take place if the agreed level of progress is achieved, Mid-Stage Reviews always take place when the delivery of the development has reached a specific point. Any surplus amount identified through the review should be used to provide additional on-site affordable housing.
- 8.24 More than one Mid-Stage Review may be required depending on the size of the scheme and the number of phases, plots or buildings. It is generally appropriate for schemes proposing 500 to 999 homes to be subject to one Mid-Stage Review, whereas schemes of 1,000 homes should generally be subject to at least two of these reviews. The number of Mid-Stage Reviews and the trigger points will be agreed on a case by case basis at application stage, reflecting phases, plots or reserved matters sequencing.
- 8.25 For outline or hybrid schemes it may be appropriate for reviews to take place as part of reserved matters applications, to enable affordable housing to be included within the design of the relevant phase or future phases. It may also be appropriate to link Mid-Stage Reviews to the delivery or occupation of an agreed number of units.
- 8.26 Where a Mid Stage Review identifies a surplus that is insufficient to support on-site affordable housing, this should be paid to the Council as a financial contribution following the review, and prior to the occupation of a specified proportion of market units. Where this is the case, the payment amount can be included as a cost in subsequent viability reviews.

### **Section 106 Agreements**

- 8.27 Whenever review mechanisms are used, the S106 (or similar legal agreement) should, in addition to matters set out above, do the following:
- Identify the point(s) at which the review(s) should be carried out, in line with the guidance set out above.
  - Ensure that the application and review-stage development value figures include any public subsidy that is available at the time that they are assessed.
  - Set out the basis for determining whether a 'surplus return' is generated over and above the required developer's return necessary for a scheme to be deemed viable.
  - Include the developer's return agreed by the Council at application stage. The required developer's return should not be applied to any public subsidy available to the scheme.
  - Confirm the scope of the review(s) in respect of viability inputs and ensure that this will be based on the most robust and up-to-date information available which will generally be the price paid or market value of the homes, and the actual build costs incurred where available.
  - Developer overheads should be excluded from reviews, but where a scheme is delivered directly by the developer as the main contractor, a reasonable

allowance for contractor overheads and preliminaries can be included within build costs.

- Ensure that where actual build costs are used, no contingency is applied.
- Where a formula based approach is used, ensure that the review is carried out on the same basis, and with the same approach to inputs, as the application stage viability assessment, with any arrangements for appropriate adjustments clearly set out. Adjustments may include, for example, making allowances for different assumptions on profit and finance if a scheme that was assessed as Build for Sale comes forward as Build to Rent, or where a residential investment typology (such as Build to Rent) is delivered using a different model than that assessed at application stage.
- Set a 'cap' on the affordable housing provision that will be sought through the reviews, which mirror the policy compliant requirement applicable to the site.
- Ensure that a monetary cap for additional affordable housing at a Late Stage Review is not secured, as this may not equate to the shortfall against a policy target at the time of review.
- Make provision for the full costs of the Council in negotiating, undertaking and assessing a viability review to be borne by the developer.
- Make provisions for appropriately reporting affordable housing provision, including that provided by the way of Review Mechanisms, as well as any Financial Contributions secured, to the Council in line with relevant formal reporting processes.
- Set out how and where the developer should submit Viability Review Mechanism information to the Council when they are triggered.

### **Review Formulas**

#### Formula 1 – Early Stage Viability Review

- 8.28 This formula identifies whether a contribution is payable to the Council through an Early Stage Viability Review.

#### **Formula 1: Early Stage Review**

**X = Surplus Return available for Additional Affordable Housing Units**

$$X = ((A - B) - (C - D)) - P$$

A = Estimated GDV of development as determined at the time of review (£)

B = Application-stage GDV of development as determined at the grant of planning permission (£)

C = Estimated build costs as determined at the time of review (£)

D = Application-stage build costs as determined at grant of planning permission (£)

P = (A - B) \* Y – Developer return on change in GDV (£)

Y = Developer return as a percentage of GDV as determined at the application stage (per cent)

- 8.29 Inputs A and C are determined as part of the Early Stage Review assessment process, whereas inputs B and D are to be determined through the viability assessment process at application stage.
- 8.30 Inputs A and B should include any public subsidy known to be available at the time the input is considered, although the profit allowance (component P) should not be applied to any public subsidy that makes up these GDV figures.
- 8.31 Where component P is lower than zero, which arises where the GDV reduces between application and review stages, it should equate to zero. Otherwise, this component could result in a contribution arising where the viability of the scheme deteriorates between application and review stage.
- 8.32 Where the review applies to a residential investment scheme, such as Build to Rent, the GDV components (A and B), should equate to the Net Development Value of the asset, i.e. should exclude purchaser's costs.

Formula 2 – Additional Affordable Housing Requirement

- 8.33 This formula identifies the extent of additional on-site affordable housing that should be provided as a result of a surplus arising from either an Early or Mid-Stage Review. It allocates a proportion of the surplus to different affordable tenures based on the Local Plan Tenure Split. It calculates the additional affordable floorspace to be provided based on difference in average value of the market housing and the relevant affordable housing tenure.

**Formula 2: Early/ Mid-Stage Review Additional Affordable Housing Requirement**

**X = Additional Social Rent/ Affordable Rent housing requirement (square metres)\***

$$X = ((E * F) \div (A - B))$$

**Y = Additional Intermediate housing requirement (square metres)\***

$$Y = ((E * G) \div (A - C))$$

A = Average value of market housing per m<sup>2</sup> (£)

B = Average value of Social Rent/ Affordable Rent housing per m<sup>2</sup> (£)\*

C = Average value of Intermediate housing per m<sup>2</sup> (£)\*

D = Surplus return available for additional affordable housing (as determined in Formula 1 (Early Stage Review) or Formula 5 (Mid-Stage Review) (£)

E = Percentage of surplus return available for additional affordable housing to be used for Social Rent/ Affordable Rent housing (per cent)

F = Percentage of surplus return available for additional affordable housing to be used for Intermediate housing (per cent)

\*delete as relevant based on tenures required

- 8.34 With respect to components B, C, E and F, the affordable tenure they assume should represent the most appropriate tenure based on discussions with the Council.
- 8.35 Components E and F should accord to the relevant part of the Local Plan tenure split. Due to the substantial need for Social and Affordable Rent accommodation, where this form of affordable housing proposed in the application does not meet the tenure split proportion for this tenure, component F can be increased above the tenure split allowance in the Local Plan to make up for the shortfall in this tenure.
- 8.36 The outputs of this formula are the number of square metres to be provided as additional affordable housing. These should be applied in the development scheme in a pragmatic way and with reference to the Council's affordable housing bedroom size mix.

#### Formula 3 - Late Stage Viability Review

- 8.37 This formula identifies whether a contribution is payable to the Council through a Late Stage Viability Review.

#### **Formula 3: Late Stage Review Contribution**

##### **X = Late Stage Review Contribution**

$$X = (((A + B) - C) - ((D + E) - F) - P) \times 0.6$$

A = GDV achieved on occupation of 75 per cent of residential units from parts of the development disposed of and the value of other income receipts (£)

B = Estimated GDV for parts of the development that are yet to be disposed of and other income sources (£)

C = Application-stage GDV determined as part of the assessment of viability at the grant of planning permission or, if a surplus arose in any previous review, the total GDV in the last review where a surplus was identified, minus the surplus in that review (£)

D = Build costs incurred at the time of review (£)

E = Estimated build costs of development yet to be carried out as determined at the time of review (£)

F = Application-stage build costs determined as part of the assessment of viability at application stage or, if a surplus arose in any previous review, the total build costs in the last review where a surplus was identified (£)

P = (A + B - C) \* Y - developer return on change in GDV (£)

Y = Developer return as a percentage of GDV as determined at the time planning permission was granted (per cent)

- 8.38 The component “(A + B) – C” reflects the change in GDV from the application stage (or a previous review if a surplus was identified) to the Late Stage Review, so takes account of where an Early or Mid-Stage Review is triggered and finds a surplus.
- 8.39 As with Formula 1 above:
- The GDV related Inputs (A, B and C) should include any public subsidy known to be available at the time the input is considered, although the profit allowance (component P) should not be applied to any public subsidy that makes up these GDV figures.
  - Where component P is lower than zero, which arises where the GDV reduces between application and review stages, or between a review and a later one, it should equate to zero. Otherwise, this component could result in a contribution arising where the viability of the scheme deteriorates between application and review stage.
  - Where the review applies to a residential investment scheme, such as Build to Rent, the GDV components (A, B and C), should equate to the Net Development Value of the asset, i.e. should exclude purchaser’s costs.
- 8.40 This formula contains a split of any surplus arising between the Developer and the Council. This is to ensure that a developer remains incentivised to maximise value from a scheme. The split is 60/40 with 60 per cent of surplus profit used for additional affordable housing.
- 8.41 Where the whole of or part of the scheme is delivered as Build to Rent, but this has been assessed at application stage as Build for Sale:
- The GDV-achieved figure (component A of the formula) should be adjusted to take account of the following:
    - The timing of any receipt and impact on developer’s finance costs.
    - Any difference in profit requirement between the residential typology assumed at application stage and the residential typology delivered and transacted. Component A should be increased by the appropriate profit differential to reflect the lower risk associated with whole or part of the scheme being sold in a single transaction.
  - The developer return allowance (component Y of the formula) should also be adjusted to reflect an appropriate allowance given the revised residential typologies assumed.

#### Formula 4

- 8.42 Contributions payable under a Late Stage Review are capped at a monetary amount equivalent to a policy compliant affordable housing quantum and tenure split. This formula identifies the maximum affordable contribution payable as a result of a Late Stage Review. It does this by identifying the affordable housing shortfall

against policy compliance and by calculating what financial contribution would be required to make up that shortfall.

**Formula 4: Late Stage Review Cap**

**X = Late Stage Review Cap**

$$X = (((A * D) - (B * D)) * E) + (((A * D) - (C * D)) * F)$$

A = Average value of market housing per m<sup>2</sup> (£)

B = Average value of Social Rent/ Affordable Rent housing per m<sup>2</sup> (£)\*

C = Average value of Intermediate housing per m<sup>2</sup> (£)\*

D = Average number of net residential square metres in scheme per home (m<sup>2</sup>)

E = Social Rent/ Affordable Rent shortfall on-site (homes)\*  
(determined at application stage or as updated following previous review)

F = Intermediate housing shortfall on-site (homes)\* (determined at application stage or as updated following previous review)

\* delete as relevant based on tenures required

- 8.43 The initial part of this formula (prior to the “+” sign) is calculating the financial equivalent of the shortfall in Social Rent/ Affordable Rent housing, whereas the latter part is calculating the financial equivalent of the shortfall in Intermediate housing.
- 8.44 Component D should be specified in the formula in the S106 agreement wherever possible and be based on the total net area of the total residential units divided by the number of homes in the scheme.

**Formula 5 – Mid-Stage Viability Review**

- 8.45 This formula identifies whether a contribution is payable to the Council through a Mid-Stage Viability Review. It identifies a surplus available for additional onsite affordable housing but uses actual values and costs for completed parts of the development at the time of the review and estimated figures for the rest of the scheme.
- 8.46 It determines whether any change in development values and/or build costs has occurred since the previous viability review was carried out, or where no previous review was triggered, the change in development values and/or build costs since the application stage.

**Formula 5: Mid-Stage Review**

**X = Surplus return available for additional on-site affordable housing**

$$X = (((A + B) - C) - ((D + E) - F) - P)$$

A = GDV achieved up to the point of the review (£)

B = Estimated GDV for parts of the development that are yet to be disposed of and other income sources (£)

C = Application-stage GDV determined as part of the assessment of viability at the grant of planning permission or, if a surplus arose in any previous review, the total GDV in the last review where a surplus was identified, minus the surplus in that review (£)

D = Build costs incurred at the time of review (£)

E = Estimated build costs of development yet to be carried out as determined at the time of review (£)

F = Application-stage build costs determined as part of the assessment of viability at application stage or, if a surplus arose in any previous review, the total build costs in the last review where a surplus was identified (£)

P = (A + B - C) \* Y - developer return on change in GDV (£)

Y = Developer return as a percentage of GDV as determined at the time planning permission was granted (per cent)

8.47 The component “(A + B) – C” reflects the change in GDV from the application stage (or a previous review if a surplus was identified) to the Mid-Stage Review, so takes account of if an Early or previous Mid-Stage Review is triggered and finds a surplus.

8.48 As with Formulas 1 and 3 above:

- The GDV related Inputs (A, B and C) should include any public subsidy known to be available at the time the input is considered, although the profit allowance (component P) should not be applied to any public subsidy that makes up these GDV figures.
- Where component P is lower than zero, which arises where the GDV reduces between application and review stages, or between a review and a later one, it should equate to zero. Otherwise, this component could result in a contribution arising where the viability of the scheme deteriorates between application and review stage.
- Where the review applies to a residential investment scheme, such as Build to Rent, the GDV components (A, B and C), should equate to the Net Development Value of the asset, i.e. should exclude purchaser’s costs.

- 8.49 In addition, in line with Formula 3, where the whole of or part of the scheme is delivered as Build to Rent, but this has been assessed at application stage as Build for Sale:
- The GDV-achieved figure (component A of the formula) should be adjusted to take account of the following:
    - The timing of any receipt and impact on developer's finance costs.
    - Any difference in profit requirement between the residential typology assumed at application stage and the residential typology delivered and transacted. Component A should be increased by the appropriate profit differential to reflect the lower risk associated with whole or part of the scheme being sold in a single transaction.
  - The developer return allowance (component Y of the formula) should also be adjusted to reflect an appropriate allowance given the revised residential typologies assumed.
- 8.50 Where this formula identifies a surplus, Formula 2 is to be used to convert it into additional on-site affordable housing.

#### **Viability Deficits and Review Mechanisms**

- 8.51 As set out in section 7, applicants should demonstrate that development proposals are deliverable and that viability assessments are realistic. If a deficit and/or a shortfall in land value or developer's return is assessed by an applicant this may indicate that development value has been understated, development costs have been overstated and/or the scheme has been sub-optimally designed.
- 8.52 Deficits should not normally be accounted for in review mechanisms, which would reduce the likelihood of delivery of additional affordable housing over the lifetime of the development. As such, these should only be allowed exceptionally and where agreed by the Council.
- 8.53 The extent of any deficit should be determined by the Council and reflected in the S106 Agreement. Viability deficits may be reduced or overcome through reductions in build costs and through increases in development values. To reflect this a Breakeven Appraisal can be undertaken at application stage to assess the level of GDV and build costs at which the scheme is viable.
- 8.54 In order that both the build costs and the GDV are adjusted to arrive at the breakeven position, the build costs should first be reduced by a reasonable percentage of the deficit to reflect potential cost savings. The GDV should then be increased until the appraisal reaches a breakeven position. The updated 'Breakeven GDV' and the 'Breakeven Build Cost' should replace the application-stage GDV and build-cost figures in the formulas.
- 8.55 Improvements in viability identified in review mechanisms will first be applied to reduce or eliminate any identified deficit before any additional affordable housing or financial contribution is sought. This approach recognises developer risk at application stage, encourages higher upfront affordable housing offers, and ensures that only genuine improvements in viability result in uplifted affordable housing provision. No deficit additional to the one determined by the Council will be recognised in any review.

## 9. 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 of the definitions below. 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.
Affordable Rent	Low Cost Rent affordable housing for rent which meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Affordable Rent, it is charged at up to Local Housing Allowance rates and is at least 20% below local market rents (including service charges where applicable); (b) the landlord is 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.
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.
First Homes	An intermediate ownership affordable housing product which provides 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 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. Available for households with a gross income of up to £80,000 and subject to other local and national eligibility criteria.
Forward-funded	Transaction where a funder acquires the scheme from a developer, prior to or during the asset being constructed and the developer continues to deliver the scheme until practical completion.

Grey belt	For the purposes of plan-making and decision-making, 'Grey Belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey Belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.
Gross development value (GDV)	Combined market value of the proposed development before allowances for purchaser's costs.
Hope value	An element of market value in excess of the existing use value (EUV), reflecting the prospect of some more valuable future use.
Intermediate Housing	An overarching term used to describe affordable housing provided for key workers or middle income households who neither own a home nor have the means to buy a market home. Includes Intermediate Rent, and intermediate ownership products Shared Ownership and First Homes. Allocations are prioritised for households with a local connection to Spelthorne that include at least one person who lives or works in Spelthorne at the time of their application.
Intermediate Rent	An intermediate affordable housing discounted market rent product, provided in perpetuity, based on median incomes for households who are not eligible for Low Cost Rent housing but cannot afford market rent. This is also known as affordable private rent in the context of Build to Rent development. Intermediate rent can also be provided as a rent-to-buy product which enables the household to save towards a deposit to purchase the home as a shared ownership property after five years. Total housing costs including rents and service charges should not exceed the lower of the relevant LHA for the relevant size of property and 80% of the market rent for an equivalent property. In some forms this can include pathways to ownership, such as shared ownership. Available for households with a maximum gross income of £65,000.
Internal rate of return (IRR)	A developer return metric. Discount rate (expressed as a percentage) at which the net present value of a cash flow at is equal to zero.
Investment approach	Property valuation method designed to assess the potential return on investment through ongoing income from a property.
Investment yield	Usually calculated as a year's rental income as a percentage of the value of the property.

Key worker	An essential worker who is eligible for intermediate (or low cost rent) housing, and occupies a role and qualifies for housing as set out in the Council's Key Worker Housing Policy (or as updated in this guidance). <sup>32</sup>
Local Housing Allowance (LHA)	The maximum amount of housing benefit or Universal Credit housing element that can be paid for private rented homes, based on the 30 <sup>th</sup> percentile of local market rents in a Broad Rental Market Area. Applies to private rented sector tenants but is also used as a measure of maximum rental cost for some affordable housing products.
Local housing need	The number of homes identified as being needed through the application of the standard method set out in national planning practice guidance.
Local Plan	A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community.
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.
Low Cost Rent	An overarching term used in this guidance to describe affordable housing provided by a Registered Provider for households with low incomes in greatest housing need, comprising of Social Rent and Affordable Rent, which are allocated to households on the Council's Housing Register.
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.
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.
Major development	For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares

<sup>32</sup> Spelthorne Key Worker Housing Policy

	or more. For non-residential development it means additional floorspace of 1,000m <sup>2</sup> 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.
Market value	The price at which the sale of the relevant property interest would have been completed unconditionally for cash consideration based on detailed comparable market evidence assuming: <ul style="list-style-type: none"> <li>(a) a willing seller and a willing buyer</li> <li>(b) that, prior to the date of valuation, there has been a reasonable period of not less than six months for the proper marketing of the interest (having regard to the nature of the property and the state of the market) for the agreement of the price and terms and for the completion of the sale</li> <li>(c) that no account is taken of any additional bid by a prospective purchaser with a special interest</li> <li>(d) that both parties to the transaction have acted at arm's length.</li> </ul>
Net development value (NDV)	The GDV less assumed purchaser's costs.
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.
Purchaser's costs	Costs of acquiring a property including (if appropriate) stamp duty and acquiring agents/ legal fees.
Registered Provider	A registered provider of social housing is an organisation that is officially listed and regulated to offer low-cost housing to people in need. These providers must meet specific standards set by the Social Housing Regulator, including consumer standards, tenant involvement, and community standards. Registered providers can include local authorities and private registered providers, and they are required to publish annual reports detailing their compliance with these standards.
Residual developer's return	Amount remaining once the costs of development of a project including an appropriate land value are deducted from its NDV.
Residual land value (RLV)	Amount remaining once the costs of development of a project including an appropriate profit are deducted from its NDV.
Residual valuation method	Valuation/appraisal of a development based on a deduction of the costs of development and either profit or land cost from the anticipated proceeds.

Rural exception sites	Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.
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.
Sensitivity testing	Series of tests that assess the impact on the residual appraisal of changes to one or more inputs e.g. sales values, build costs, etc. This is normally carried out on a current day basis in addition to growth testing.
Shared Ownership	An intermediate affordable housing ownership product that allows individuals to buy a share of a property and pay rent on the remaining share. Typically, this is between 10% and 75% of the property's value, with a minimum deposit of 5%. Intended to help those who cannot afford the full deposit and mortgage payments for a home that meets their needs. Shared ownership homes are usually leasehold properties. The share owned can be increased through a process called staircasing. Available for households with a gross income of up to £80,000 and subject to other local and national eligibility criteria. Total housing costs should not exceed 40% of net income for the maximum household income.
Social Rent	Low Cost Rent affordable housing that meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent; (b) the landlord is 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. It is the most affordable tenure of rented housing.
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.

Target return	Minimum rate of return/ profit required by a reasonable developer for the development to proceed considering its risk, expressed as either a simple ratio of GDV/cost or as an annual return over the development period (IRR).
Value engineering	Review of build costs by developer's professional team to see if a more cost-effective solution exists that will achieve the same project objectives including development value.
Viability review mechanisms	A review of development viability included in a S106 agreement enabling the reassessment of development viability after permission has been granted. These reviews occur at an early, mid and late stage in the development process, and address uncertainties in the application-stage assessment of viability to enable the maximum level of affordable housing provision and policy compliance over the lifetime of a development.

## 10. Appendix A: Financial Contributions in Lieu of On-site Affordable Housing – Worked Examples

Below are two worked examples demonstrating how a financial contribution would be calculated using the methodology set out in this SPD.

All assumptions and inputs are indicative and are provided solely for the purposes of these worked examples.

### Worked Example 1

#### Scenario/Assumptions

The application is for 100 Build for Sale C3 residential homes on Brownfield Land within the Spelthorne Local Authority area.

Evidence submitted by the applicant that it is not feasible to provide the affordable housing on or off-site, has been accepted by the Council.

A viability assessment exercise has identified that 25% affordable housing represents the maximum viable amount, with this reflecting a tenure mix of 75% Social Rent, 25% Intermediate Rent units.

The relevant Net Sales Areas of the scheme assuming on-site affordable provision are set out below, with the quantum of affordable housing floorspace identified as the maximum viable amount through the viability assessment process:

- Market Tenure Housing: 5,250 Sq. M
- Social Rent Affordable Housing: 1,312.5 Sq. M
- Intermediate Rent Housing: 437.5 Sq. M
- Total Floorspace: 7,000 Sq. M
- Total Affordable Housing Floorspace: 1,750 Sq. M

The contribution payable is calculated by applying the following formula:

$$X = ((A - B) \times C) - D - E$$

X = the financial contribution (£).

A = the market value of a square metre of floorspace in the development.

B = the value of affordable housing per square metre of floorspace<sup>33</sup>.

C = the number of square metres of affordable housing floorspace established as the maximum viable amount of affordable housing through the viability assessment process.

D = Net increase in CIL chargeable amount arising from the provision of additional market units

E = Additional sales/marketing fees relating directly to the disposal of the additional market housing units

The approach to deriving each of the components of the formula, and the corresponding calculation using the formula, is set out below:

---

<sup>33</sup> Reflecting the tenure split and unit size mix set out in the Local Plan or subsequent affordable housing need evidence produced by or on behalf of the Council.

#### Component A - the market value of a square metre of floorspace in the development

Through the viability assessment process, a value of £6,000 per sq. m for the proposed floorspace has been agreed.

#### Component B - the value of affordable housing per square metre of floorspace

Through the viability assessment process, a value of £2,000 per sq. m for the proposed Social Rent floorspace, and a value of £3,500 per sq. m for the proposed Intermediate Rent Floorspace, has been agreed.

This component represents the blended value of the affordable housing assumed which is calculated as follows:

Social Rent:  $75\% \times £2,000 = £1,500$

plus

Intermediate Rent:  $25\% \times £3,500 = £875$

Equals

$£2,375 = \text{Component B}$

#### Component C - the number of square metres of affordable housing floorspace established as the maximum viable amount of affordable housing through the viability assessment process

Based on the floor areas provided in the Scenario/Assumptions section above, this component equates to 1,750.

#### Component D - Net increase in CIL chargeable amount arising from the provision of additional market units

An additional CIL liability of £350,000 was identified as being payable due to the provision of the additional market tenure units.

#### Component E = Additional sales/marketing fees relating directly to the disposal of the additional market housing units

It was agreed through the viability assessment process that additional sales and marketing costs of 2.5% of the revenue generated by the additional marketed tenure units. This equated to a monetary amount of £158,594.

#### Component X - the financial contribution (the formula applied)

$((£6,000 - £2,375) \times 1,750) - £350,000 - £158,594 = \mathbf{£5,835,156}$

### **Worked Example 2**

#### Scenario/Assumptions

The application is for 200 Build for Sale C3 residential homes on Brownfield Land within the Spelthorne Local Authority area.

Evidence submitted by the applicant that it is not feasible to provide the affordable housing on or off-site, has been accepted by the Council.

A viability assessment exercise has identified that 20% affordable housing represents the maximum viable amount, with this reflecting a tenure split of 75% Social Rent, 25% Shared Ownership units.

The relevant Net Sales Areas of the scheme assuming on-site affordable provision are set out below, with the quantum of affordable housing floorspace identified as the maximum viable amount through the viability assessment process:

- Market Tenure Housing: 12,800 Sq. M
- Social Rent Affordable Housing: 2,400 Sq. M
- Shared Ownership Housing: 800 Sq. M
- Total Floorspace: 16,000 Sq. M
- Total Affordable Housing Floorspace: 3,200 Sq. M

The contribution payable is calculated by applying the following formula:

$$X = ((A - B) \times C) - D - E$$

X = the financial contribution (£).

A = the market value of a square metre of floorspace in the development.

B = the value of affordable housing per square metre of floorspace<sup>34</sup>.

C = the number of square metres of affordable housing floorspace established as the maximum viable amount of affordable housing through the viability assessment process.

D = Net increase in CIL chargeable amount arising from the provision of additional market units

E = Additional sales/marketing fees relating directly to the disposal of the additional market housing units

The approach to deriving each of the components of the formula, and the corresponding calculation using the formula, is set out below:

#### Component A - the market value of a square metre of floorspace in the development

Through the Viability Assessment process, a value of £5,000 per sq. m for the proposed floorspace has been agreed.

#### Component B - the value of affordable housing per square metre of floorspace

Through the Viability Assessment process, a value of £1,800 per sq. m for the proposed Social Rent floorspace, and a value of £3,750 per sq. m for the proposed Shared Ownership floorspace, has been agreed.

This component equates to the blended value of the affordable housing assumed which is calculated as follows:

$$\text{Social Rent: } 75\% \times \text{£}1,800 = \text{£}1,350$$

---

<sup>34</sup> Reflecting the tenure split and unit size mix set out in the Local Plan or subsequent affordable housing need evidence produced by or on behalf of the Council.

plus

Shared Ownership: 25% x £3,750 = £938

equals

£2,288 = Component B

Component C - the number of square metres of affordable housing floorspace established as the maximum viable amount of affordable housing through the viability assessment process

Based on the floor areas provided in the Scenario/Assumptions section above, this component equates to 3,200.

Component D - Net increase in CIL chargeable amount arising from the provision of additional market units

An additional CIL liability of £750,000 was identified as being payable due to the provision of the additional market tenure units.

Component E = Additional sales/marketing fees relating directly to the disposal of the additional market housing units

It was agreed through the viability assessment process that additional sales and marketing costs of 2.5% of the revenue generated by the additional marketed tenure units. This equated to a monetary amount of £217,000.

Component X - the financial contribution (the formula applied)

$((£5,000 - £2,288) \times 3,200) - £750,000 - £217,000 = \mathbf{£7,713,000}$

## 11. Appendix B: Viability Review Mechanisms – Worked Example

Below is a worked example demonstrating how review mechanisms would be applied using the methodology set out in this SPD.

All assumptions are indicative and are provided solely for the purposes of these worked examples.

### Worked Example

#### Scenario Assumptions

A scheme of 100 Build for Sale C3 residential homes on Brownfield Land within the Spelthorne Local Authority area gained planning permission and the S106 Agreement contained provisions pertaining to Early and Late Stage Viability Reviews.

15% Affordable Housing by home was secured in the scheme with this reflecting a tenure mix of 75% Social Rent, 25% Intermediate Rent units. Information on the number of homes in the assumed scheme, as well as the policy compliant position is set out below:

<u>Table 9</u>	<b>Scheme</b>	<b>Policy Compliant</b>	<b>Shortfall</b>
<b>Total Homes</b>	100	N/A	N/A
<b>Homes - Market Tenure</b>	85	70	15
<b>Homes - Affordable Housing (Total)</b>	15	30	-15
<b>Homes - Social Rent</b>	11	23	-11
<b>Homes - Intermediate Rent</b>	4	8	-4

The following application stage viability inputs were included in the S106 Agreement:

- Application Stage GDV: £32,500,000
- Application Stage Build Costs: £22,000,000
- Target Return: 15% on GDV

In addition, the average number of sq. m net residential square metres in scheme per home (which is an input to formula 4), was included as 70.

#### Early Stage Viability Review

The assumed scheme did not reach substantial implementation by the target date of within 24 months of planning permission, so when the scheme did reach substantial implementation after 30 months, the Early Stage Viability Review was triggered.

The viability review process identified that the estimated GDV of the development had increased to £35,000,000 (from £32,500,000 at application-stage) whereas the build costs had increased from £22,000,000 to £23,500,000.

A surplus of £625,000 was identified through the application of the Early Stage Viability review formula, as follows:

<b>Early Stage Review</b>	
$X = ((A - B) - (C - D)) - P$	<b>£625,000</b>

A = Estimated GDV of development as determined at the time of review (£)	£35,000,000
B = Application-stage GDV of development as determined at the grant of planning permission (£)	£32,500,000
C = Estimated build costs as determined at the time of review (£)	£23,500,000
D = Application-stage build costs as determined at grant of planning permission (£)	£22,000,000
P = (A – B) * Y – developer return on change in GDV (£)	£375,000
Y = Developer return as a percentage of GDV as determined at the application stage (per cent)	15%

#### Early Stage Viability Review Additional Affordable Housing Requirement

Following the identification of a surplus of £625,000 in the Early Stage Review, Formula 2 was applied to identify how many additional square metres of affordable housing needed to be provided. It used the following values identified through the review process:

- Value per sq. m of Market Housing: £6,000 per sq. m.
- Value per sq. m of Social Rent housing: £2,000 per sq. m.
- Value per sq. m of Intermediate Rent housing: £3,000 per sq. m.

When applied the formula identified that an additional 117 square metres of Social Rent floorspace and 39 square metres of additional Intermediate Rent floorspace could be provided using the surplus identified, as follows:

<b>Formula 2: Early Stage Review Additional Affordable Housing Requirement</b>	
<b>X = Additional Social Rent housing requirement (square metres)</b>	
$X = ((E * F) \div (A - B))$	<b>117</b>
<b>Y = Additional Intermediate Rent housing requirement (square metres)</b>	
$Y = ((E * G) \div (A - C))$	<b>39</b>
A = Average value of market housing per m <sup>2</sup> (£)	£6,000
B = Average value of Social Rent housing per m <sup>2</sup> (£)*	£2,000
C = Average value of Intermediate Rent housing per m <sup>2</sup> (£)*	£3,000

E = Surplus return available for additional affordable housing (as determined in Formula 1 (Early Stage Review) or Formula 5 (Mid-Stage Review) (£)	£625,000
F = Percentage of surplus return available for additional affordable housing to be used for Social Rent housing (per cent)	75%
G = Percentage of surplus return available for additional affordable housing to be used for Intermediate Rent housing (per cent)	25%

Following consideration of the output of the formula, two additional Social Rent homes and one further Intermediate Rent home was provided on-site.

### Late Stage Viability Review

On occupation of 75 per cent of homes within the scheme the Late Stage Viability Review was triggered.

The viability review process identified that the combined actual and estimated GDV of the development had increased to £40,000,000 (from £35,000,000 at Early Stage Review) whereas the build costs had increased from £23,500,000 at Early Stage Review to £25,000,000.

A Late Stage Review Contribution of £1,968,750 was identified through the application of the Late Stage Viability Review formula, as follows:

<b>Formula 3: Late Stage Review Contribution</b>	
<b>X = Late Stage Review Contribution</b>	
<b><math>X = (((A + B) - C) - ((D + E) - F) - P) \times 0.6</math></b>	<b>£1,968,750</b>
A = GDV achieved on occupation of 75 per cent of residential units from parts of the development disposed of and the value of other income receipts (£)	£30,000,000
B = Estimated GDV for parts of the development that are yet to be disposed of and other income sources (£)	£10,000,000
C = Application-stage GDV determined as part of the assessment of viability at the grant of planning permission or, if a surplus arose in any previous review, the total GDV in the last review where a surplus was identified, minus the surplus in that review (£)	£34,375,000
D = Build costs incurred at the time of review (£)	£18,750,000
E = Estimated build costs of development yet to be carried out as determined at the time of review (£)	£6,250,000
F = Application-stage build costs determined as part of the assessment of viability at application stage or, if a surplus arose in any previous review, the total build costs in the last review where a surplus was identified (£)	£23,500,000

$P = (A + B - C) * Y - \text{developer return on change in GDV (£)}$	£843,750
$Y = \text{Developer return as a percentage of GDV as determined at the time planning permission was granted (per cent)}$	15%

#### Formula 4: Late Stage Review Cap

Following the identification of a Late Stage Review Contribution of £1,968,750, Formula 4 was applied to calculate whether the contribution exceeded an amount equivalent to a policy compliant contribution. It used the following values identified through the review process:

- Value per sq. m of Market Housing: £6,500 per sq. m.
- Value per sq. m of Social Rent housing: £2,000 per sq. m.
- Value per sq. m of Intermediate Rent housing: £3,000 per sq. m.
- Shortfall in Social Rent homes against policy compliance following Early Stage Review: 9.
- Shortfall in Intermediate Rent homes against policy compliance following Early Stage Review: 3.

The formula found that a contribution of £3,587,500 would mean the overall affordable housing offer would be policy compliant, as shown in the formula below:

<b>Formula 4: Late Stage Review Cap</b>	
<b>X = Late Stage Review Cap</b>	
$X = (((A * D) - (B * D)) * E) + (((A * D) - (C * D)) * F)$	<b>£3,587,500</b>
A = Average value of market housing per m <sup>2</sup> (£)	£6,500
B = Average value of Social Rent/ Affordable Rent housing per m <sup>2</sup> (£)	£2,000
C = Average value of Intermediate Rent housing per m <sup>2</sup> (£)	£3,000
D = Average number of net residential square metres in scheme per home (m <sup>2</sup> )	70
E = Social Rent shortfall on-site (homes)	9
F = Intermediate Rent housing shortfall on-site (homes)	3

As the Late Stage Review Contribution of £1,968,750 was lower than the Late Stage Review Cap of £3,587,500, the developer was liable to pay the full amount of the Late Stage Review Contribution.

## **Affordable Housing SPD Statutory Consultation Strategy**

### **Introduction**

The statutory consultation for the Affordable Housing Supplementary Planning Document (SPD) will be undertaken in accordance with Spelthorne Borough Council's Statement of Community Involvement (SCI) and the Town and Country Planning (Local Planning) (England) Regulations 2012 which set out the requirements for public participation in the preparation of SPDs. This covers how and when the Council intends to involve people, businesses and organisations in the planning process.

Ahead of, and during, the statutory consultation period, the Council will use a range of communication methods to ensure that residents, stakeholders, community organisations, businesses and statutory consultees are notified of the consultation and encouraged to provide feedback on the draft SPD.

### **Overview**

**Proposed statutory consultation:** starting on the 8 May 2026 (8/10/26)

**Duration:** 4 weeks, as required by Regulation 12(b)

**Consultation platform:** Commonplace

**Document availability:**

- Available to view online on the Strategic Planning Commonplace Engagement Hub
- Signposted on the Council website
- Hardcopies will be available in public libraries and at the Council Offices during office hours.

**Promotion of the statutory consultation will take the following forms:**

To ensure wide awareness and maximise participation, consultation promotion will include:

- **Promotion on SBC website**
  - Homepage
  - News items/ e-news
  - Press release
- **Promotion on Commonplace**
  - Regular news stories before and during the consultation
  - A step-by-step guide news story to guide people through how to respond to the consultation
- **Promotion on SBC social media steams**
  - Social Media Posts (Instagram, Facebook, X, LinkedIn etc.)
    - Reminder posts during and at the end of the consultation to highlight consultation closing soon
  - Social Media Stories (Instagram, Facebook)
    - Stories along with posts
- **Promotions at key location around Borough**
  - Posters

- Borough-wide key locations includes noticeboards across the Borough, council offices, libraries, community centres and others
- **Direct notifications (Regulation 12 statutory consultees)**
  - Emails to Residents' Associations
    - Emails during consultation with a call to action and salient points covered
  - Emails to Councillors
    - Emails before and during with a call to action and salient points covered
  - Emails to community groups and other statutory consultees
- **Promotion to staff**
  - Spelnet news
  - Page linked to the consultation on the Strategic Planning Hub on Spelnet
- **Further promotions to Members**
  - Member Briefing Note
- **Other promotions**
  - Email footers on Council emails from Planning Department

## Equality Analysis

<b>Directorate:</b> Place, Protection and Prosperity  <b>Service Area:</b> Strategic Planning	<b>Lead Officer:</b> Jane Robinson, Local Plans and Infrastructure Manager  <b>Date completed:</b> March 2026
<b>Service / Function / Policy / Procedure to be assessed:</b>  Affordable Housing Supplementary Planning Document	
<b>Is this:</b> New / Proposed <input checked="" type="checkbox"/> Existing/Review <input type="checkbox"/> Changing <input type="checkbox"/>	<b>Review date:</b>

### 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 Affordable Housing Supplementary Planning Document (SPD) provides detailed guidance to support the delivery of affordable housing within the borough and to support the effective implementation of the Spelthorne Local Plan 2024-2039/40. Supports the Council in meeting its Public Sector Equality Duty by ensuring affordable housing delivery considers the diverse needs of residents.

#### 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 - please send a copy to **Sandy Muirhead**. **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)

<p><b>What outcomes are sought and for whom?</b></p>	<p>The Affordable Housing SPD seeks to provide guidance on delivering affordable housing across different site and development types, including thresholds, tenure mix, dwelling types, sizes, and standards. The document aims to ensure more high-quality and genuinely affordable homes that meet Spelthorne’s evidenced housing need. It also aims to support households on the Housing Register, those in significant housing need, and middle-income households unable to access market housing. The SPD outcomes include securing higher levels of Social Rent, providing suitable homes for families, older people, and people with disabilities and helping the Council and Registered Providers secure high-quality, mixed and well-integrated affordable homes. Outcomes also include offering guidance to developers through clear thresholds, viability processes, and financial contribution methods and ensuring Registered Providers can effectively deliver and manage affordable homes. These outcomes are especially relevant for protected groups who are more likely to experience housing need, affordability barriers, overcrowding or limited access to suitable accommodation.</p>
<p><b>Are there any associated policies, functions, services or procedures?</b></p>	<p>The Affordable Housing SPD is associated with a range of existing policies, functions, services and procedures, including interpreting and relying on national viability guidance, definitions of affordable housing and national frameworks, including the National Planning Policy Framework (NPPF) (2024) and Draft NPPF (2025). The SPD also directly supports and provides further guidance on the Spelthorne Local Plan 2024-2039/40 (particularly Policies H1 and H2 and their supporting evidence). There are also associated evidence documents such as the</p>

	<p>Strategic Housing Market Assessment (SHMA), the forthcoming Housing and Economic Needs Assessment (HEDNA), the Council's Housing Register and the Spelthorne Design Code. Related procedures include those for viability assessments, viability review mechanisms, the application of Vacant Building Credit, , as well as processes for calculating financial contributions in lieu of on-site or off-site provision. In addition, the SPD aligns with Council functions around housing delivery, CIL regulations, engagement with Registered Providers, securing grant funding and managing Section 106 obligations to ensure affordable housing is delivered effectively. The SPD also supports compliance with the Equality Act 2010 by ensuring that affordability, tenure and housing mix considerations reflect the needs of diverse communities.</p>
<p><b>If partners (including external partners) are involved in delivering the service, who are they?</b></p>	<p>External consultants JJ Viability Consulting have supported the Council in preparing the Affordable Housing SPD. Partners may also provide equalities-related insight, including Registered Providers through anonymised lettings and demographic data. Delivery of affordable housing also involves key partners such as Registered Providers, developers, landowners and external viability consultants, alongside relevant charitable or specialist housing organisations where appropriate.</p> <p>A range of statutory consultees contributed evidence during preparation of the SPD, including Surrey County Council, neighbouring authorities, utility providers and community groups. A full consultee list is available from the Strategic Planning Team</p>

## 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?

A range of evidence already exists to inform the Affordable Housing SPD and to help understand the characteristics and needs of households who rely on affordable housing services. The SPD draws on several key datasets, including the Council's Housing Register, the SHMA, evidence prepared for the Local Plan, and the forthcoming HEDNA 2026, as well as population and affordability data, and ONS datasets referenced in the SPD. Collectively, these sources provide detailed information about local housing need, including the scale of need, the preferred tenure types, and the required mix of dwelling sizes. They particularly identify needs for Social Rent, family-sized homes and wheelchair-accessible dwellings, as well as demonstrating high levels of overcrowding, medical needs and homelessness risk.

The Housing Register provides direct and up-to-date insight into households actively seeking affordable housing. This includes data on income levels, household size and composition and the need for different bedroom numbers. It is reasonable to infer that this dataset captures a significant number of households who fall within protected equality groups e.g. older people, families with children, single-parent households, and disabled households requiring adapted or accessible accommodation. This includes a high proportion of households from protected groups such as disabled residents, older people, lone-parent families and low-income households.

The SHMA identifies a large disabled population (28.5% of households include someone with a long-term illness or disability), a growing older population, and affordability barriers that affect younger adults. Together, the SHMA and the Local Plan evidence provide a wider assessment of housing market pressures and the kinds of affordable housing products most needed in the Borough. These documents underpin the SPD's guidance on tenure mix and bedroom size mix, with the evidence showing a notable demand for social rent or affordable rent homes, particularly family-sized dwellings. These findings are relevant to equality considerations, as certain demographics of residents are more likely to require affordable family housing.

The forthcoming HEDNA 2026 is expected to provide updated, comprehensive data on housing need, including demographic trends and likely future demand. However, until that assessment is completed, the SPD relies on current evidence.

While the evidence base is strong overall, it contains limited equalities specific data, meaning some protected groups may be underrepresented in the analysis. Existing evidence provides a strong understanding of general housing needs, though detailed data for some protected groups (e.g. ethnic minorities, LGBTQ+ residents, Gypsy & Traveller communities) is limited. Future updates, such as HEDNA 2026, will help close these gaps.

**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.

The draft Affordable Housing SPD has been developed using existing evidence sources but has not yet been formally consulted on. The Council are intending to run a statutory public consultation on the draft SPD for 4 weeks, starting from the 8 May 2026 (8.10.26), subject to approval at E&S Committee on 19 March 2026 (19.03.26). This will enable all stakeholders to provide comment, before the final version of the SPD. The forthcoming consultation will provide valuable insight into any unintentional impacts on protected groups and will be incorporated into the updated analysis.

For the intended consultation, in line with the Council's Statement of Community Involvement (SCI), the certain consultees, bodies and groups would appropriately be consulted as part of the process for an SPD.

**Are there any complaints, compliments, satisfaction surveys or customer feedback that could help inform this assessment? If yes, what do these tell you?**

There have been no complaints, compliments, satisfaction surveys or direct customer feedback relating to affordable housing services or the development of the Affordable Housing SPD. There is a statutory consultation scheduled to run for 4 weeks, starting from the 8 May 2026 (8.10.26), which may help inform this assessment in the future.

**Step 3 – Identifying the negative impact.**

**a. Is there any negative impact on individuals or groups in the community?**

Equality Themes	Barriers/Impacts identified	Solutions (ways in which you could mitigate the impact)
<b>Age</b> (including children, young people and older people)	The SPD relies on general housing needs evidence (SHMA, Housing Register, Local Plan evidence, and forthcoming HEDNA) but does not include age-specific analysis. This creates a potential risk that the needs of groups such as	The impact could be mitigated through: <ul style="list-style-type: none"> <li>Incorporating age-specific housing needs into future evidence gathering</li> </ul>

	<p>older people and younger adults may not be fully addressed.</p> <p>The potential accessibility requirements of older people and affordability barriers potentially facing younger people could be overlooked. Older residents may require step-free, accessible or adapted homes; young adults may face disproportionate affordability challenges</p> <p>These impacts are indirect as the SPD provides guidance rather than policy but may still influence how protected groups access affordable housing.</p>	<ul style="list-style-type: none"> <li>• Ensuring consultation during the SPD process captures the needs of older residents and younger people</li> <li>• Reviewing affordability criteria in light of lower fixed incomes for older residents and lower earning capacity for younger adults.</li> </ul>
<b>Disability</b> (including carers)	<p>The Affordable Housing SPD does not include detailed disability-specific evidence but does identify a high prevalence of disability in the Borough.</p> <p>While the SPD sets out guidance on tenure mix, bedroom size mix and affordability criteria, it does not identify the need for adapted homes or more space, which may negatively affect disabled people who require these.</p> <p>Additionally, income-based eligibility thresholds may disadvantage disabled people who face higher living costs or rely on benefits, potentially limiting access to some tenures.</p> <p>These impacts are indirect as the SPD provides guidance rather than policy but may still influence how protected groups access affordable housing.</p>	<p>The impact could be mitigated through:</p> <ul style="list-style-type: none"> <li>• Incorporating disability-specific housing needs into future evidence gathering</li> <li>• Considering how to encourage or secure accessible and adaptable housing within mixed-tenure schemes</li> <li>• Reviewing affordability criteria in light of additional living costs often experienced by disabled people</li> <li>• Ensuring consultation during the SPD process captures the needs of disabled residents and carers</li> <li>• Explicit reference to M4(2) and M4(3) accessible housing standards should be considered where Local Plan policy supports them</li> </ul>
<b>Gender</b> (men and women)	<p>The Affordable Housing SPD does not include detailed gender-specific evidence, thus creating a potential risk that different challenges faced by</p>	<p>The impact could be mitigated through:</p>

	<p>men and women may not be fully understood or addressed.</p> <p>Women may face increased need for affordable, secure and appropriately sized homes. Men may face more barriers linked to accessing shared or intermediate accommodation due to income thresholds.</p> <p>Therefore, gender-specific challenges may be overlooked and eligibility rules may not fully reflect the differing experiences of men and women in accessing affordable housing.</p> <p>These impacts are indirect as the SPD provides guidance rather than policy but may still influence how protected groups access affordable housing.</p>	<ul style="list-style-type: none"> <li>• Incorporating gender-specific housing needs into future evidence gathering</li> <li>• Ensuring consultation during the SPD process captures the needs of all genders</li> <li>• Reviewing affordability criteria in light of differing household patterns and needs for men and women</li> </ul>
<p><b>Race</b> (including Gypsies &amp; Travellers and Asylum Seekers)</p>	<p>The Affordable Housing SPD does not include detailed race-specific evidence, which creates a potential risk that the needs of ethnic minority households, Gypsy and Traveller and Travelling Showpeople communities and asylum seekers may not be fully captured.</p> <p>Therefore, issues experienced by some ethnic minority families, cultural housing needs or barriers faced by asylum seekers and refugees, such as those linked to affordability and eligibility, may be overlooked.</p> <p>Ethnic minority households nationally experience higher rates of overcrowding and lower incomes, which may affect access to suitable affordable housing.</p>	<p>The impact could be mitigated through:</p> <ul style="list-style-type: none"> <li>• Incorporating race-specific housing needs into future evidence gathering</li> <li>• Ensuring consultation during the SPD process captures needs of ethnic minority communities, Gypsy and Traveller and Travelling Showpeople, asylum seeker and refugee groups</li> <li>• Reviewing affordability criteria in light of households who experience lower incomes and have cultural housing needs.</li> </ul>

	<p>These impacts are indirect as the SPD provides guidance rather than policy, but may still influence how protected groups access affordable housing</p>	
<p><b>Religion or belief</b> (including people of no religion or belief)</p>	<p>The Affordable Housing SPD does not include detailed faith-specific evidence, which creates a potential risk that the particular housing needs of different religious communities may not be fully understood.</p> <p>Therefore, faith-specific challenges may be overlooked and eligibility rules may not fully reflect the differing experiences and needs of different religious groups or those with no religion or belief.</p> <p>Multigenerational living patterns may create additional space requirements for some faith groups.</p> <p>These impacts are indirect as the SPD provides guidance rather than policy but may still influence how protected groups access affordable housing.</p>	<p>The impact could be mitigated through:</p> <ul style="list-style-type: none"> <li>• Incorporating faith-specific housing needs into future evidence gathering</li> <li>• Ensuring consultation during the SPD process captures needs of different faith-type groups</li> <li>• Considering the impacts of the tenure approach on cultural housing needs.</li> </ul>
<p><b>Gender Re-assignment</b> (those that are going through transition: male to female or female to male)</p>	<p>The Affordable Housing SPD does not include detailed evidence on transgender housing needs, which creates a potential risk that the particular housing needs of residents who are going through transition/have gone through transition may not be fully understood.</p> <p>Therefore, specific challenges for transgender individuals may be overlooked and eligibility-based criteria may not fully reflect the employment and financial experiences and housing needs of transgender groups.</p>	<p>The impact could be mitigated through:</p> <ul style="list-style-type: none"> <li>• Incorporating the specific housing needs of residents who are going through transition/have gone through transition into future evidence gathering</li> <li>• Ensuring consultation during the SPD process captures needs of different transgender residents</li> <li>• Considering the impacts of the tenure approach on transgender housing needs</li> </ul>

	These impacts are indirect as the SPD provides guidance rather than policy, but may still influence how protected groups access affordable housing.	
<b>Pregnancy and Maternity</b>	<p>The Affordable Housing SPD does not include detailed pregnancy/maternity-specific evidence, which creates a potential risk that the particular housing needs of these residents are not fully considered.</p> <p>Affordability-based criteria could also create barriers for single parents, particularly if they rely on maternity pay or reduced income during early parenthood.</p> <p>Therefore, specific challenges for pregnant individuals or residents with infants, may be overlooked and eligibility-based criteria may not fully reflect experiences and housing needs of these residents, such as those relating to family housing.</p>	<p>The impact could be mitigated through:</p> <ul style="list-style-type: none"> <li>• Incorporating the specific pregnancy/maternity-based housing needs of into future evidence gathering</li> <li>• Ensuring consultation during the SPD process captures needs of expecting parents and those with an infant</li> <li>• Reviewing affordability criteria in light of households who experience maternity-related income challenges</li> </ul>
<b>Sexual orientation</b> (including gay, lesbian, bisexual and heterosexual)	<p>The Affordable Housing SPD does not include detailed evidence on LGBTQ+ housing needs, which creates a potential risk that the particular housing needs of these residents are not fully considered.</p> <p>Therefore, specific challenges for individuals of differing sexual orientations may be overlooked and eligibility-based criteria may not fully reflect the experiences and housing needs of these group.</p>	<p>The impact could be mitigated through:</p> <ul style="list-style-type: none"> <li>• Incorporating the specific LGBTQ+-based housing needs of into future evidence gathering</li> <li>• Ensuring consultation during the SPD process captures needs of gay, lesbian, bisexual, heterosexual etc. residents</li> <li>• Considering the impacts of the tenure approach, housing mix and eligibility-criteria on LGBTQ+ housing needs</li> </ul>

#### 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 assessment indicates that some changes or mitigating actions may be needed. The draft SPD relies on strong housing evidence but there are some gaps identified in terms of data for specific protected groups, so future analysis could incorporate analysis of these groups. When the statutory consultation takes place, the needs of protected groups should be captured. Further strengthening safeguards within viability processes could ensure that reductions in affordable housing do not disproportionately affect vulnerable households. The final SPD should explicitly reference inclusive design principles, accessibility expectations, and the need for equitable access to affordable housing across all protected groups. Consultation responses from protected groups will be specifically evaluated and incorporated into the updated Consultation Statement (Reg 12).

### Step 5 – Monitoring

**How are you going to monitor the existing service, function, policy or procedure ?**

Monitoring of the Affordable Housing SPD will rely on existing planning and housing processes. This includes through the Council's Local Plan monitoring, Housing Register data, HEDNA updates, annual Infrastructure Funding Statement (for financial contributions) and S106 monitoring of affordable housing delivery.

The operation of viability assessments, review mechanisms, and the application of financial contributions at early, mid and late stages will also provide regular checkpoints to ensure affordable housing delivery is maximised. Engagement with Registered Providers, ongoing assessment of accessible home provision and the review of S106 agreements will help track how well schemes comply with the SPD. Together, these mechanisms will allow the Council to monitor whether the policy is delivering the intended outcomes and identify any impacts on households, including those within protected groups.

Monitoring will include reviewing any disproportionate impacts on protected groups by using anonymised equalities data where available, and liaising with Registered Providers to identify emerging patterns.

### Part C - Action Plan

Barrier/s or improvement/s identified	Action Required	Lead Officer	Timescale
n/a	n/a	n/a	n/a

**Equality Analysis approved by:**

Group Head:	Date:
-------------	-------

**Please send an electronic copy of the Equality Analysis to the Equality & Diversity Team and ensure the document is uploaded to the EA Register which will be available to the public:**

**This Equality Analysis Template is the intellectual property of The National Equality Analysis Support Service Ltd (NEASS) and must not be distributed to or used by any other private or public body, any commercial organisation or any third party without the express permission of NEASS who can be contacted on:**

**The National Equality Analysis Support Service Ltd, 71 – 75 Shelton Street, Covent Garden, London, WC2H 9JQ**

**Office: 0203 500 0700    Email: [info@equalityanalysis.org.uk](mailto:info@equalityanalysis.org.uk)    Web: [www.equalityanalysis.org.uk](http://www.equalityanalysis.org.uk)**

This page is intentionally left blank



# Spelthorne Borough Council

# Climate Change

## Supplementary Planning Document

April 2024





# | CONTENTS



<b>1.0</b>	<b>OVERVIEW</b>	<b>4</b>
	What causes climate change?	5
	What effect is climate change having (and will have)?	3
	The Planning System and Climate Change	3
	The Role of the Climate Change SPD	8
	Other Supporting Policy	9
	How to use this guidance	10
	Key Definitions	11
<b>2.0</b>	<b>CORE THEMES</b>	<b>12</b>
	Energy	14
	Transport	21
	Materials, Construction and Waste	27
	Green Infrastructure	30
	Water	33
	Space & Place Design	37
<b>3.0</b>	<b>IN PRACTICE</b>	<b>38</b>
	The Neighbourhood	39
	The Street	46
	The Building	54
<b>4.0</b>	<b>SUBMITTING YOUR APPLICATION</b>	<b>62</b>
	Using the checklists	62
	Additional documents required	63
	What to expect from SBC	63
	<b>APPENDICES</b>	
	APPENDIX A - CHECKLISTS	64

# | 1.0 OVERVIEW

**1.1** Human-induced climate change is the most pressing and complex challenge of the 21st century. The UN's International Panel on Climate Change (IPCC)'s 2023 report states:

*“Human activities, principally through emissions of greenhouse gases, have unequivocally caused global warming, with global surface temperature reaching 1.1°C above 1850-1900 in 2011-2020.”*

*“Widespread and rapid changes in the atmosphere, ocean, cryosphere and biosphere have occurred. Human-caused climate change is already affecting many weather and climate extremes in every region across the globe.”*

*“Some future changes are unavoidable and/or irreversible but can be limited by deep, rapid and sustained global greenhouse gas emissions reduction ... Limiting human-caused global warming requires net zero CO2 emissions.”*

**1.2** We must all play our part in tackling this emergency. To do so requires examining many aspects of how we live, including how we develop and manage the buildings, places and spaces around us.

**1.3** Although the UK Government has committed to Net Zero Carbon at a national level by 2050, through the Climate Change Act, Spelthorne Borough Council (SBC) has declared a climate emergency, with an ambition of achieving Net Zero carbon status by 2030. This is supported by Spelthorne's Climate Change Strategy 2022-2030.

**1.4** This Supplementary Planning Document (SPD) sets out how new development in Spelthorne Borough, that is controlled through the planning system, can play its part in reducing the effects of climate change, and in adapting successfully and resiliently to a changing climate. This SPD and the associated Core Strategy policy that it relates to is a key part of the Council's efforts to implement the strategy and achieve the overall Net Zero goal.

**1.5** The changes we need to make to how and what we build and develop are more than just about avoiding a long-term future of extreme climate change. When considered as a fundamental part of the design of places, they can enhance our quality of life by:

- Making our homes and buildings more efficient, and cheaper to run
- Reducing travel costs by making it easier and more convenient to walk and cycle in our daily lives
- Encouraging daily physical activity and healthy places
- Ensuring nature has space to thrive in our towns and open spaces
- Enabling contact with nature for people, which has been shown to improve our mental health and wellbeing
- Improving air quality, road safety and reducing noise through more use of active travel, clean public transport and electric vehicles
- Preserving our valued open spaces and countryside through more compact and better-located development
- Creating places that are more socially equitable and prosperous for the long-term

**1.6** These objectives align strongly with SBC's corporate objectives as a council, as expressed in the SBC Corporate Plan 2021-23 and is supported by national guidance such as the National Design Guide, the Department for Transport's Gear Change strategy, and Sport England's Active Design guidance (supported by Active Travel England and Office for Health Improvement and Disparities).

## What causes climate change?

**1.7** The immense amount of greenhouse gases humans have released into the atmosphere are causing our climate to change. The burning of fossil fuels, releasing greenhouse gases, has increased the amount of heat from the sun trapped in our atmosphere.

**1.8** Carbon dioxide emissions, the primary cause of human-induced climate change, are emitted from the burning of fossil fuels such as oil, gas, petrol and diesel to generate energy, in both electricity generation plants and in vehicle engines. Because energy use is fundamental to our modern economy and way of life, this means that tackling climate change requires action that needs to be taken in a range of areas, not least in development and construction. Considerable amounts of energy consumed are also wasted through inefficiency.

**1.9** UK Government statistics for 2022 (shown in Figure 1) show that 25% of the UK's emissions were from the supply of energy (electricity), 33% from transport (internal combustion engines), 18% from residential (primarily gas or oil boilers), and the remaining 24% made up of business, public sector, industrial processes and other processes.

**1.10** In each of these sectors there is a challenge to reduce carbon emissions, by making our use of energy more efficient and less wasteful and moving away from energy sources that emit carbon towards clean, renewable generation.

**1.11** Our electricity grid is moving rapidly towards clean, zero-carbon energy, and as a result, there is much focus on electrification of sectors as a core approach. This should also be accompanied by energy efficiency measures to ensure that the transition can happen successfully.

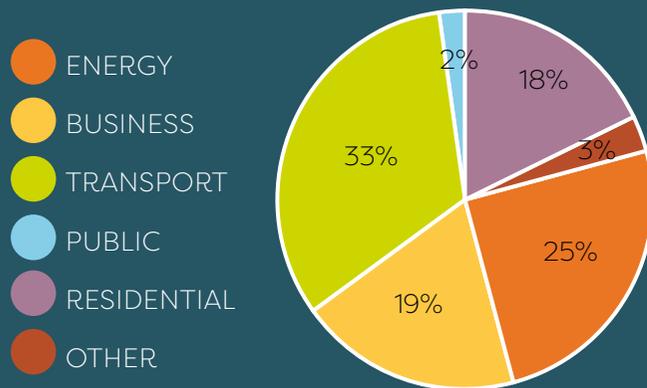


FIGURE 1: UK CARBON EMISSIONS BY SECTOR, 2022 - PROVISIONAL (DEPT FOR ENERGY SECURITY & NET ZERO, OFFICE FOR NATIONAL STATISTICS)

## What effect is climate change having (and will have)?

**1.12** Climate change is changing weather patterns across the world. Greenhouse gases, of which the most prevalent is carbon dioxide, trap heat and increase the average global temperature in the air, oceans and land, meaning that established patterns of weather are disrupted. This is leading to more extreme weather than we are used to, such as extended heatwaves, heavy rainfall events and storms, and higher rainfall or extreme cold weather in winter.

**1.13** These have an effect on humans, through changes to agriculture, damage to property or even loss of life, as well as a reduction in overall quality of life. Recent years have shown that such events, which are becoming more likely, can inflict severe economic damage on areas affected.

**1.14** An overall warming climate is also leading to changes in the ecosystems around us, as species that rely on certain temperatures, weather patterns and other climate-related signals have to adapt or lose their habitats. It means that the UK is seeing different species move in (as well as losing other native species). This can disrupt delicate ecosystems where many species rely on each other to survive and thrive.



## The Planning System and Climate Change

**1.15** The built environment, in its construction, operation and the effect it has on our behaviours, is a major contributor towards the carbon emissions that are causing global climate change. The planning system therefore has a major role in ensuring that new development is of the highest environmental standards, helping the UK move towards its national target of Net Zero carbon emissions by 2050.

**1.16** Research has shown that the location, density<sup>1</sup> and connectivity of new development has a substantial effect on anticipated lifetime carbon emissions of a place. Higher density urban locations can have more sustainable transport choices and local facilities. They can have around 1/3 of the emissions of development in rural or isolated areas, which are dependent on cars<sup>2</sup>.

<sup>1</sup>Lee, Sungwon and Bumsoo Lee. 2014. *The influence of urban form on GHG emissions in the U.S. household sector. Energy Policy* 68: 534-549.

<sup>2</sup>Source: *Greater Cambridge Local Plan - Strategic spatial options appraisal: implications for carbon emissions. Scenario shown implementing zero-carbon policies for new buildings, in line with RIBA/LETI guidance and Future Homes Standard*

**1.17** Healthy habitats sequester carbon, removing it from the atmosphere and storing it away. Land can be used to either remove carbon from the atmosphere with woodland or wetland habitats, or to generate clean energy through solar or wind power. This must be balanced against other benefits of woodland and habitat restoration.

**1.18** Individual buildings, primarily through how they are heated, cooled and ventilated, make a major contribution towards emissions in their operation, especially buildings with poor insulation, carbon-emitting heat sources or design that contributes to overheating in the summer. Buildings consume considerable amounts of 'embodied' carbon as

part of being built, in the materials (e.g. concrete, brick and cement) and methods of construction used. Cement and concrete are particularly carbon intensive, due to the chemical processes involved in their production.

**1.19** The changes that climate change is already making to our weather patterns also affects the built and natural environment, and how we use it. More extreme weather events can cause flash flooding, overheat homes, or make the public realm unusable due to excessive heat, exacerbated by the urban heat island effect. The planning system has a role in helping to ensure that the spaces and places we create now are adapted and resilient to this future.

**1.20** The planning system has to anticipate changes that could occur in the future. There is already strong evidence of changing lifestyles and attitudes around these issues. The COVID-19 pandemic has also caused a rethink in how people view and interact with their local neighbourhood, the quality of the environment, and its overall sustainability.

## Role of the Climate Change SPD

**1.21** This SPD has been prepared to build upon and provide more detailed guidance to applicants on how to implement SBC's Core Strategy strategic policy SP 'Climate Change and Transport' of SBC's Core Strategy (2009). The policy states:

***Policy [SP7] seeks to reduce climate change effects by:***

- a) promoting inclusion for renewable energy, energy conservation and waste management in new and existing developments*
- b) development reduces the need to travel and encourages alternatives to car use*
- c) encourage non car-based travel,*
- d) promoting the efficient use and conservation of water resources,*
- e) promoting measures to reduce flooding and the risks from flooding,*
- f) supporting measures to enhance and manage Staines' role as a public transport interchange.*

**1.22** Supporting this strategic policy are three implementation policies:

***Policy CC1: Renewable Energy, Energy Conservation and Sustainable Construction.*** Policy requires residential development of one or more dwellings and other development involving new building or extensions exceeding 100m<sup>2</sup> to: *optimise design, layout and orientation of development to minimise energy use, and include measures to provide at least 10% of the development's energy demand from on-site renewable energy sources unless it can be shown that it would seriously threaten the viability of the development. Encouraging renewable energy equipment installation, sustainable construction materials, encouraging developments to attain high energy efficiency rates e.g. BREEAM 'very good'.*

***Policy CC2: Sustainable Travel.*** The Council will seek to secure more sustainable travel patterns. *Staines public transport interchange, development to be accessible by non-car means, site specific travel plans for major developments.*

***Policy CC3: Parking Provision.*** This policy details that the Council will require the provision of sufficient, safe, weatherproof, convenient and secure cycle parking within developments to assist in promoting cycle use.

**1.23** SBC's Pre-Submission Local Plan to 2039 was published for consultation in June 2022 and submitted for examination in Nov 2022, with a new policy PS1 on climate change, which in due course will replace the Core Strategy (2009). This SPD has been designed so that when this updated policy comes into force, upon adoption of the Local Plan, it will be updated with relevant references and necessary changes but the core principles and guidance on implementation will remain the same, giving applicants certainty even as the underlying policy framework may change.

**1.24** Planning applications submitted to SBC will need to demonstrate how they have considered the guidance in this SPD as part of their design, and how they have satisfied the policy requirements. To support this, SBC's validation requirements for material submitted with different types of application has been updated to require this information. This guidance provides checklists and templates for applicants to submit along with their proposals to make this process easier. These are detailed in 'How to use this guidance' below, and in the final chapter 'Submitting your application'. **This SPD is a material consideration in decision making, meaning that whether or not a development scheme has taken into account this guidance, and demonstrated how it has done so, will be taken into account when determining the planning application.**

## Other supporting policy

**1.25** Along with SBC's planning policy, a number of other key documents support action on climate change within the built environment, and have informed this SPD:

-  [The National Planning Policy Framework \(2021\)](#)
-  [Surrey County Council Transport Plan and supporting Local Cycling and Walking Infrastructure Plans \(LCWIPs\)](#)
-  [Spelthorne Borough Council Climate Change Strategy \(2022-2030\)](#)
-  [Surrey County Council Climate Change Strategy \(2020\)](#)

### MAJOR APPLICATIONS: DEMONSTRATING SUSTAINABILITY

For major applications, demonstrating how you have addressed this guidance may be facilitated through industry-accepted metrics and certifications.

Where these are available they are set out at the end of each Theme. These are not SBC policy requirements but are suggested approaches.



# How to use this guidance

**1.26** This document is intended to be a practical guide to achieving Spelthorne’s climate change objectives through the planning system. It is set out in three key parts:

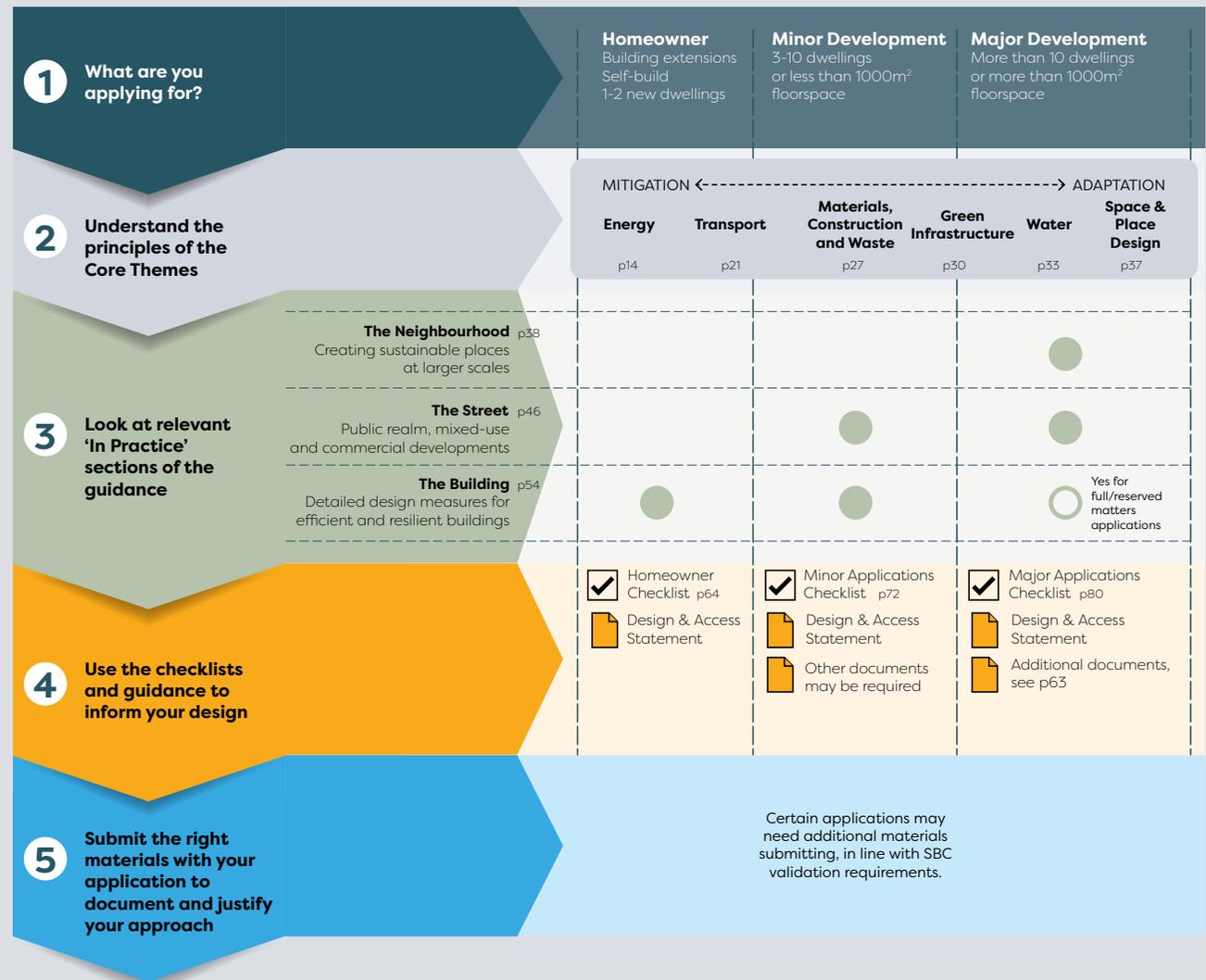
- **Core Themes:** the key principles of design that underpin the six themes of this document: Energy; Transport; Materials, Construction and Waste; Green Infrastructure; Water; and Space and Place Design.
- **In Practice:** demonstration of how the principles can be implemented in practice at a range of scales: The Neighbourhood; The Street and The Building.
- **Preparing your Application:** what materials you need to submit with your planning application to demonstrate you have considered climate change issues, with checklists for householder, minor and major applications.

**1.27** For applicants preparing typical development planning applications, the flowchart below sets out how this document should be used for different types of development, the key sections that should be consulted, and what should be submitted with your planning application.

**1.28** For specialist applications that are outside the scope of this guidance, it is recommended that SBC is consulted on relevant requirements through a pre-application process.

HOW TO USE THIS GUIDANCE

FIGURE 2: GUIDANCE TABLE

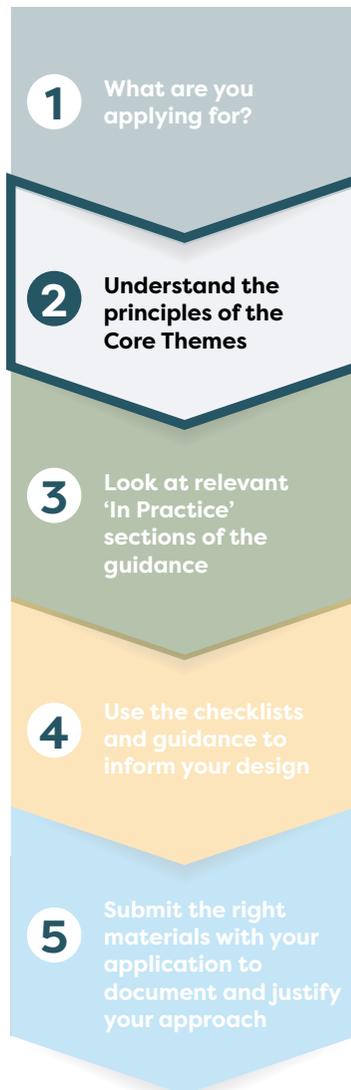


## Key Definitions

1.29 Many terms are used in the field of climate change and carbon emissions may not be familiar or can be used in different ways. The following table provides definitions for the terms used most frequently in this SPD.

Term	Definition
Greenhouse Gases	<i>Gases, both emitted natural and by human activity, that when accumulated in the atmosphere trap heat from the sun. A natural level of greenhouse gases keeps the planet with a stable climate and prevents all the sun's energy from escaping into space. A rising and unnatural level causes a runaway 'greenhouse effect', where too much heat is trapped.</i>
Carbon / CO <sub>2</sub> e	<i>The main human-emitted greenhouse gas is carbon dioxide (CO<sub>2</sub>), although others such as methane (CH<sub>4</sub>) exist, which are less prevalent but often trap more heat. Collectively, they are measured by their equivalent warming effect to carbon dioxide, CO<sub>2</sub> equivalent, to ensure consistency of measurement. Carbon dioxide emissions are primarily due to the burning of fossil fuels such as oil, gas, petrol and diesel for energy, in both electricity generation plants and in vehicle engines.</i>
Net Zero / Carbon Neutral	<i>A project, entity or building that balances any carbon emissions with equivalent carbon removal from the atmosphere, or does not emit any carbon emissions at all. This term should be used carefully and when used, it should be clearly stated whether it is a 'whole life carbon' net, and what scope of emissions it considers. (see definitions below)</i>
Operational Carbon	<i>The carbon emissions generated by a building or piece of infrastructure in its normal operation and maintenance. Typically this concerns 'regulated' energy (see below).</i>
Upfront / Embodied Carbon	<i>The carbon emissions generated during a building or piece of infrastructure's construction, for example through the choice of materials, production of concrete and cement, construction vehicles, and other activities generated by the one-off act of construction.</i>
Whole life carbon	<i>The combined sum of operational carbon and embodied carbon for a building, measured over its whole design life span.</i>
Regulated Energy	<i>Energy consumed by a building, associated with fixed installations for heating, hot water, cooling, ventilation, and lighting systems.</i>
Unregulated Energy	<i>Energy consumed by a building that is outside of the scope of Building Regulations, e.g. energy associated with equipment such as fridges, washing machines, TVs, computers, lifts, and cooking.</i>
Scope 1/2/3	<i>In order to take action to reduce emissions, scopes of emissions help understand and measure where they're sourced. They are the level of emissions considered or accounted for by a single entity, project or building.</i>  <b>Scope 1:</b> <i>emissions from sources owned or controlled directly – for example from burning petrol or diesel in a fleet of vehicles, or from heating a building through gas.</i> <b>Scope 2:</b> <i>emissions caused indirectly and from where the energy purchased and used is produced. For example, the emissions caused when generating the electricity used in a building.</i> <b>Scope 3:</b> <i>emissions, including all indirect emissions which are not included in scope 2. It encompasses emissions that a building or entity is indirectly responsible for up and down its supply chain.</i>
Offsetting	<i>An approach to achieving Net Zero carbon emissions, by creating new natural habitats or employing other methods that will remove carbon emissions from the atmosphere, offsetting residual emissions that cannot be reduced by other means.</i>

# | 2.0 CORE THEMES



2.1 Designing and planning for climate change has two aspects:

- Mitigation: reducing or eliminating carbon emissions from development, homes, transport, buildings and the lives we lead, so that Spelthorne plays its part in reducing climate change overall
- Adaptation: anticipating what a changing climate will mean for the built and natural environment, and designing to meet these changes and challenges

2.2 Mitigating and adapting for climate change covers many fields and requires a co-ordinated approach that goes beyond energy efficiency measures and should be a fundamental part of all design and planning.

2.3 This document sets out how mitigating and adapting for climate change in development proposals can be achieved, across six core themes as follows:

2.4 The themes are arranged on a sliding scale from Mitigation through to Adaptation (anticipating what a changing climate will mean for the built and natural environment, and designing to manage these changes). Where a theme is closer to Mitigation, it means that reduction in carbon emissions is the largest part of the measures recommended or required. Where a theme is closer to Adaptation, it means that theme deals more with the likely effects of climate change.

2.5 This chapter sets out core design principles for each theme, which should be used to guide the design process and will help assess how development proposals have considered climate change and whether this is shown in the planning application. Guidance and examples of how best to implement these principles in practice, across a wide range of scales and contexts, is contained in the following chapter 'In Practice'.

2.6 The core design principles are the first things an applicant for new development should consider when designing their schemes and submitting applications. However they are not exhaustive, and other evidenced and quantified approaches to achieve the same outcomes are encouraged.



FIGURE 3: CORE DESIGN PRINCIPLES

## Energy

2.7 The use of energy in the built environment, particularly for heating and cooling in homes and other buildings, is one of the top contributors to carbon emissions in the UK through the burning of fossil fuels. Although the UK electricity generation sector is decarbonising rapidly, existing carbon-emitting uses (such as gas boilers), are still prevalent.

### Follow the Energy Hierarchy

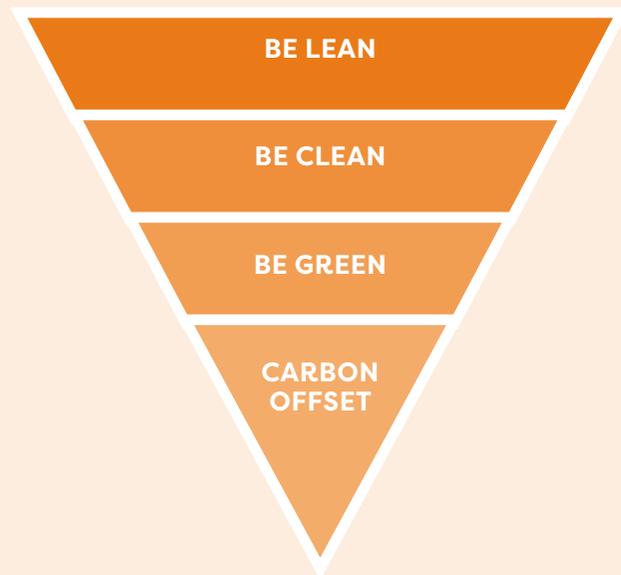


FIGURE 4: ENERGY HIERARCHY

2.8 When considering sustainable energy options, the Energy Hierarchy should be used to prioritise and assess them. It sets out a priority approach to assist progress towards a more sustainable energy system, in order of most sustainable (highest immediate impact on emissions) to least. This can help make and justify design decisions that aim to reach Net Zero in the most efficient way.

2.9 The Energy Hierarchy is, in the following order:

1. Be lean: use less energy and manage demand during operation through fabric and servicing improvements and the incorporation of measures that actively reduce usage or encourage lower demand
2. Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly by connecting to district heating networks
3. Be green: maximise opportunities for renewable energy by producing (e.g. PV panels), storing (e.g. through batteries) and using renewable energy on-site

4. Offsetting of residual emissions through external accredited carbon offsetting schemes

2.10 Proposals should demonstrate how they have maximised opportunities at each level of the hierarchy before seeking opportunities further down.

### **Be lean: Retrofit existing buildings**

2.11 It is anticipated that 85-90% of the buildings that will be standing in 2050 have already been built, making it imperative that their operational carbon emissions are reduced. This should be undertaken, where possible, through an energy hierarchy approach of fabric-level improvements before maximising opportunities for energy generation, such as photovoltaic (PV) panels. When planning changes to existing buildings, it is therefore important to consider how energy demand could be reduced or the potential for renewable energy generation on site.

2.12 Further details on key interventions are set out in 'The Building' in the 'In Practice' chapter.

## Energy

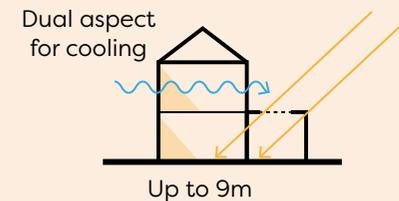
**Be lean: Design buildings to be passively cooled, lit naturally and need minimal heating**

2.13 Using energy to heat, cool and light buildings is the largest single source of carbon emissions from the built environment. Much can be achieved in the design of buildings to reduce this need.

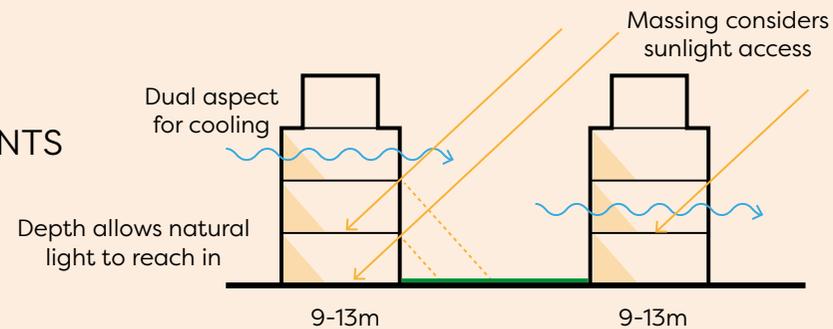
2.14 Key measures include:

- Design buildings considering how the sun could provide heating and light (solar gain). This should consider aspect and how the building will respond throughout the year. Southern elevations should maximise the window area but include either fixed or moveable shades or blinds to cut sunlight in the summer and prevent overheating. East and west elevations should ensure they have moveable shading to cut out the lower sun angles at sunrise and sunset in the summer, but still able to maximise heating at other times of year. Lower floors should have more glazing as they are likely to have reduced incoming light due to surrounding buildings.

## HOMES



## APARTMENTS



## COMMERCIAL &amp; MIXED USE

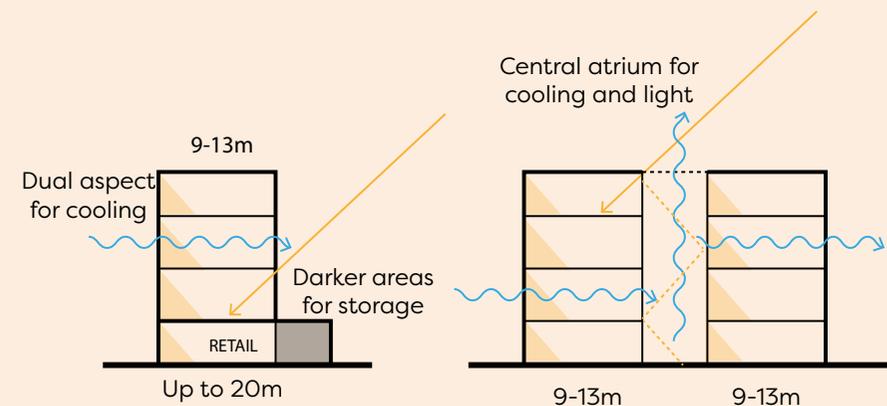


FIGURE 5: DESIGN FOR PASSIVE HEATING AND COOLING FOR DIFFERENT TYPES OF BUILDING

## Energy

- Building dimensions should allow natural light to reach as much of the interior as possible., Beyond around 4-5m little light reaches an interior from a side window. Use of interior atriums, skylights and light wells can reduce the need for artificial lighting. Light analysis may be needed to demonstrate that internal levels of light are acceptable.
- Building design that creates dual aspect dwellings, where air can flow through from one side to another. This is especially important in the design of apartment buildings.
- For larger buildings, design can encourage natural interior air flow instead of relying on energy-hungry heating, ventilation and air-conditioning (HVAC) systems.
- All buildings should be insulated to the highest standards, with high levels of high-performance exterior wall and roof insulation employed. Windows are major locations of heat loss and should be either triple-glazed or have high-performance modern double glazing. Doors and other openings should be well-sealed and insulated to modern standards.
- The exterior form factor of a building (its massing) affects how much of a heated interior is exposed to the outside. Reducing the exterior surface area by simplifying the form factor reduces how much insulation will be needed and how much heat will be lost.



FIGURE 6: PASSIVE COOLING / HEATING PRECEDENTS (BOTTOM LEFT: GREAT KNEIGHTON, CAMBRIDGE; BOTTOM RIGHT: CAMPBELL HEIGHTS, MILTON KEYNES)

## Energy

### **Be clean: Connect to heating networks and exploit local heat sources**

2.15 Developments within existing district heating networks should connect to them or make provision for this to be possible. These centralised sources of heat are more efficient and can be more easily converted to clean energy sources than individual boilers. They are most suitable for denser development, such as apartments.

2.16 Waste heat from nearby generators (for example industrial fridges and air-conditioning units) can also be recovered and used within such networks.



FIGURE 7: ENERGY CENTRE AT EDDINGTON, CAMBRIDGE, WHICH REUSES WASTE HEAT FROM SUPERMARKET FRIDGES TO SUPPLY THE LOCAL AREA WITH HEAT, AND IS INTEGRATED BEHIND SURROUNDING HOMES

#### **Heat Interface Unit (HIU)**

Transfers heat from external distribution network to low-temp domestic sealed system. Location of metering and temperature regulation.

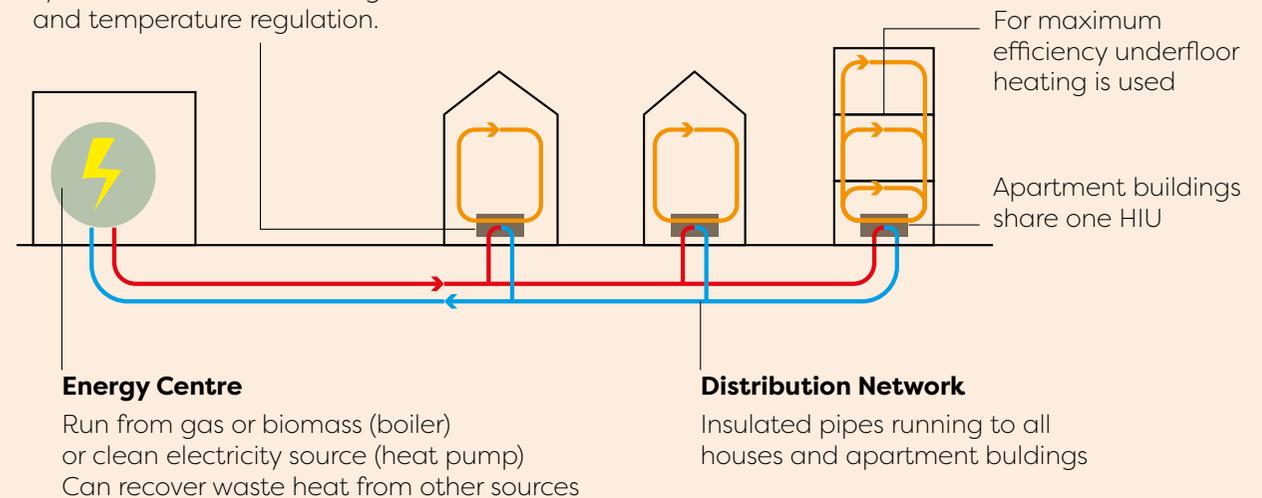


FIGURE 8: HOW HEAT NETWORKS WORK

## Energy

### **Be green: Generate and store energy on site**

2.17 On-site generation of renewable energy is typically accomplished through solar panels (photovoltaic or PV panels) on roofs, although other approaches such as wind turbines and solar water heating are also possible. They can provide a significant portion of a home or business's energy needs, and can feed into the electricity grid when they are producing in excess of on-site demand, further offsetting an individual's electricity bill. All major applications must generate at least 10% of demand from on-site renewables

2.18 Although solar panel installations will be generally supported, in designated conservation areas or other areas with Article 4 restrictions on permitted development rights there may be some restrictions on the installation of panels on roofs, to preserve a historic street scene or character. In these circumstances SBC should be consulted for advice.

2.19 The supply of renewable zero-carbon energy can fluctuate depending on weather conditions, so it is possible to store surplus energy for use later when demand is higher. Home or on-site batteries, connected as part of a solar panel installation, can be an effective way of achieving this.



FIGURE 9: ILLUSTRATIVE APPROACHES TO CLEAN ENERGY GENERATION AND STORAGE

## Energy

### **Observe standards and obtain accreditation**

**2.20** Building Regulations (part L) sets the legal standards for energy efficiency and consumption measures within new and existing buildings. Beyond this, the Future Homes Standard will uplift part L requirements from 2025. This will require low carbon heating and very high levels of energy efficiency.

**2.21** Other standards exist for different building types. BREEAM set detailed standards for commercial buildings, and it is expected that such buildings will attain at least 'Very Good' status, with Excellent or Outstanding preferred.

**2.22** For residential buildings, standards such as Passivhaus exist, demonstrating the very highest levels of energy efficiency in design. Passivhaus principles can be applied to both new and existing buildings.



FIGURE 10: : GOLDSMITH STREET, NORWICH, DEVELOPMENT OF PASSIVHAUS HOMES (MIKHAIL RICHES ARCHITECTS)

### **Utilising data, monitoring and energy targets**

- 2.23** Modern technology can assist building managers and homeowners in understanding the performance of existing buildings and identifying opportunities for improvements. These can include, depending on the type of building:
- Smart meters for electricity and gas giving real-time information on usage
  - Thermographic surveys to identify heat loss through the external envelope, prioritising where insulation and replacement of windows and doors might best be undertaken
  - Demand-responsive lighting and heating, ventilation and air-conditioning (HVAC) systems, based on presence of users
  - Energy Performance Certification (EPCs) to assess key opportunities for performance improvement

**2.24** Proposals for the retrofit and alteration of existing buildings should endeavour to use such tools to inform their design proposals, addressing the largest opportunities identified through such data.

**2.25** Where proposals commit to measurable targets in carbon emission reduction (or absolute targets), this must be accompanied by details of how this will be measured and evaluated over time.

### **Further Reference**

**2.26** More detailed information on these topics can be found in the following guidance:

-  [LETI Climate Emergency Design Guide](#)
-  [Passivhaus Trust/Etude/Levitt Bernstein - Passivhaus Design: Easi Guide](#)
-  [Future Homes Standard](#)
-  [UK Net Zero Carbon Building Standard](#)
-  [RIBA Climate Challenge 2030](#)
-  [Historic England: Energy Efficiency and Historic Buildings](#)

### **MAJOR APPLICATIONS: DEMONSTRATING SUSTAINABILITY**

-  BREEAM Building Certification
-  PassivHaus Certification

## Transport

### Transport

2.27 Transport is the largest single source of carbon emissions in the UK by sector, and based on current travel patterns, one of the most difficult to decarbonise. Reducing our dependence on private vehicle transport (primarily petrol or diesel-driven cars), and encouraging walking, cycling and other active travel measures for more of our daily journeys, is the simplest way to reduce transport carbon emissions. This should be supported by wider implementation of Liveable Neighbourhood principles, and comprehensive and convenient public transport for longer-distance journeys.

#### ***What is a Liveable Neighbourhood?***

*Liveable Neighbourhoods are areas of a town or city that are improved to be people-centred and more 'liveable'. Typically, this may involve changes to town centres and surrounding residential areas to improve conditions for walking and cycling and reduce traffic dominance. This may include new pedestrian crossings, a network of good cycle routes, reduced parking provision, redesigned junctions, restrictions on motor traffic in town centres, high streets and residential streets, and wider improvements.*

#### ***What is active travel?***

*Active travel is not just walking and cycling. It also includes all physically active ways of getting about, such as wheeling, which covers assistive wheeled mobilities such as wheelchairs, mobility scooters or similar. It can also include pushchairs or buggies for children.*

*Cycling can mean more than the traditional two wheeled bicycle, as it can also include cargo bikes, electric bikes, hand-powered recumbent bikes, bikes with trailers, tricycles and other pedal-powered transport. A full definition of cycles to consider is set out in the Department for Transport's Local Transport Note (LTN) 1/2014.*

## Transport

### Follow the Travel Hierarchies

**2.28** In line with Surrey County Councils Local Transport Plan (LTP4), design proposals should aim to, in the following order:

1. Avoid the need to travel, and reduce distance travelled by improving the efficiency of the land use and transport systems. For example, by locating shops, schools and other regularly used places close to as many homes as possible.
2. Shift to lower energy consumption travel, and more efficient modes: public transport, walking and cycling. For example, by strengthening walking and cycling networks to make them more attractive and quicker to use, and by providing high-frequency, reliable bus services.
3. Improve the energy efficiency of modes, operational efficiency of networks, and reducing vehicle emissions using technology. For example, by prioritising active travel and public transport at junctions, or by supporting electric vehicles through the provision of charging infrastructure.

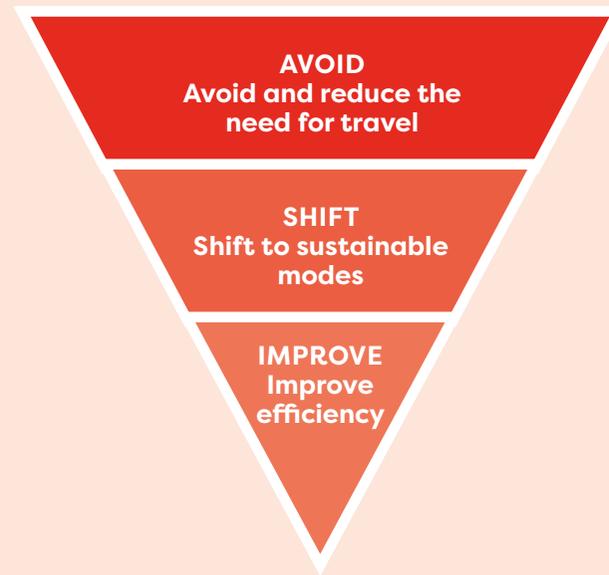


FIGURE 11: HIERARCHY FOR OVERALL APPROACH TO TRAVEL

**2.29** When considering the design of places to facilitate movement, design should encourage the most sustainable transport choices, with the lowest carbon emissions per unit travel. This can be done by following a hierarchy of design as set out in the diagram below:

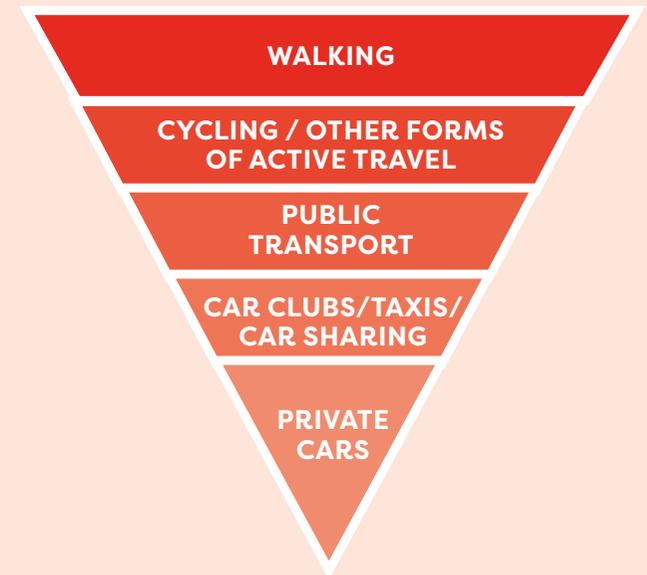
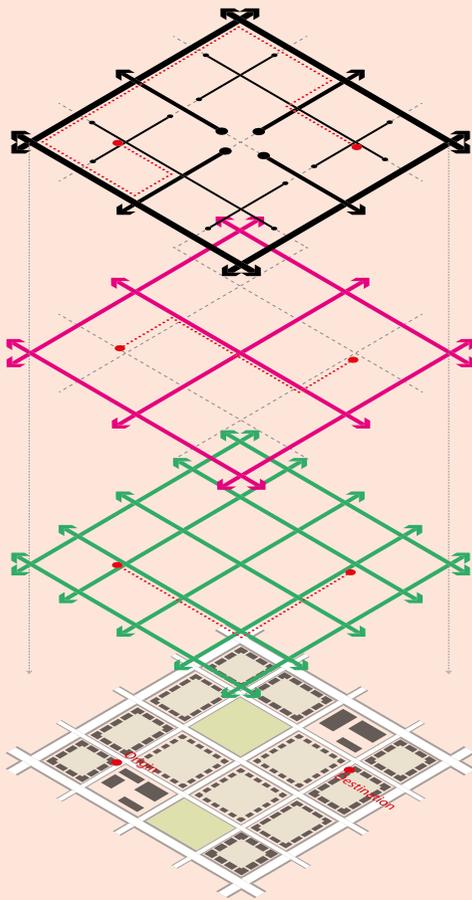


FIGURE 12: DESIGN HIERARCHY FOR MOBILITY

**2.30** This hierarchy is set out in Surrey's Local Transport Plan (LTP4). In practice, it means placing the needs and requirements of those users who are higher in the hierarchy (e.g. pedestrians) first, before accommodating the needs of e.g. private vehicles.

## Transport

### Design for 'filtered permeability' and Liveable Neighbourhoods



#### Cars / Private Vehicles

Through routes limited to main routes to discourage rat-running, create quieter streets, and make walking and cycling more convenient without restricting access.

Emergency vehicles could still be provided access through gaps in the network.

#### Public Transport

Buses able to run along key streets continuously including through bus gates that create gaps for private vehicles.

#### Active Travel

Connected and continuous streets for walking and cycling.

**2.31** Residential areas in cities and towns are often used by through-traffic, which creates noise, pollution and hazards. By reducing the dominance of vehicles, Liveable Neighbourhoods reconsider how street space is reallocated, creating healthier outdoor spaces for everyone to share, as well as vibrant places where people want to dwell and spend money.

**2.32** To support this, the principle of filtered permeability is that active travel routes should form a continuous and connected grid through streets. Private vehicle movement along the same streets should be less direct, with no-through routes for cars created by design interventions such as street planting, bollards, materials changes or similar, without blocking pedestrians and cyclists. Active travel connections should have good natural surveillance from buildings for safety.

**2.33** The same principle can be used to support direct public transport routes through communities, which support active travel networks by providing onward connections. Bus connections should be direct and uninterrupted, with the use of bus gates (where buses are allowed through but cars are not) at key locations to provide an advantage over private vehicle traffic.

**2.34** Modern mobile app navigation has increased the use of side streets as cut-throughs for motor vehicles. Filtered permeability, by removing such through routes for vehicles (but not cyclists or pedestrians) in residential streets, puts traffic back onto main streets, which are designed to be able to accommodate through vehicle movement. This can make smaller, residential streets more attractive, with a better environment, improved air quality and safer for active travel.

FIGURE 13: GETTING ABOUT BY DIFFERENT MODES OF TRAVEL IN LIVEABLE NEIGHBOURHOODS

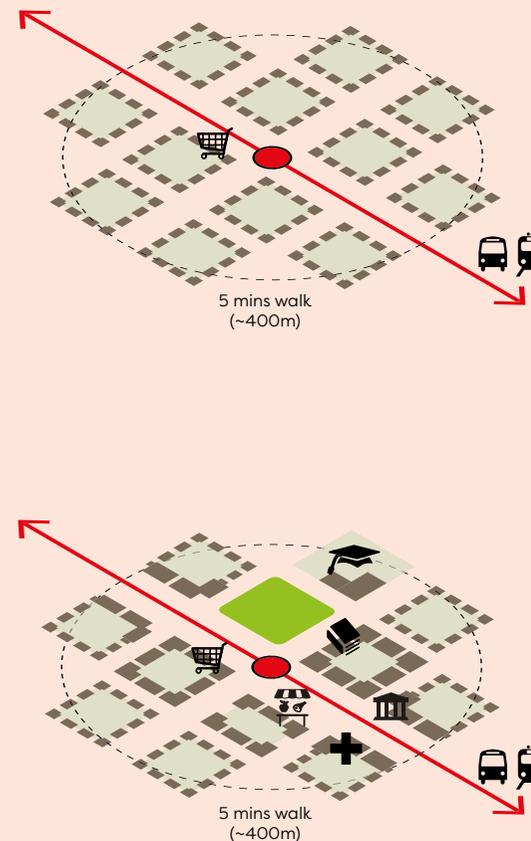
## Transport

### Locate development for sustainable travel choices

**2.35** The location of development has the biggest impact on whether residents and users need to travel (point 1 in the travel hierarchy), and if they do need to travel, the modes and choices available to them. Development should be located close to other destinations, active travel networks and public transport services.

**2.36** This means that locations such as town centres, public transport corridors and local centres should have higher densities of development and a greater mix of uses and services than less well-connected areas. This principle is known as 'transit-oriented development'. It means that people in those locations have a choice of services on their doorstep, and a choice of sustainable transport options for longer journeys elsewhere. It also ensures that everyone connected to those locations by active travel and public transport can access a wide variety of services by sustainable means.

**2.37** When masterplanning larger sites, mixed uses and higher densities should be located close to sustainable transport choices and active travel routes.



#### Low Density Housing

-  People within 5 mins walk of public transport
-  Facilities close to public transport

#### Mix of uses and concentrating development near public transport

-  People within 5 mins walk of public transport
-  People within 5 mins walk of public transport
-  People within 5 mins walk of public transport
-  Facilities close to public transport

FIGURE 14: LOCATING DENSITY, FACILITIES AND DEVELOPMENT NEAR TO PUBLIC TRANSPORT

## Transport

### *Provide infrastructure for sustainable transport*



**2.38** Many vehicles are now being electrified. This change requires a rethink in the infrastructure provided to power vehicles, moving from fuel filling stations towards charging points. Electric charging points for cars and e-bikes should be provided where possible. Car parks and areas of parking within local and town centres should include public charging points.

**2.39** All buildings should ensure that active travel is the easiest choice for most journeys, with secure and convenient cycle parking that is easier to use than getting in the car. Secure visitor cycle parking in the public realm should be in prominent locations and close to entrances of buildings.

FIGURE 15: ILLUSTRATIVE INFRASTRUCTURE TO SUPPORT SUSTAINABLE TRAVEL



FIGURE 16: DESIGN PRINCIPLES FOR EFFECTIVE SUSTAINABLE TRAVEL MOBILITY HUBS

**2.40** Where different sustainable modes of travel interchange (e.g. between walking/cycling and bus, two different bus routes, or rail/bus), consideration should be given to providing a mobility hub. These should provide:

- 1 A clear and simple interchange between modes
- 2 Secure cycle storage
- 3 Safe pedestrian movement and crossings
- 4 Covered, safe waiting areas
- 5 Real-time travel information
- 6 Supporting shops and facilities

**2.41** Mobility hubs should also integrate other transport choices, such as car clubs, licensed e-scooter and e-bike hire, and EV charging points.

### Further Reference

**2.42** More detailed information on these topics can be found in the following guidance:

-  [RTPI: Net Zero Transport](#)
-  [TCPA: The 20 Minute Neighbourhood Guide](#)
-  [Surrey Local Transport Plan 4](#)
-  [Local Cycling & Walking Infrastructure Plans \(LCWIPs\)](#)
-  [Surrey Bus Service Improvement Plan](#)
-  [Active Design \(Sport England, Active Travel England and Office for Health Improvement and Disparities\)](#)
-  [Healthy Streets for Surrey Design Guide](#)
-  [Surrey Electric Vehicle Parking Guidance in New Developments](#)

## Transport

# Materials, Construction & Waste

2.43 The construction industry is responsible for around 20% of emissions from the built environment<sup>3</sup>. This is primarily through the sourcing and production of materials such as cement, concrete, glass, steel and aluminium, and direct emissions from vehicles and equipment used in the construction process. New materials and construction approaches have the potential to reduce this, and using a whole life carbon methodology can assess the climate change impact of new development versus improvements to existing buildings.

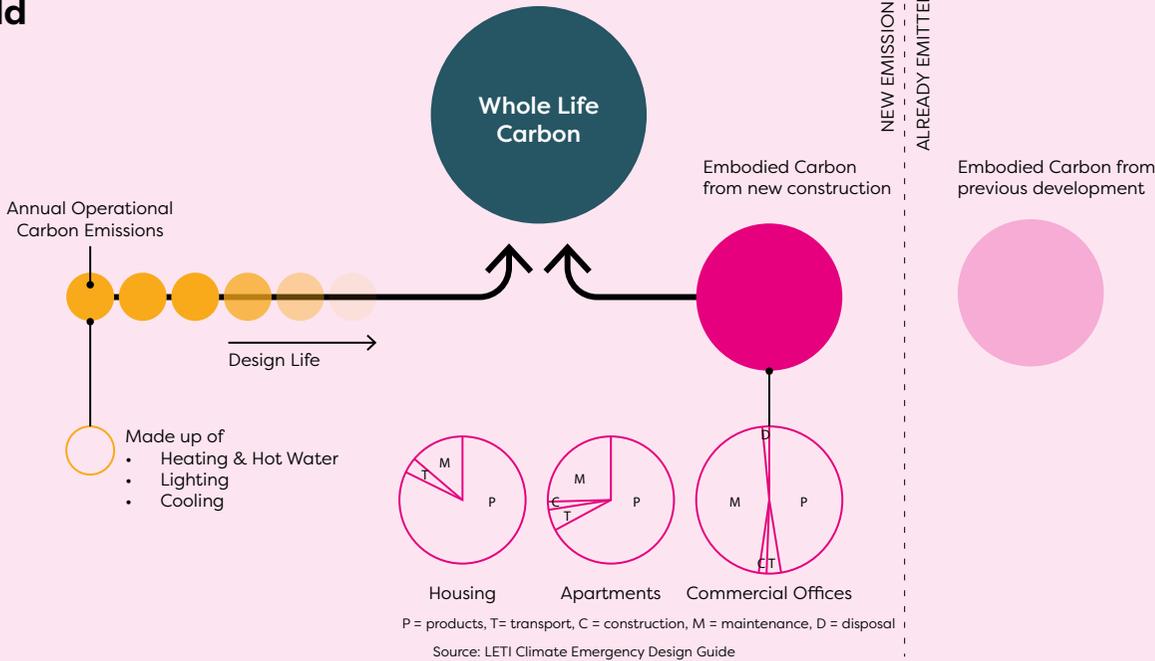
### MAJOR APPLICATIONS: DEMONSTRATING SUSTAINABILITY

- RICS Whole Life Carbon Assessment

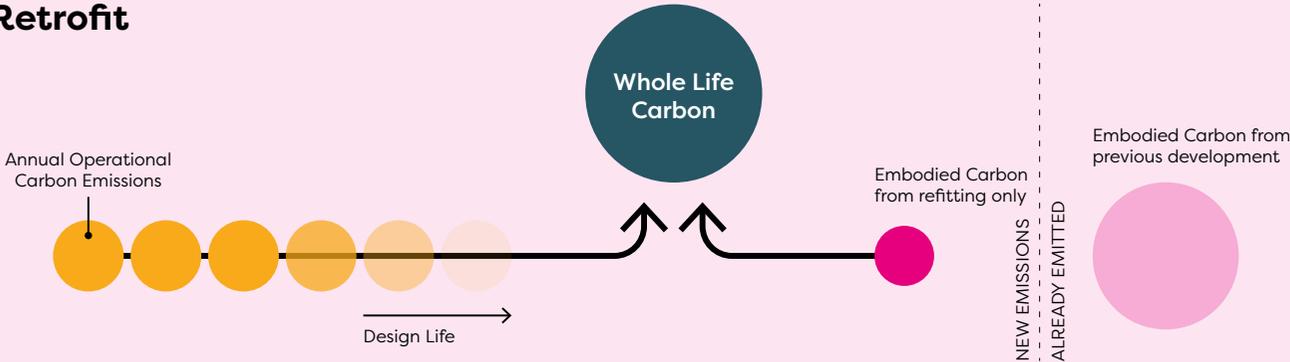
FIGURE 17: WHOLE LIFE CARBON CONSIDERATIONS FOR NEW BUILD AND RETROFIT DEVELOPMENT OPTIONS

# Materials, Construction & Waste

## Undertake a Whole Life Carbon Assessment New Build



## Retrofit



<sup>3</sup>UK Green Building Council, 2023

## Materials, Construction & Waste

**2.44** ‘Embodied carbon’ is the emissions produced during the construction of a building. It is a ‘one-off’ cost and is the result of materials production (such as concrete), energy for machinery and fuel used by construction and delivery vehicles.

**2.45** Although a new building may be more operationally efficient than an old building, this may be offset by the emissions generated in its construction, leading to an overall increase when considered as lifetime or whole life carbon emissions.

*Whole Life Carbon = embodied carbon + (operational carbon x years of operation)*

**2.46** It is important to assess whole life carbon when considering development projects if there is an alternative scheme available that would, for instance, re-use an existing building. It is often the case that refitting and adapting existing buildings has lower whole life emissions. Before considering new construction, it is important to consider through such analysis whether retrofit of an existing building would be feasible or would result in higher whole life carbon emissions compared to new-build.

### Follow the Construction Hierarchy

**2.47** The whole-life carbon approach underpins a hierarchy of construction that should be considered early in the design process:

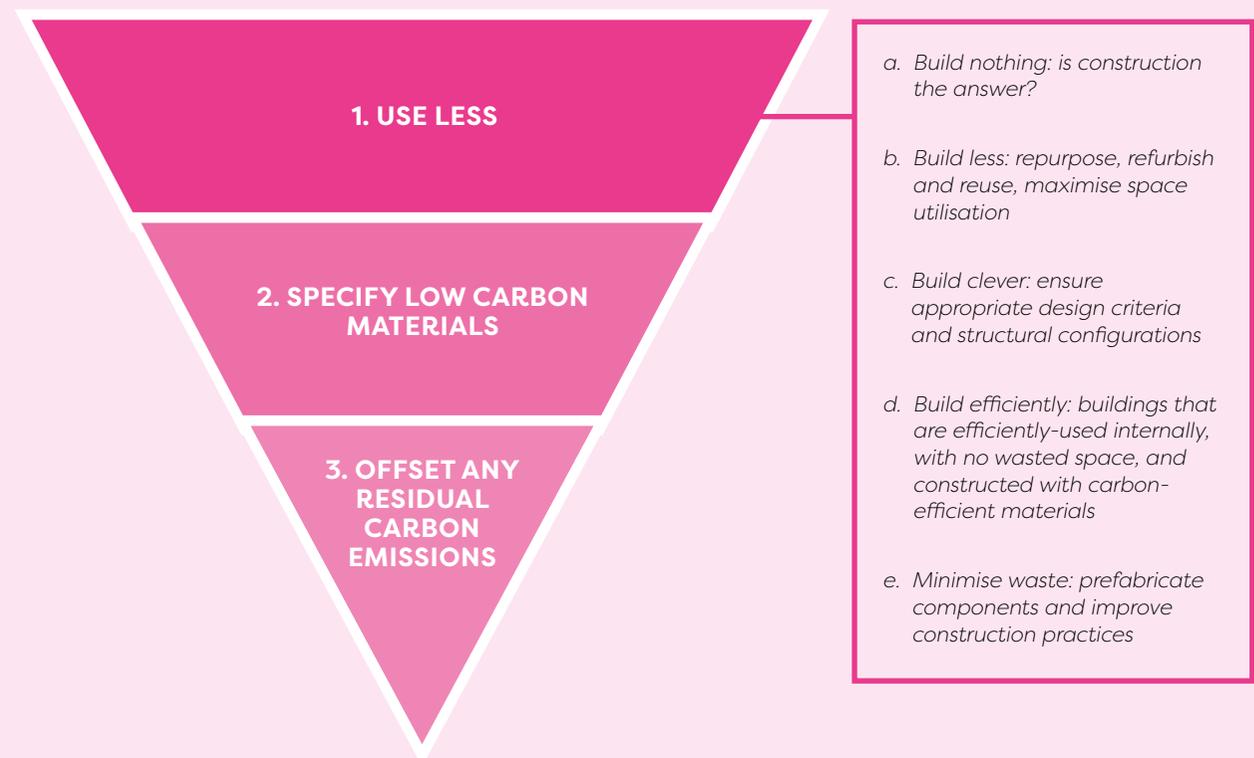
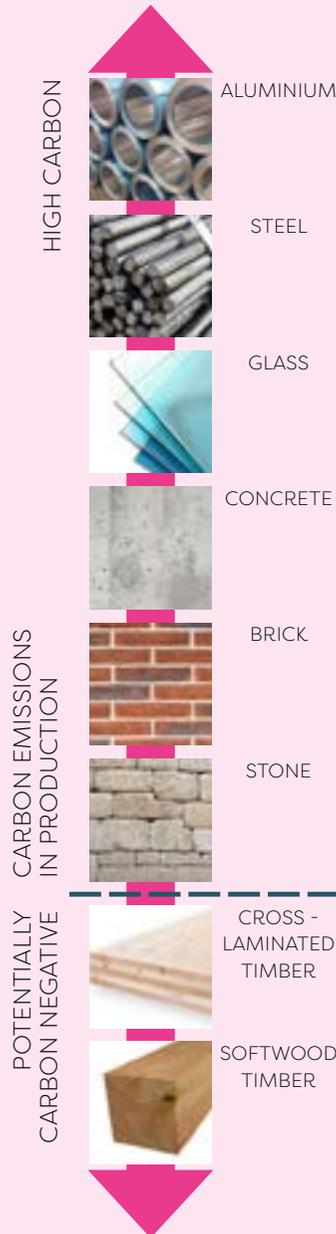


FIGURE 18: CONSTRUCTION HIERARCHY

## Materials, Construction & Waste

FIGURE 19: RELATIVE EMBODIED CARBON OF DIFFERENT CONSTRUCTION MATERIALS



### Use low-carbon construction materials

**2.48** If a new building or new construction is necessary, it is essential to consider the carbon emissions embodied within materials used, either through their sourcing, mining, or creation (e.g. concrete). Each material should be chosen only where it is the best at performing the function it is required to perform with the lowest whole life carbon impact. It may be that higher embodied carbon materials are chosen due to their roles in reducing operational carbon over a building's lifetime.

**2.49** As a preference, locally-sourced or reclaimed materials should be used. Materials chosen should also prioritise potential for recycling and reuse, to ensure that in the future the embodied carbon impact of their reuse is as close to zero as possible.

**2.50** Low carbon materials include (in this order) softwood timber, cross-laminated timber, stone and brick. These are also able to be re-used and recycled - see figure 19.

**2.51** Higher carbon materials include (highest first) aluminium, steel, glass and concrete. Glass and concrete are usually unable to be reused, and steel and aluminium typically require energy-intensive recycling and transformation processes before reuse.

### Choose appropriate materials for a changing climate

**2.52** Extreme weather events such as high temperatures or intense rainfall will demand a new approach to material selection. Materials with a high specific heat capacity can smooth out variations in temperature internally and provide effective insulation, retaining heat in the winter and taking longer to heat up in the summer. This must be balanced against their tendency to re-radiate heat, which could create unpleasant microclimate effects in prolonged periods of hotter weather.

**2.53** Permeable materials for the public realm and landscaped spaces can reduce the effects of intensive rainfall events. This can include permeable paving or green materials for new driveways and other hard landscaped areas. See 'Water' on page 33 for more information.

### Further Reference

**2.54** More detailed information on these topics can be found in the following guidance:

-  [UK Green Building Council: The Retrofit Playbook](#)
-  [LETI Climate Emergency Design Guide](#)
-  [UK Green Building Council Net Zero Carbon Buildings Framework](#)

## Green Infrastructure

**2.55** Vegetation, planting, trees, green open spaces and natural habitats are a vital tool in mitigating climate change, and in ensuring that our places remain habitable in extreme weather. Together they are known as green infrastructure.

### *What is biodiversity net gain?*

*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. Biodiversity net gain delivers measurable improvements for biodiversity by creating or enhancing habitats in association with development. Biodiversity net gain can be achieved on-site, off-site or through a combination of on-site and off-site measures.*

*Under the Environment Act 2021, all planning permissions granted in England (with a few exemptions) except for small sites will have to deliver at least 10% biodiversity net gain when the regulations come fully into force. Large scale or strategic BNG projects may be able to trade 'credits' with other projects that are unable to deliver BNG on-site, under certain circumstances.*

## Green Infrastructure

### **Capture carbon in natural habitats**

**2.56** Healthy natural habitats and ecosystems absorb carbon, through plants that 'fix' carbon as part of their natural growth. Woodland habitats can provide a particularly effective ongoing carbon capture sink, especially as the trees begin to reach maturity after 5-10 years. Other habitats that provide good carbon capture are freshwater wetlands, which can be incorporated into sustainable drainage systems and river restoration/nature recovery schemes.

**2.57** Where possible, and where this is compatible with overall biodiversity strategies, such habitats should be considered as part of a proposal's overall climate change approach and corresponding biodiversity net gain strategy.

## Green Infrastructure

### **Ensure biodiversity resilience**

**2.58** As the climate changes, plants and animal species will have to adapt to the new conditions. Natural ecosystems are complex and interconnected, and this will have a number of effects, many of which cannot be anticipated fully:

- Native species being unable to thrive in the new climate and dying off
- The arrival of non-native species, which may disrupt local ecosystems. An example is invasive species of beetle or other insects such as Oak Processionary Moth that can destroy natives trees
- Some native species becoming dominant, leading to a loss of biodiversity and poor natural ecosystems

**2.59** When creating new habitats, or including trees or planting in new proposals, biodiversity resilience should be considered. This means choosing a mix of plants that are likely to be robust to changes, and avoiding monocultures that may be vulnerable to invasive species. Planting species chosen should also aim to reduce water consumption.



FIGURE 20: EXAMPLES OF GREEN INFRASTRUCTURE IN THE PUBLIC REALM (SHEFFIELD)



### ***Provide green infrastructure throughout built environment***

2.60 The inclusion of green infrastructure throughout the built environment has wider benefits relevant to climate change and environmental sustainability, that include:

- Reduction in temperatures of spaces during hot weather, through shade and the evaporation cooling effect of trees and planting
- More effective management of heavy rainfall events through absorption
- Improvements in air quality
- Biodiversity improvements and the potential to link habitats through networks of green infrastructure

2.61 Proposals should consider how to integrate green infrastructure throughout to maximise these effects.

FIGURE 21: EXAMPLES OF GREEN INFRASTRUCTURE IN DEVELOPMENT (MALMO, SWEDEN TOP & CENTRE, DERWENTHORPE BOTTOM)

## Green Infrastructure

### **Further Reference**

2.62 More detailed information on these topics can be found in the following guidance:

-  [NHBC Biodiversity in new housing developments](#)
-  [Building with Nature](#)
-  [Natural England Green Infrastructure Guidance](#)
-  [Forest Research: The Urban Tree Manual](#)
-  [Healthy Streets for Surrey Design Guide](#)
-  [Surrey Sustainable Drainage Systems Guidance](#)

### **MAJOR APPLICATIONS: DEMONSTRATING SUSTAINABILITY**

-  Urban Greening Factor (UGF) as set by Natural England
-  DEFRA Biodiversity Net Gain Metric v4

## Water

## Water

2.63 Extreme weather events that cause heavy and sudden rainfall are likely to increase under conditions of climate change. Effective management of water flows through urban environments will be even more crucial, to protect homes and critical infrastructure and ensure the public realm remains usable.

2.64 Although the intensity of water in storm events will increase, climate change is likely to make overall water resources scarcer, especially in the south-east of England. This means that efficiency of water usage is essential for all new development.

### Integrate Sustainable Drainage Systems (SuDS)

2.65 All proposals should follow the principles of sustainable drainage systems, by absorbing and slowing down runoff through permeable surfaces, before allowing it to be filtered and infiltrate slowly. By doing so, expensive and complex engineering approaches that require much ongoing maintenance can be avoided. SuDS mimic natural drainage processes to reduce the effect on the quality and quantity of run-off from developments and provide amenity and biodiversity benefits.

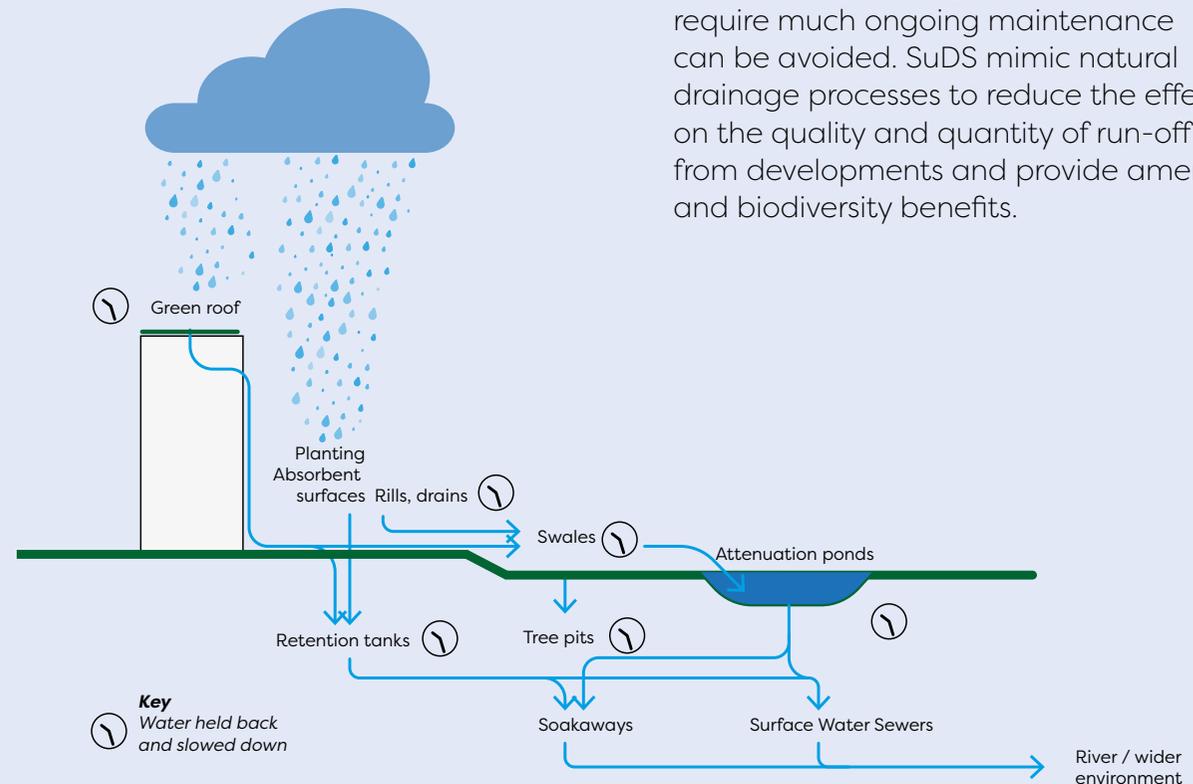


FIGURE 22: PRINCIPLES OF URBAN SUSTAINABLE DRAINAGE SYSTEMS

## Water

2.66 SuDS are applicable to green-field development and to built-up areas. They can take many forms to adapt to their context, and can form an attractive part of the public realm and create new habitats for wildlife. Existing built-up areas can be adapted to improve their performance, through changes to the public realm or green roofs and walls. The use of rain gardens within built-up areas can provide an attractive and visible feature of a more natural surface water management chain.



FIGURE 23: EXAMPLES OF SUSTAINABLE DRAINAGE SYSTEMS IN BUILT UP AREAS (TOP ROW: MALMO, SWEDEN; UPTON, NORTHAMPTON, HAMMARBY, SWEDEN) (BOTTOM ROW: CAMBRIDGE; MALMO, SWEDEN; MALMO, SWEDEN; NEWPORT)

## Water

### Calculate your Urban Greening Factor

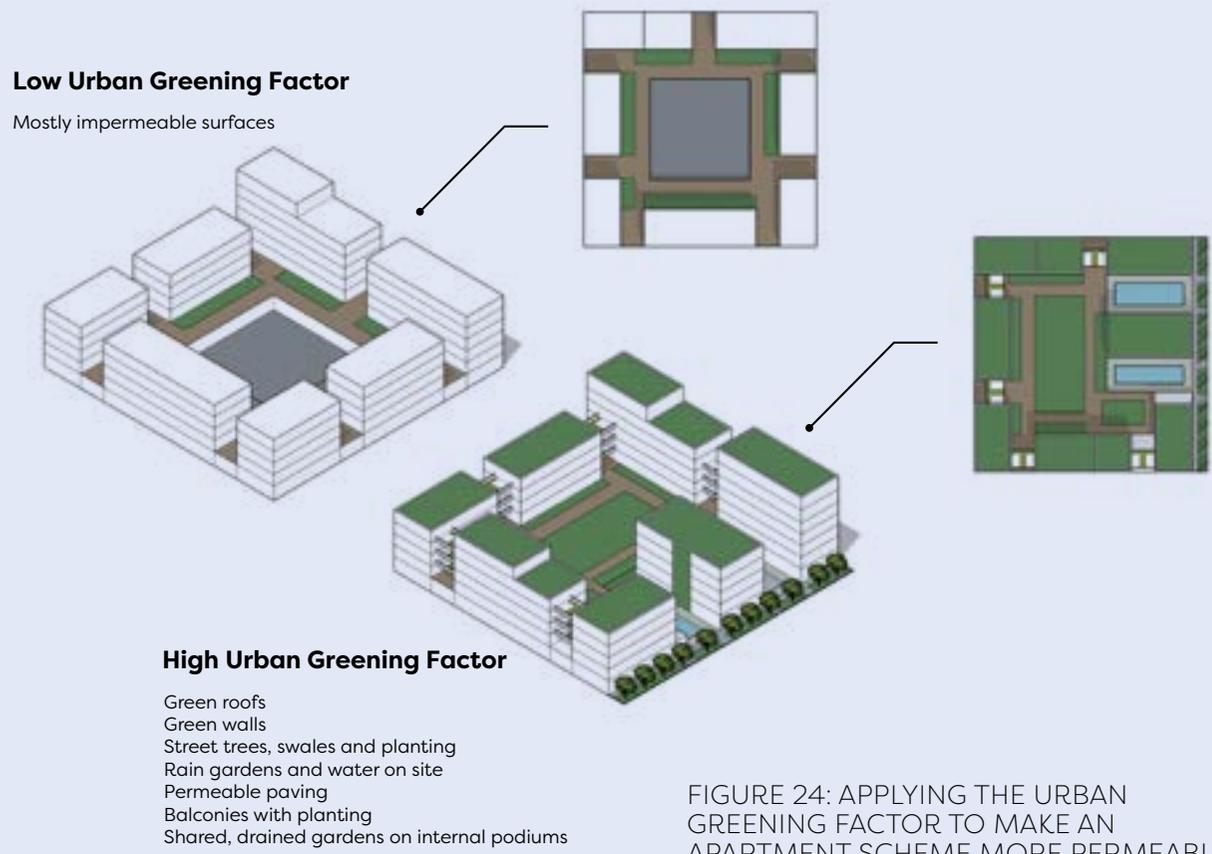


FIGURE 24: APPLYING THE URBAN GREENING FACTOR TO MAKE AN APARTMENT SCHEME MORE PERMEABLE FOR WATER

2.67 The Urban Greening Factor (UGF) is a tool endorsed by Natural England to help understand how permeable proposals are and helps design teams maximise green infrastructure and sustainable drainage systems throughout new development. It can provide multiple benefits, including amenity space, biodiversity net gain, green open spaces and improving air quality, as well as surface water management. It can also, when integrated with the design process, create an attractive and comfortable environment for everyone using the space.

2.68 The UGF (and similar tool Green Space Factor) have been adopted as part of the London Plan, with a recommendation to deliver a score of 0.4 on major residential developments, and 0.3 on commercial developments. Although it is not a formal policy requirement in Spelthorne, its use is encouraged as part of a holistic design process.

**Be efficient with water**

FIGURE 25: HOME RAINWATER CAPTURE SYSTEMS



FIGURE 26: LARGE-SCALE WATER RECYCLING SCHEME (EDDINGTON, CAMBRIDGE)

- 2.69** One of the likely effects of climate change is a reduction in overall rainfall in the south-east of England, an area already under water supply pressure. New residential development is strongly encouraged to demonstrate water efficiency measures in their design that limit piped water usage to 110 litres per day per resident.
- 2.70** In residential settings, the vast majority of water usage is within the home, and only a small proportion in the garden<sup>4</sup>. Water efficiency measures should concentrate on appliances, such as the toilet, showers, washing machines and dishwashers. Renovation and retrofit projects are often an opportunity to upgrade fixtures and fittings, and new build construction should fit low-flow and efficient appliances as standard.
- 2.71** Outdoors, the installation of water butts connected to downpipes, or more comprehensive rainwater recycling systems in larger schemes to provide 'grey' water for compatible uses should be considered.

<sup>4</sup>*At Home With Water, Energy Saving Trust (2013)*

- 2.72** The public realm requires water for planting and street trees. Species that require less watering should be considered, balancing other needs set out earlier under Green Infrastructure.

**Further Reference**

- 2.73** More detailed information on these topics can be found in the following guidance:

-  [Ciria: The SuDS Manual](#)
-  [Urban Design London: Designing Rain Gardens - A Practical Guide](#)
-  [Mayor of London - Urban Greening Factor SPG](#)
-  [Natural England - Urban Greening Factor and Green Infrastructure Framework](#)
-  [Surrey SuDS Guidance](#)

**MAJOR APPLICATIONS:  
DEMONSTRATING SUSTAINABILITY**

-  Urban Greening Factor (UGF)
-  BREAAAM (Water Efficiency Credits)

## Space & Place Design

**2.74** As the climate changes, extreme weather events are more likely to occur, along with the potential for extended heatwaves that will make being outdoors uncomfortable or even impossible for some groups. As well as buildings, our outdoor spaces will need to change to consider this future.

### *Keep spaces usable and enjoyable in hotter weather*

**2.75** Access to shade on streets and in spaces is an essential part of adapting our public realm to a hotter future. This can be accomplished through:

- Natural approaches: e.g. street trees and planting
- Temporary approaches: e.g. canopies, parasols and other shading in the public realm
- Built form approaches: e.g. arcades and overhangs on building ground floors along streets, canopies on bus stops and covered seating areas

**2.76** The cooling effects of water, green infrastructure and appropriate materials in public and amenity spaces have been noted in other themes above. They can play multiple roles, including surface water management, areas for relaxation, gathering, children's play, space for exercise and recreation.

## Space & Place Design

**2.77** Seating and access to drinking water is essential to ensure that groups who may be more vulnerable in the heat can continue to confidently use the public realm in hotter weather.

**2.78** Frequent crossings along streets are essential, so that people can easily cross to the shadier side in hot weather. It is important to ensure that any unshaded areas are interspersed with areas of shade to break up longer periods in the sun.

### **Further Reference**

 [Healthy Streets for Surrey Design Guide](#)

### **MAJOR APPLICATIONS: DEMONSTRATING SUSTAINABILITY**



WELL Certification

# | 3.0 IN PRACTICE

3.1 This chapter sets out a series of examples of how the principles of the Core Themes can be successfully implemented in practice. The measures shown are not illustrative and not exhaustive. There may be other appropriate ways of achieving the principles of the Core Themes, especially with the use of constantly improving technology.



## The Neighbourhood

3.2 Tackling climate change will require a whole systems approach, with changes working together to achieve the overarching goal. A sustainable, low-carbon neighbourhood is one where most daily travel can be undertaken by walking, cycling or other active travel modes. Low or zero-carbon public transport is reliable, convenient and serves the places people want to go to. Regular destinations such as shops, schools and community facilities are near to people's homes, and there is sufficient

density of people within their catchment to support them viably. Nature is strengthened and woven throughout, to ensure resilience in future climate change scenarios.

3.3 This section illustrates how climate change can be considered and designed for at a neighbourhood level, and is directly relevant for large-scale applications, and for strategic changes such as transport infrastructure and public open spaces.

	Homeowner Building extensions Self-build 1-2 new dwellings	Minor Development 3-10 dwellings or less than 1000m <sup>2</sup> floorspace	Major Development More than 10 dwellings or more than 1000m <sup>2</sup> floorspace
<b>The Neighbourhood</b> Creating sustainable places at larger scales			●
<b>The Street</b> Public realm, mixed-use and commercial developments		●	●
<b>The Building</b> Detailed design measures for efficient and resilient buildings	●	●	○ Yes for full/reserved matters applications



*'The Neighbourhood'*

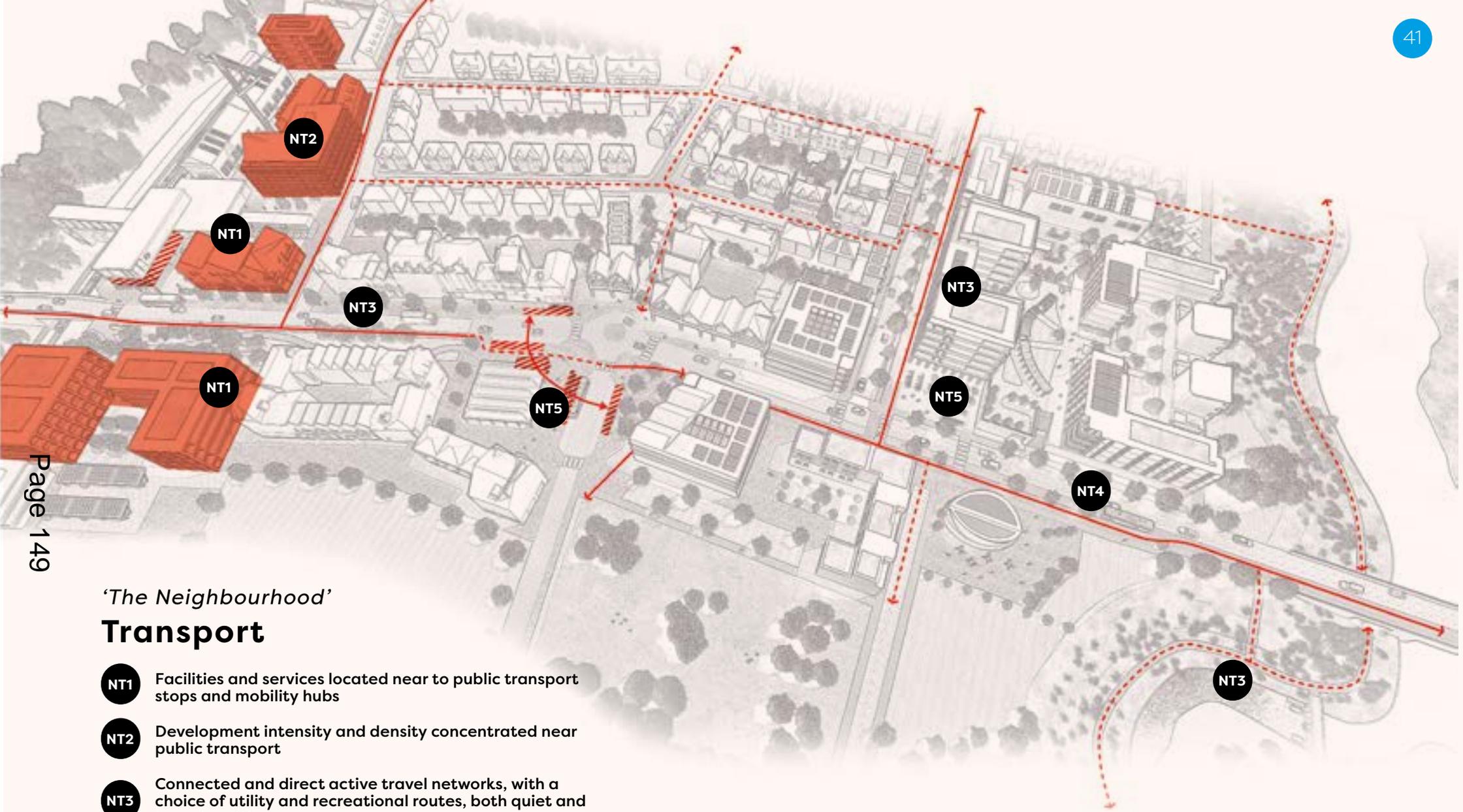
- 1** People can move around safely and conveniently by walking, cycling and other active travel means, making seamless connections to public transport for longer journeys
- 2** Facilities are available locally and concentrated near public transport so they can be accessed widely without needing a car
- 3** Resilient green infrastructure is integrated throughout, providing water management, microclimate improvements and habitats for nature
- 4** Energy generation and distribution of cleanly-generated heat is considered and shared at a neighbourhood level

FIGURE 27: THE NEIGHBOURHOOD

## 'The Neighbourhood' Energy

- NE1** Block and massing layout to maximise solar gain and efficiency, allowing sunlight to warm all homes
- NE2** District heating networks in denser areas connected to energy centres with clean sources, or the potential to move to clean sources
- NE3** Strategic opportunities for energy generation such as PV panels on roofs of major commercial and civic buildings
- NE4** Opportunities for community-run hydro power generation on rivers, integrated with nature recovery schemes

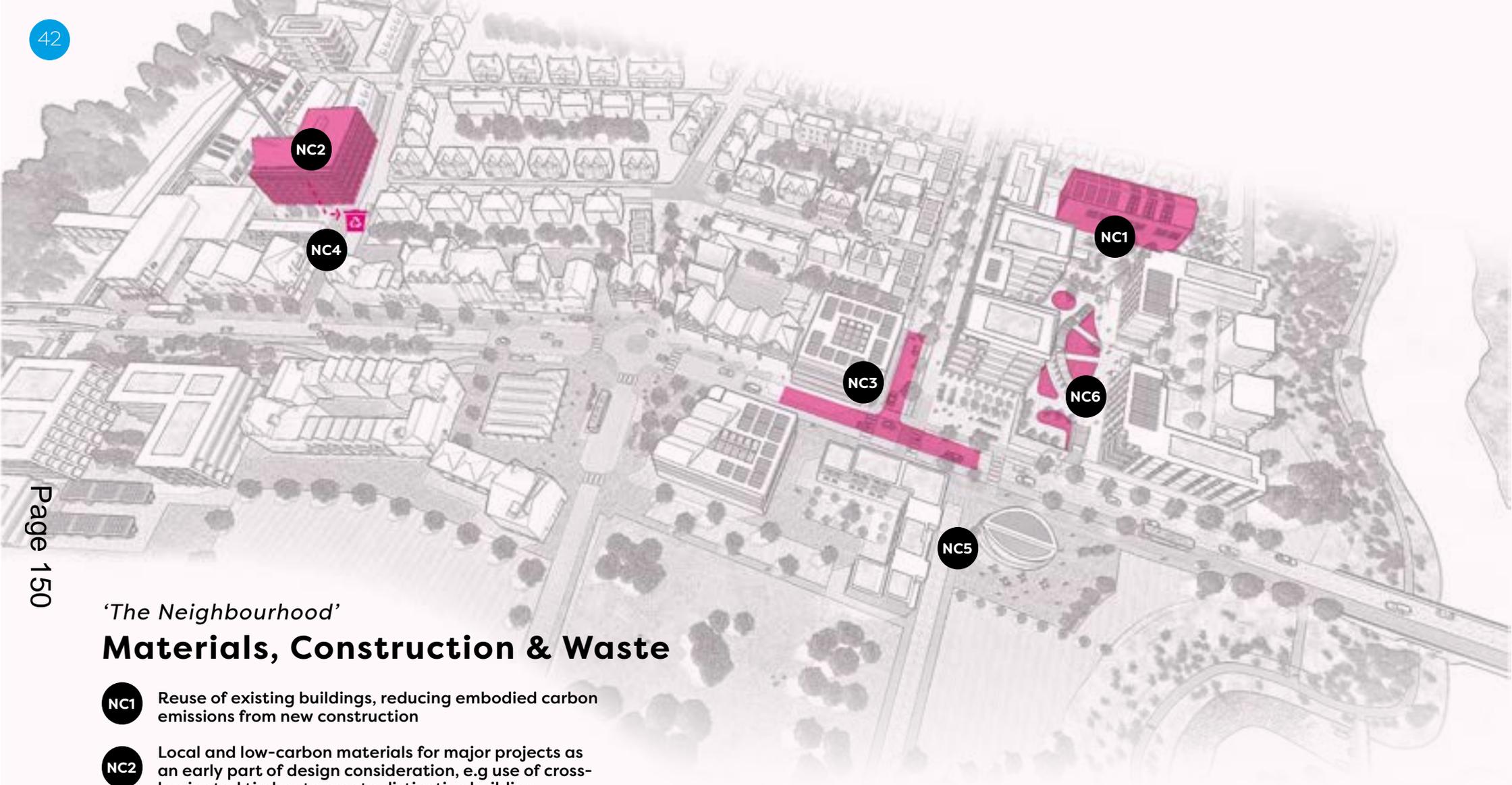
FIGURE 28: THE NEIGHBOURHOOD - ENERGY



*'The Neighbourhood'*  
**Transport**

- NT1** Facilities and services located near to public transport stops and mobility hubs
- NT2** Development intensity and density concentrated near public transport
- NT3** Connected and direct active travel networks, with a choice of utility and recreational routes, both quiet and busy, for different users
- NT4** Public transport prioritisation measures such as bus lanes and bus gates on key corridors and at junctions
- NT5** Network of mobility hubs and interchanges between sustainable travel modes of different scales
- NT6** Travel planning and sustainable transport subsidy support [not on diagram]

FIGURE 29: THE NEIGHBOURHOOD - TRANSPORT



### *'The Neighbourhood'*

## Materials, Construction & Waste

- NC1** Reuse of existing buildings, reducing embodied carbon emissions from new construction
- NC2** Local and low-carbon materials for major projects as an early part of design consideration, e.g. use of cross-laminated timber to create distinctive building
- NC3** Reductions in the infrastructure that produces most carbon emissions in construction, e.g. excessive highways and use of tarmac
- NC4** Construction waste management plans that recycle and retain materials on site where possible
- NC5** Sharing and local recycling between facilities and businesses – e.g. reuse of coffee waste for fertiliser, feeding local food production, to be sold in local cafés
- NC6** Permeable materials in public realm

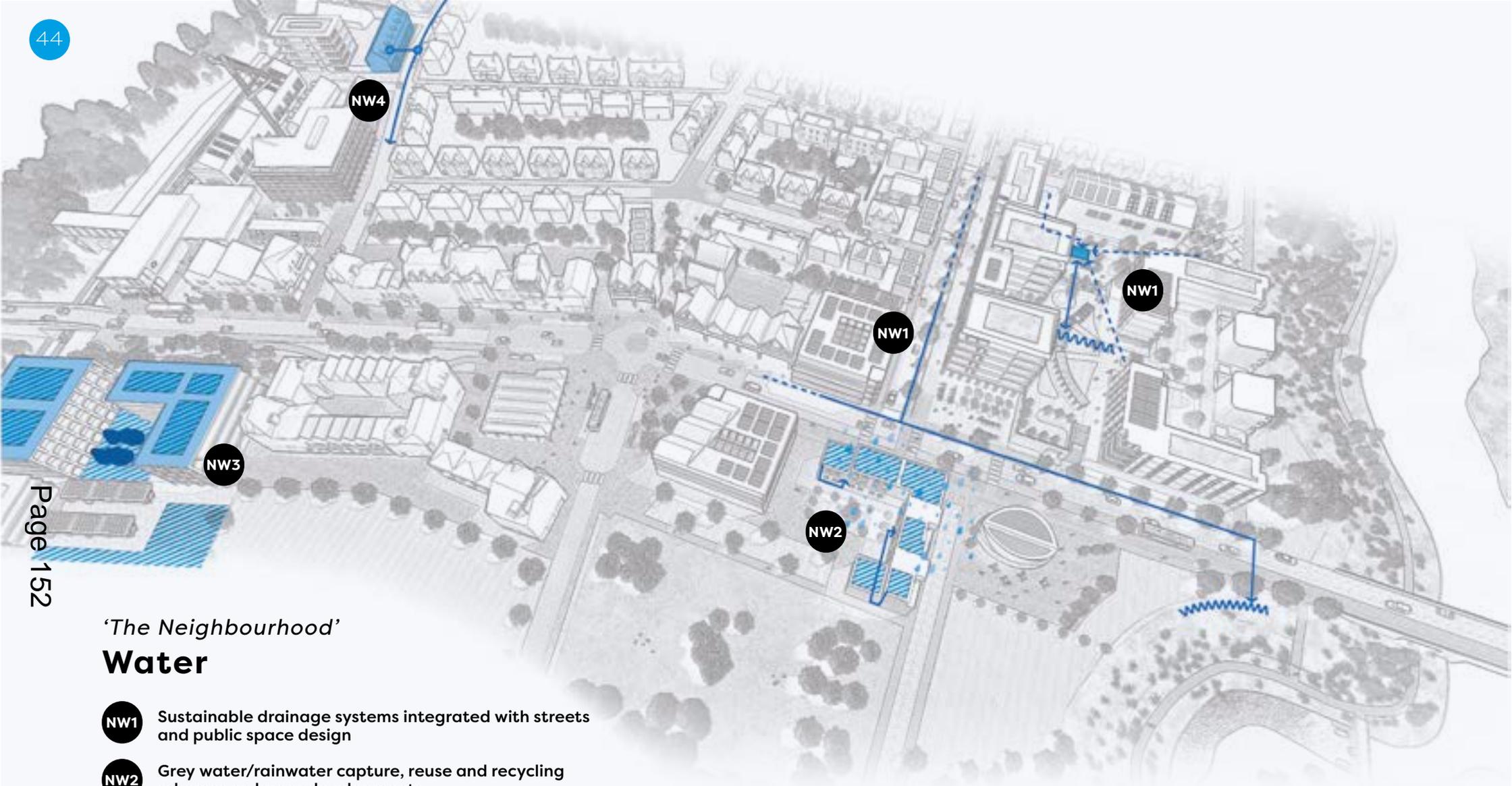
FIGURE 30: THE NEIGHBOURHOOD - MATERIALS, CONSTRUCTION & WASTE



*'The Neighbourhood'*  
**Green Infrastructure**

- NG1** Natural habitats that can capture carbon, such as woodlands and wetlands
- NG2** Opportunities for nature recovery and biodiversity net gain, such as wildflower meadows and river course restoration
- NG3** Connecting habitats together, especially within identified Biodiversity Opportunity Areas e.g through linear parks in the public realm, or transforming existing grey infrastructure (surface parking, excess road space) into green links
- NG4** Strengthening existing habitats for the future through the trading of BNG credits for schemes that cannot provide new habitats on site
- NG5** Use of street trees, swales, verges and other green infrastructure to provide urban habitat links and ecology 'sinks'

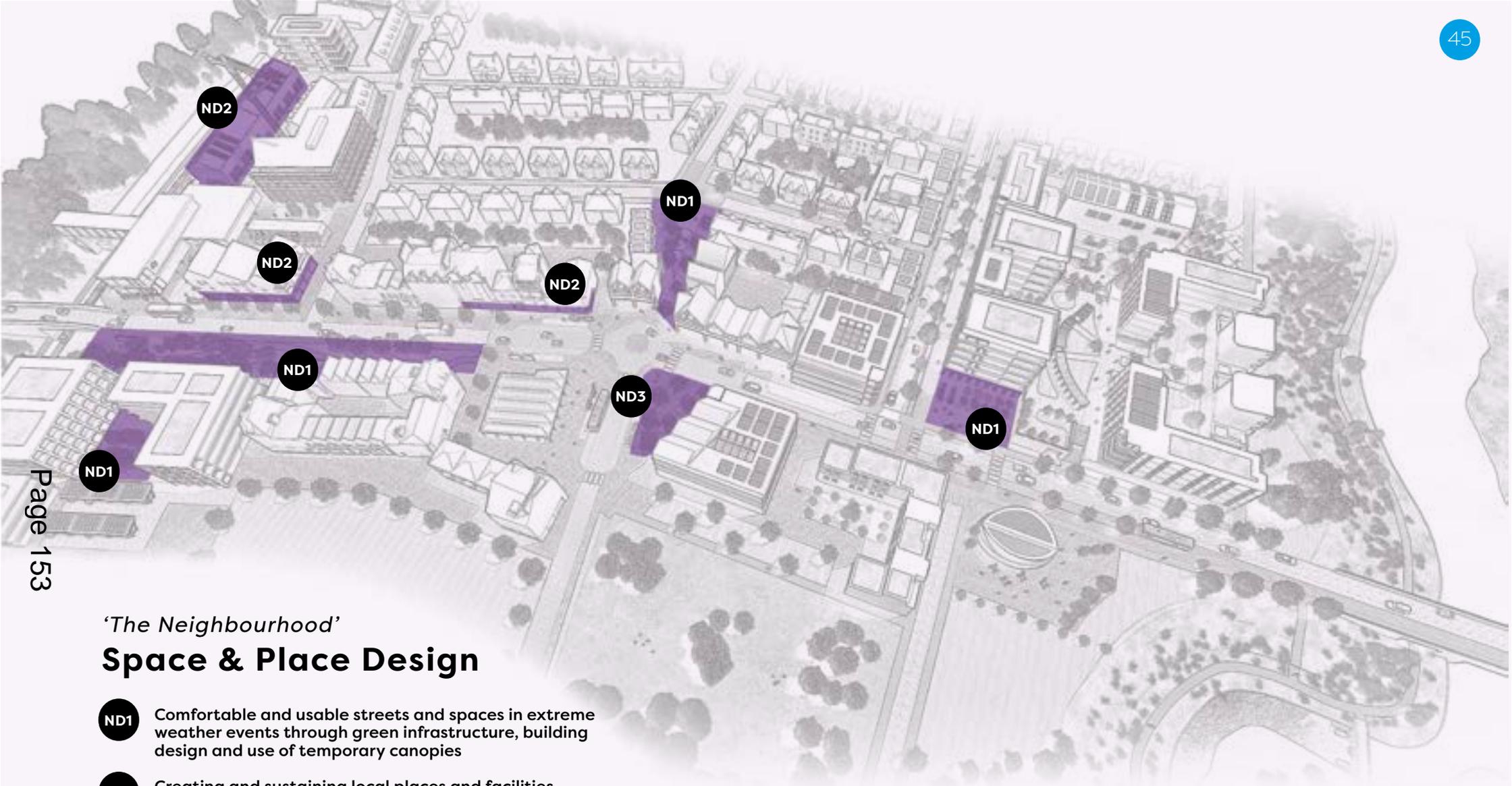
FIGURE 31: THE NEIGHBOURHOOD - GREEN INFRASTRUCTURE



## 'The Neighbourhood' Water

- NW1** Sustainable drainage systems integrated with streets and public space design
- NW2** Grey water/rainwater capture, reuse and recycling schemes on larger developments
- NW3** Scheme calculation of Urban Greening Factor to demonstrate surface water permeability and maximise absorption of water on site
- NW4** Water use targets for new developments and water metering

FIGURE 32: THE NEIGHBOURHOOD - WATER



*'The Neighbourhood'*  
**Space & Place Design**

- ND1** Comfortable and usable streets and spaces in extreme weather events through green infrastructure, building design and use of temporary canopies
- ND2** Creating and sustaining local places and facilities to minimise need to travel using the 20 minute neighbourhood principle
- ND3** Use of water and natural habitats in the public realm as part of distinctive placemaking approaches

FIGURE 33: THE NEIGHBOURHOOD - SPACE & PLACE DESIGN

## The Street

3.4 At a more detailed level, climate change will have practical implications for many types of development, and the weather conditions that streets and spaces will need to deal with, if our communities are to remain liveable and enjoyable into the future.

3.5 There are also major opportunities to deliver clean energy, be more efficient, and for our streets to be more walkable and friendly to active travel and sustainable modes.

3.6 This section illustrates in practice measures in the public realm (e.g. on the street), and key features within larger developments such as a commercial office building or apartments.

	<b>Homeowner</b> Building extensions Self-build 1-2 new dwellings	<b>Minor Development</b> 3-10 dwellings or less than 1000m <sup>2</sup> floorspace	<b>Major Development</b> More than 10 dwellings or more than 1000m <sup>2</sup> floorspace
<b>The Neighbourhood</b> Creating sustainable places at larger scales			●
<b>The Street</b> Public realm, mixed-use and commercial developments		●	●
<b>The Building</b> Detailed design measures for efficient and resilient buildings	●	●	○ Yes for full/reserved matters applications



FIGURE 34: THE STREET

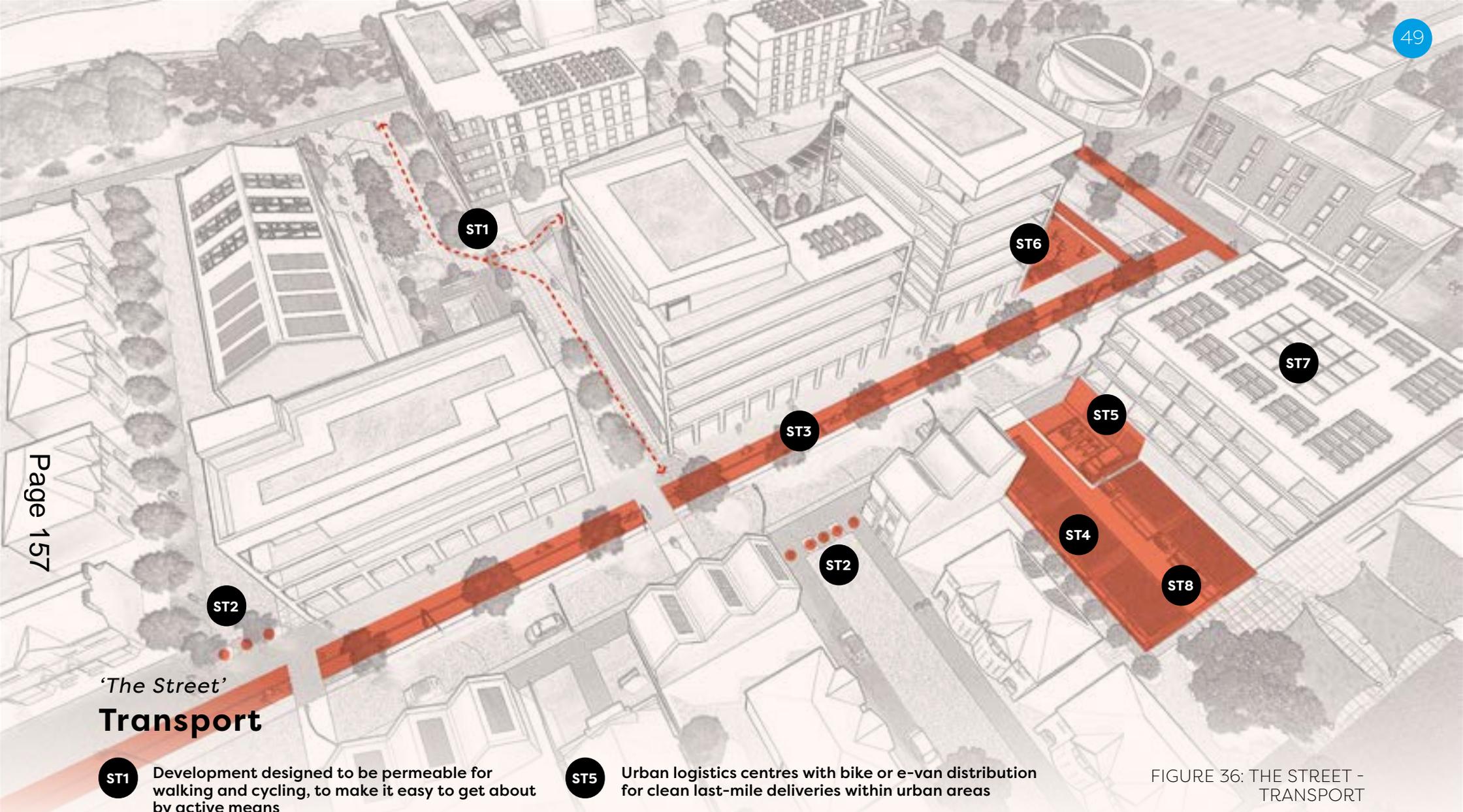
*'The Street'*

- 1 Lifetime carbon calculations demonstrate the benefit of retention and refurbishment of existing buildings, especially those that can become key local landmarks and community assets
- 2 Natural light and ventilation, material choices and layout helps buildings reduce their energy needs in both cold and hot weather
- 3 All streets and spaces integrate active travel, green infrastructure and water management and consider how to adapt to extreme weather events in the future

## 'The Street' Energy

- 
- SE1** Make connections to existing district heat networks
  - SE2** PV solar energy generation above surface car parks, bus shelters or cycle parking
  - SE3** Energy efficient LED street lighting
  - SE4** Central heat sources such as heat pumps using clean energy within apartment or commercial buildings, or reusing waste heat from adjacent sources
  - SE5** Dual aspect buildings and building design to allow for passive air circulation
  - SE6** Skylights, openings and depths designed to allow natural light into buildings to minimise need for artificial lighting
  - SE7** Shading and ventilation of indoor and outdoor spaces to minimise overheating risk in hotter weather
  - SE8** High efficiency / low energy HVAC and MEP systems within ground floor retail uses
  - SE9** Shading for larger windows on south-facing aspects via the use of brise soleil
  - SE10** Appropriate glazing percentage depending on elevation aspect to maximise solar gain, with shading options to prevent overheating
  - SE11** PV panel installation on roofs
  - SE12** Demand-responsive building HVAC systems to lower energy usage when spaces have fewer occupants

FIGURE 35: THE STREET - ENERGY

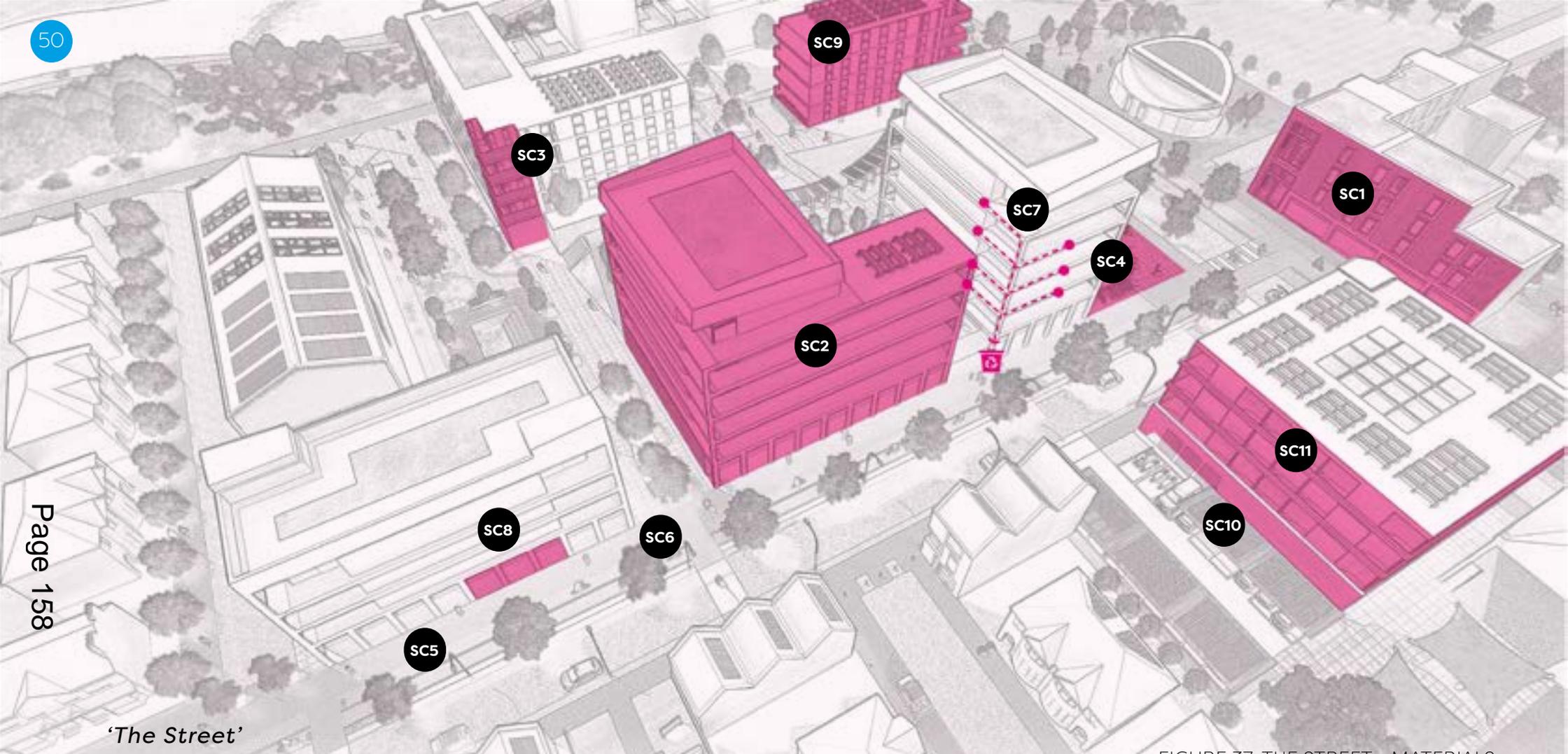


*'The Street'*  
**Transport**

- ST1** Development designed to be permeable for walking and cycling, to make it easy to get about by active means
- ST2** Streets prioritised for through movement for walking and cycling, to create calm and attractive residential streets, friendly to active travel
- ST3** Segregated active travel provision on main roads
- ST4** Design of proposals to demonstrate how any car parking provided can be repurposed in a lower-car future, e.g. for new homes, open space or other uses

- ST5** Urban logistics centres with bike or e-van distribution for clean last-mile deliveries within urban areas
- ST6** Provision of convenient visitor cycle parking within the public realm and as part of commercial or apartment developments
- ST7** Shower and changing facilities within commercial buildings, with secure employee cycle parking
- ST8** Car parking of commercial buildings located so as not to dominate frontage, and make arrival by active modes the easiest option

FIGURE 36: THE STREET - TRANSPORT

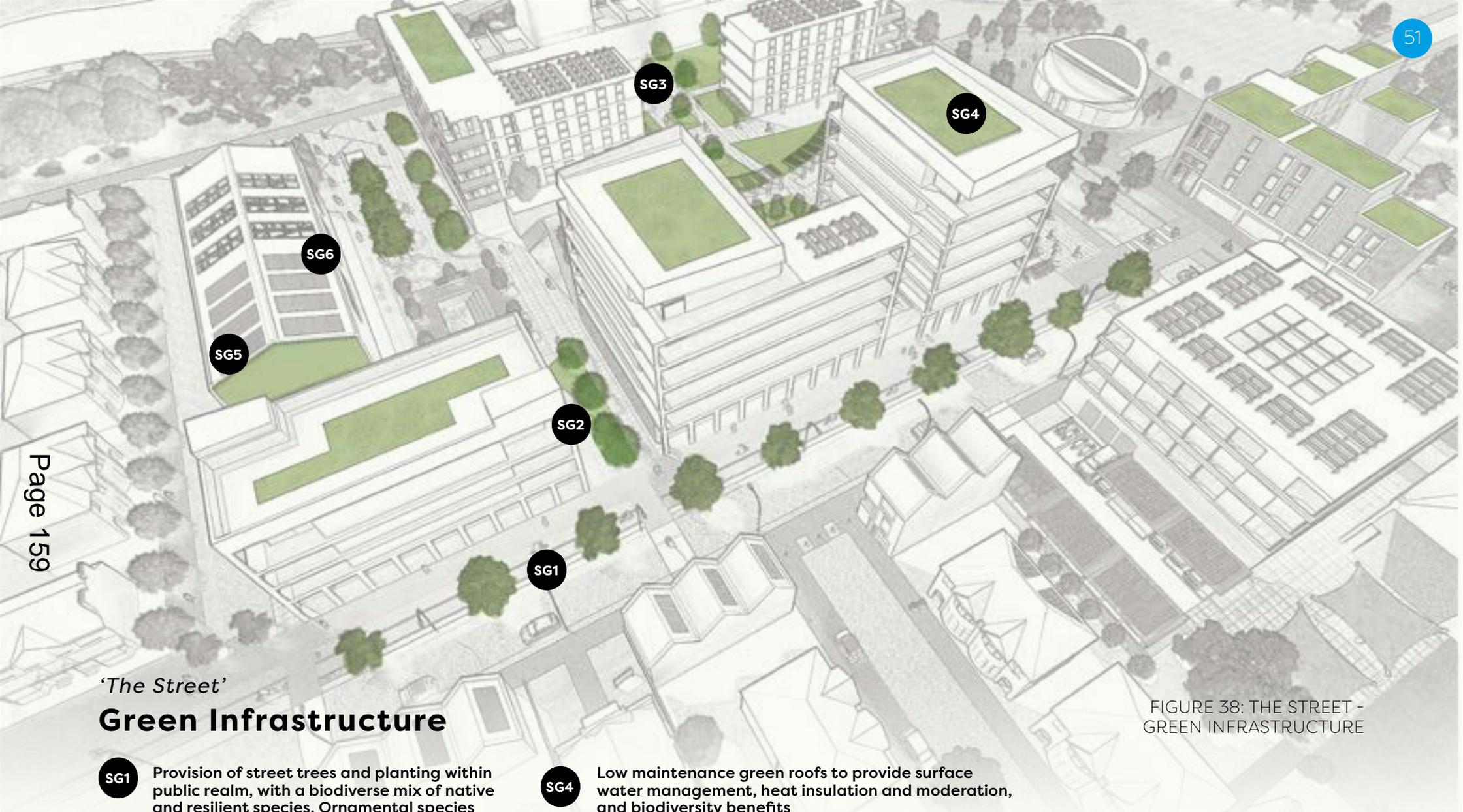


### 'The Street'

## Materials, Construction & Waste

- SC1** Prioritisation of low-carbon and locally sourced materials in design
- SC2** Balance massing and embodied carbon, recognising that high-rise construction requires use of higher carbon materials and operational emissions. Density can often be achieved more sustainably at lower heights.
- SC3** Demolition processes to consider and prioritise potential for reuse of usable materials in new construction
- SC4** Long-lasting public realm using low-carbon or reclaimed materials with a long design life
- SC5** Shared utility channels to minimise waste and emissions involved in digging up services
- SC6** On-street waste and recycling facilities
- SC7** Communal or shared waste management systems in apartment buildings, with enough space within apartments for waste and recycling
- SC8** Flexible ground floor design with ceiling height of 4m+ to accommodate a range of future uses without reconstruction
- SC9** Massing and design that considers future redevelopment needs, allowing smaller-scale change of individual buildings rather than complete demolition of entire block
- SC10** Design for future commercial adaptability without demolition, considering appropriate dimensions, access to services, space for future HVAC and MEP
- SC11** Design of buildings to allow for disassembly and reuse of materials in the future

FIGURE 37: THE STREET - MATERIALS, CONSTRUCTION & WASTE



*'The Street'*

### Green Infrastructure

- SG1** Provision of street trees and planting within public realm, with a biodiverse mix of native and resilient species. Ornamental species used sparingly for clear purposes as part of placemaking.
- SG2** Wildflower and species-rich grassland in public realm and green open spaces
- SG3** Inclusion of natural habitats within amenity space in developments

- SG4** Low maintenance green roofs to provide surface water management, heat insulation and moderation, and biodiversity benefits
- SG5** Low maintenance green walls to provide biodiversity benefits and improve urban microclimate
- SG6** Retention of habitats for birds and bats etc through the re-use of existing buildings

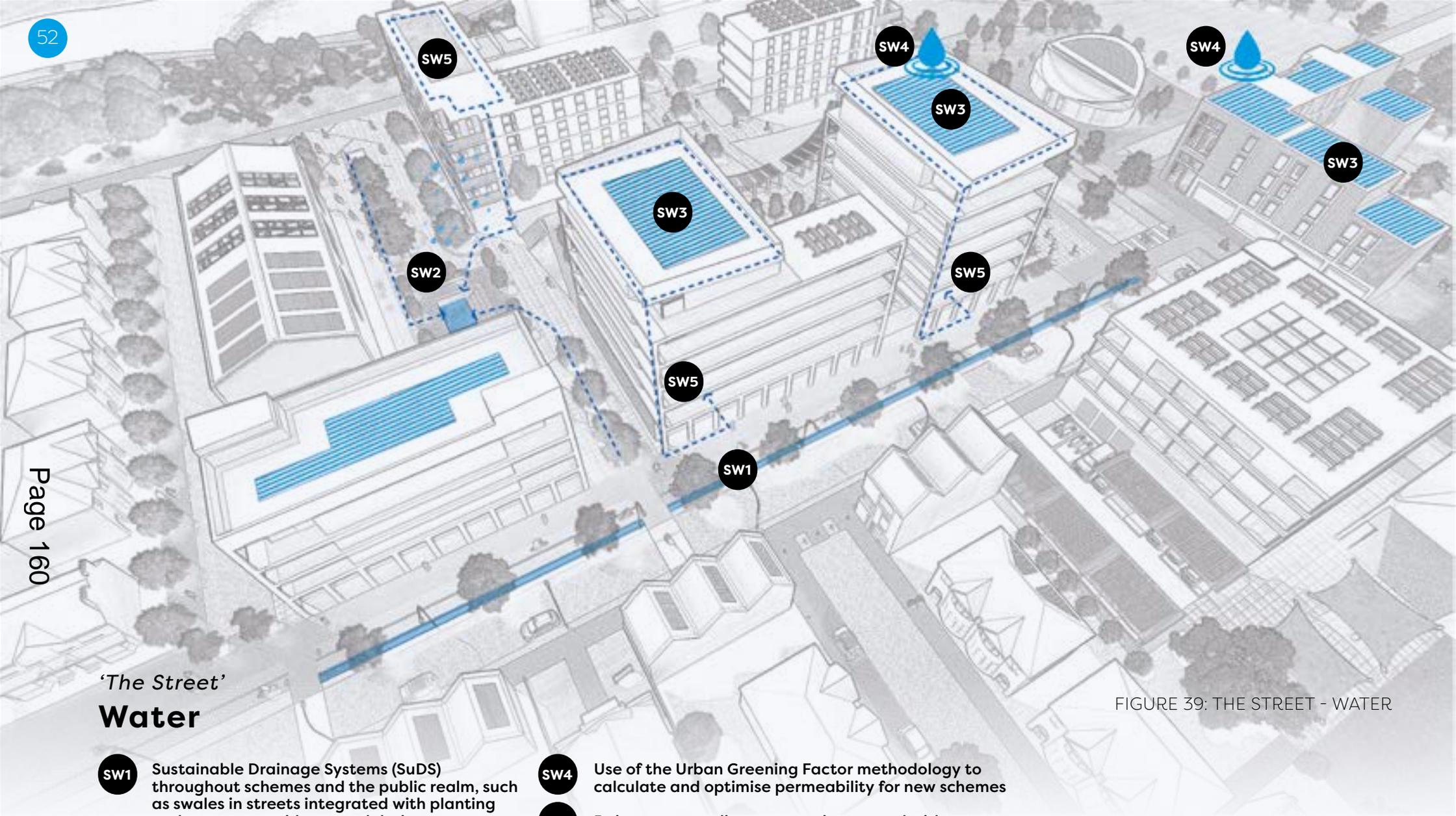
FIGURE 38: THE STREET - GREEN INFRASTRUCTURE

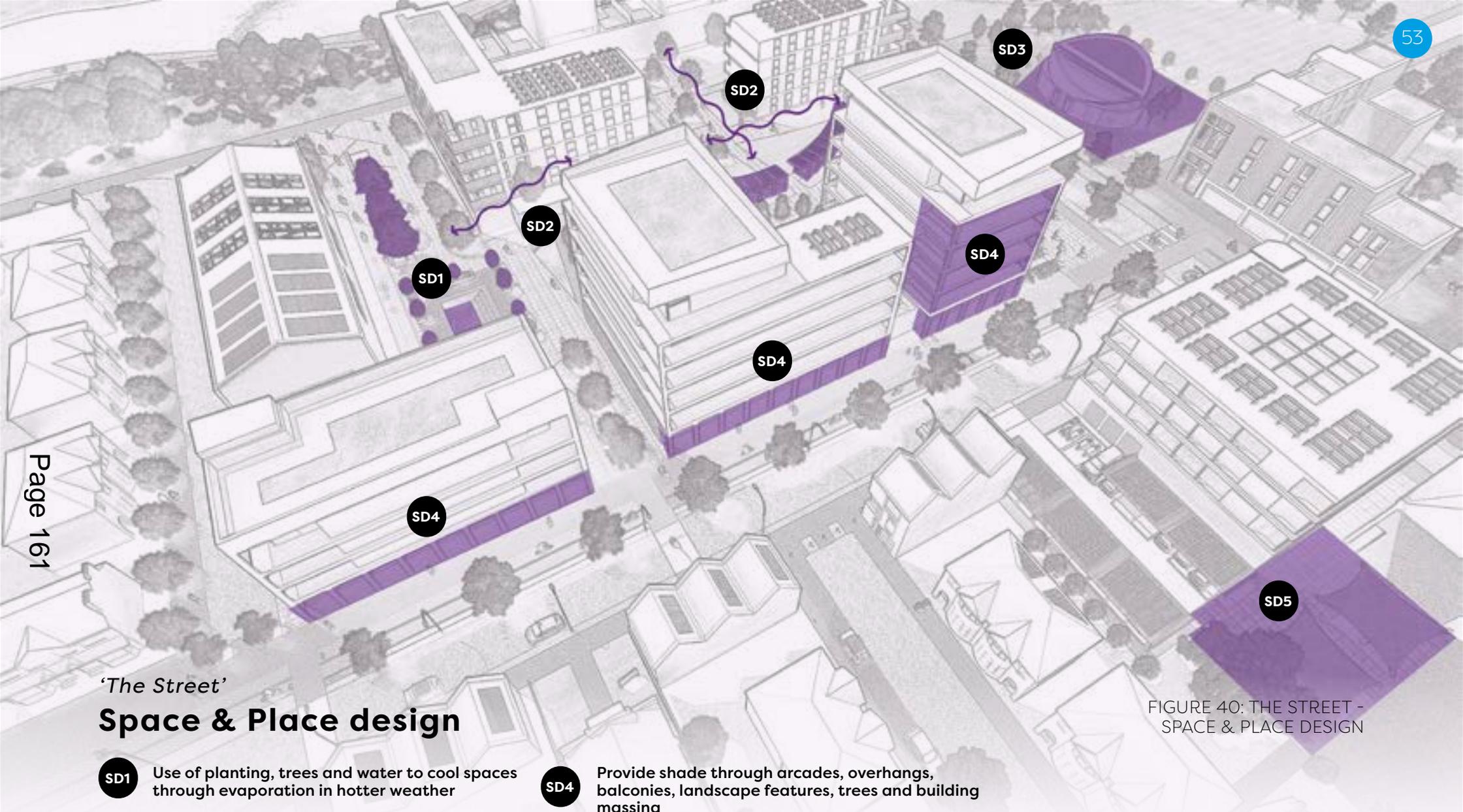
## 'The Street' Water

- SW1** Sustainable Drainage Systems (SuDS) throughout schemes and the public realm, such as swales in streets integrated with planting and trees to provide natural drainage
- SW2** Use of rills, channels, rain gardens, permeable paving and natural features to absorb and channel surface water, and enhance the quality and amenity of spaces
- SW3** Low maintenance green roofs to absorb water

- SW4** Use of the Urban Greening Factor methodology to calculate and optimise permeability for new schemes
- SW5** Rainwater recycling systems, integrated with green roofs or other absorption systems, to provide grey water to developments for non-potable use

FIGURE 39: THE STREET - WATER





*'The Street'*

# Space & Place design

- SD1** Use of planting, trees and water to cool spaces through evaporation in hotter weather
- SD2** Spaces with a comfortable micro-climate under anticipated climate change scenarios, considering solar heating, wind and wind patterns from surrounding buildings and shading, to ensure spaces can be used throughout the year
- SD3** Use of appropriate materials and green infrastructure to reduce local heat island/ microclimate effects

- SD4** Provide shade through arcades, overhangs, balconies, landscape features, trees and building massing
- SD5** Shaded outdoor amenity areas for commercial buildings

FIGURE 40: THE STREET - SPACE & PLACE DESIGN

## The Building

3.7 Sustainability begins at home, and the vast majority of existing houses in Spelthorne could be adapted to improve their energy efficiency and improve their resilience to future extreme weather conditions. Many of these improvements have a financial and quality of life benefit for homeowners. New homes should be constructed to the highest standards of efficiency and sustainability.

3.8 The in practice measures illustrated here are not exhaustive, but are intended to give an overview of potential measures that could be considered and incorporated as part of an extension or adaptation project on an existing home, or as a key part of the design of a new home.

3.9 Two residential homes are illustrated (an extension to an existing house and a new home), but many of the examples features are applicable to other types of building, such as commercial or apartment buildings. These include efficiency measures, water efficiency measures and resilient green infrastructure measures.

	<b>Homeowner</b> Building extensions Self-build 1-2 new dwellings	<b>Minor Development</b> 3-10 dwellings or less than 1000m <sup>2</sup> floorspace	<b>Major Development</b> More than 10 dwellings or more than 1000m <sup>2</sup> floorspace
<b>The Neighbourhood</b> Creating sustainable places at larger scales			●
<b>The Street</b> Public realm, mixed-use and commercial developments		●	●
<b>The Building</b> Detailed design measures for efficient and resilient buildings	●	●	○ Yes for full/reserved matters applications



**'The Building'**

- 1 New build homes are constructed to the highest efficiency standards and integrate energy generation and storage into the design
- 2 Existing homes are retrofitted as part of extensions and alterations to provide an overall benefit to homeowners

FIGURE 41: THE BUILDING

## 'The Building' Energy

- HE1** Air or ground source heat pump installation
- HE2** Low-temperature heating system (e.g. underfloor)
- HE3** Modern building insulation in walls, windows and lofts
- HE4** Design responds to building orientation to place appropriate glazing, shading and ventilation on correct aspects
- HE5** Modern high performance double or triple glazing
- HE6** Photovoltaic (PV/solar) panel or PV tile installation on roofs
- HE7** Smart metering and energy monitoring
- HE8** In-home battery energy storage, integrated with PV installation
- HE9** Installation of new energy-efficient appliances and LED lighting

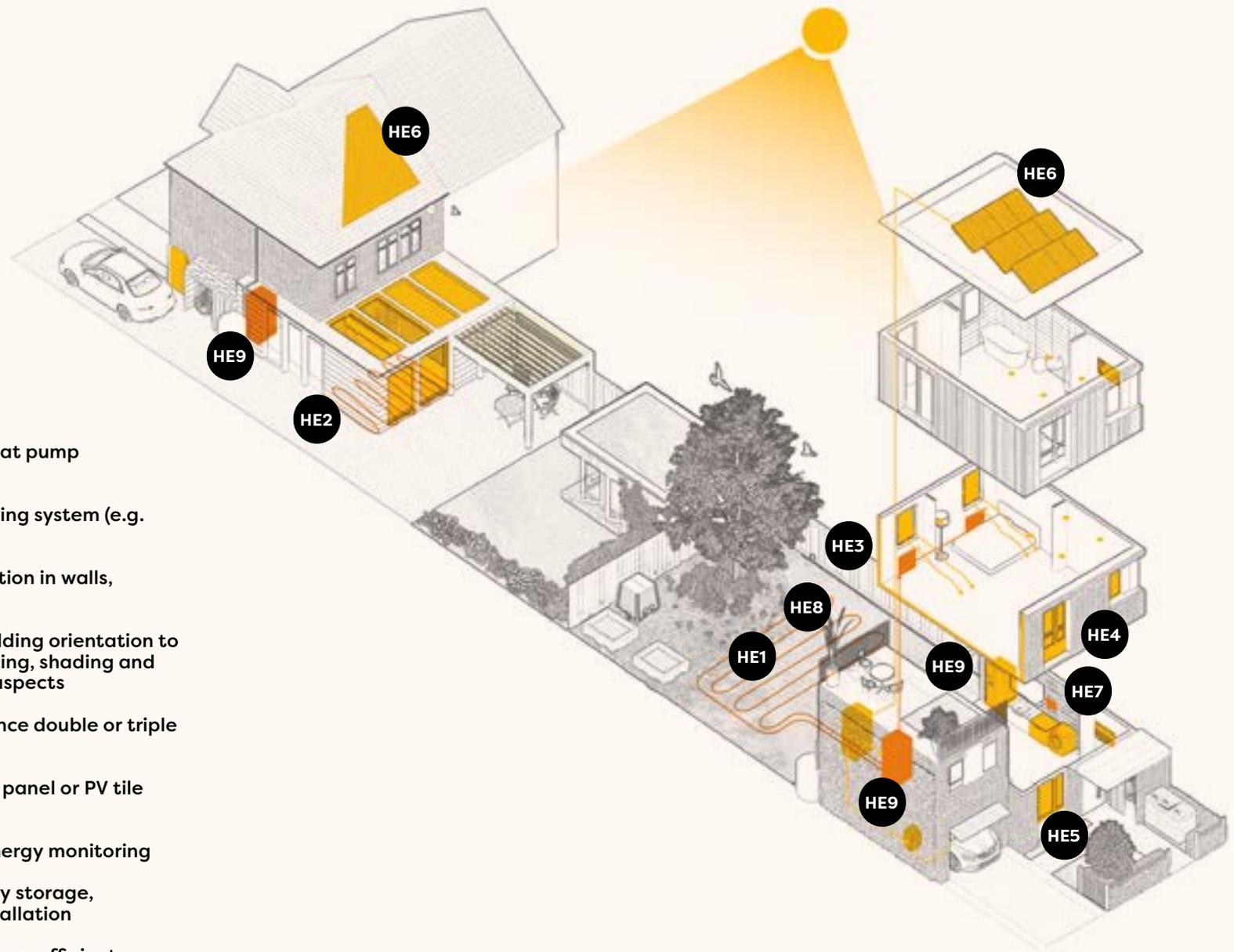


FIGURE 42: THE BUILDING - ENERGY

# 'The Building' Transport

- HT1** Accessible, secure cycle storage near front door
- HT2** Electric vehicle (EV) charging provision
- HT3** Space for home working to reduce commuting needs
- HT4** Dropped kerbs to retain level footway/cycleway (mobility kerbs and quadrant kerbs)



FIGURE 43: THE BUILDING - TRANSPORT

*'The Building'*

## Materials Construction & Waste

- HC1** Low-carbon construction materials such as timber
- HC2** Local construction materials
- HC3** Designed for future adaptability and change without reconstruction
- HC4** Internal recycling storage with sufficient space
- HC5** External bin store with space for recycling and easy access for collection
- HC6** External space for composting

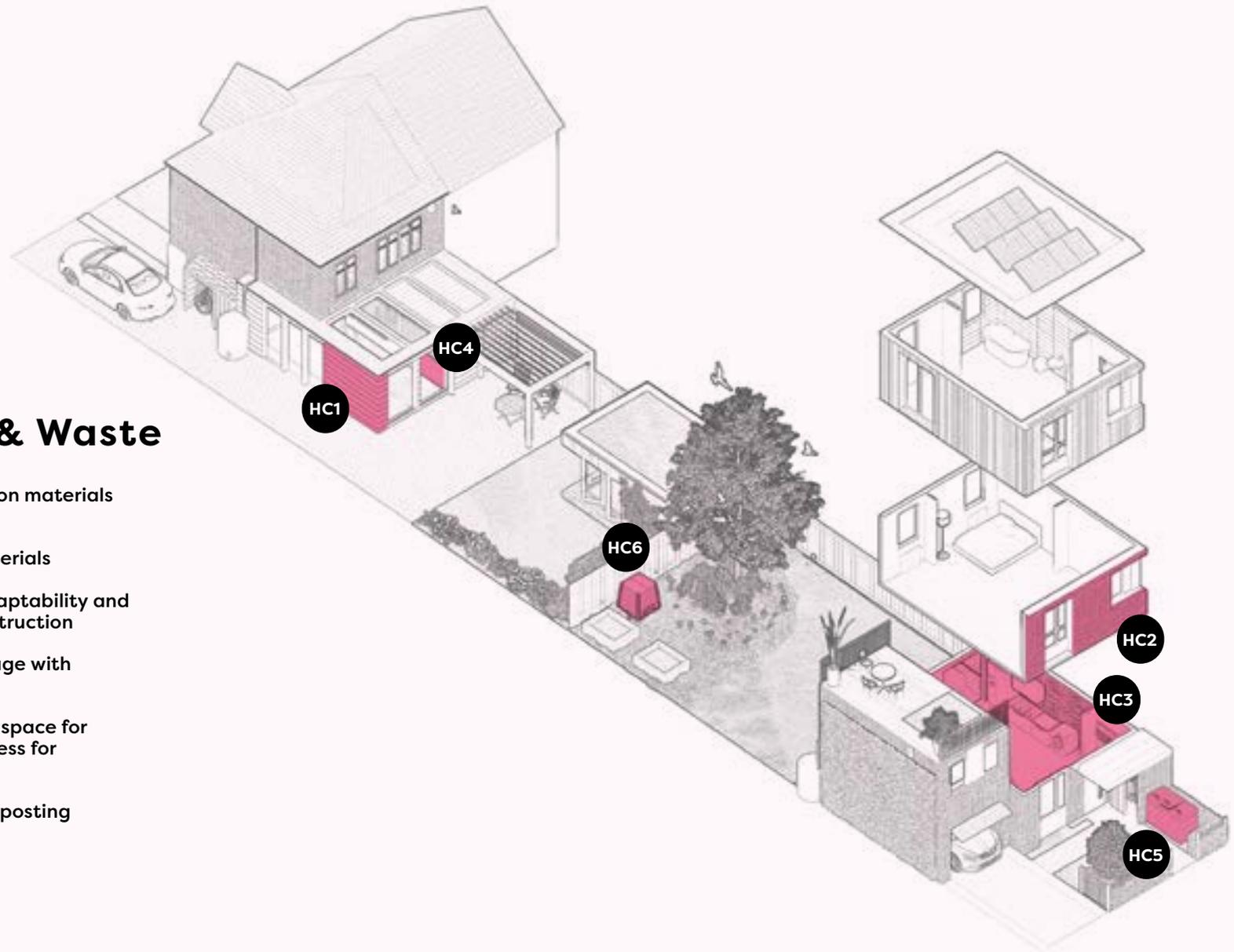


FIGURE 44: THE BUILDING - MATERIALS, CONSTRUCTION & WASTE

*'The Building'*  
**Green Infrastructure**

- HG1** Bird boxes
- HG2** Bat boxes
- HG3** Bee bricks
- HG4** Hedgehog holes/highways through fences
- HG5** New and / or retained native species hedges, planting and nature areas in gardens
- HG6** Green roofs on homes and outbuildings



FIGURE 45: THE BUILDING - GREEN INFRASTRUCTURE

## 'The Building'

### Water

- HW1** Rainwater harvesting systems (e.g. water butts)
- HW2** Separate grey water and fresh water systems
- HW3** Design to minimise water use and smart metering
- HW4** Retain / expand permeable outdoor areas e.g. lawn, flowerbeds, permeable paving where applicable
- HW5** Drought tolerant plants used, where applicable
- HW6** Water efficient washing machine and dishwasher / Low-flow toilets, taps, and showerheads
- HW7** Leak detection system

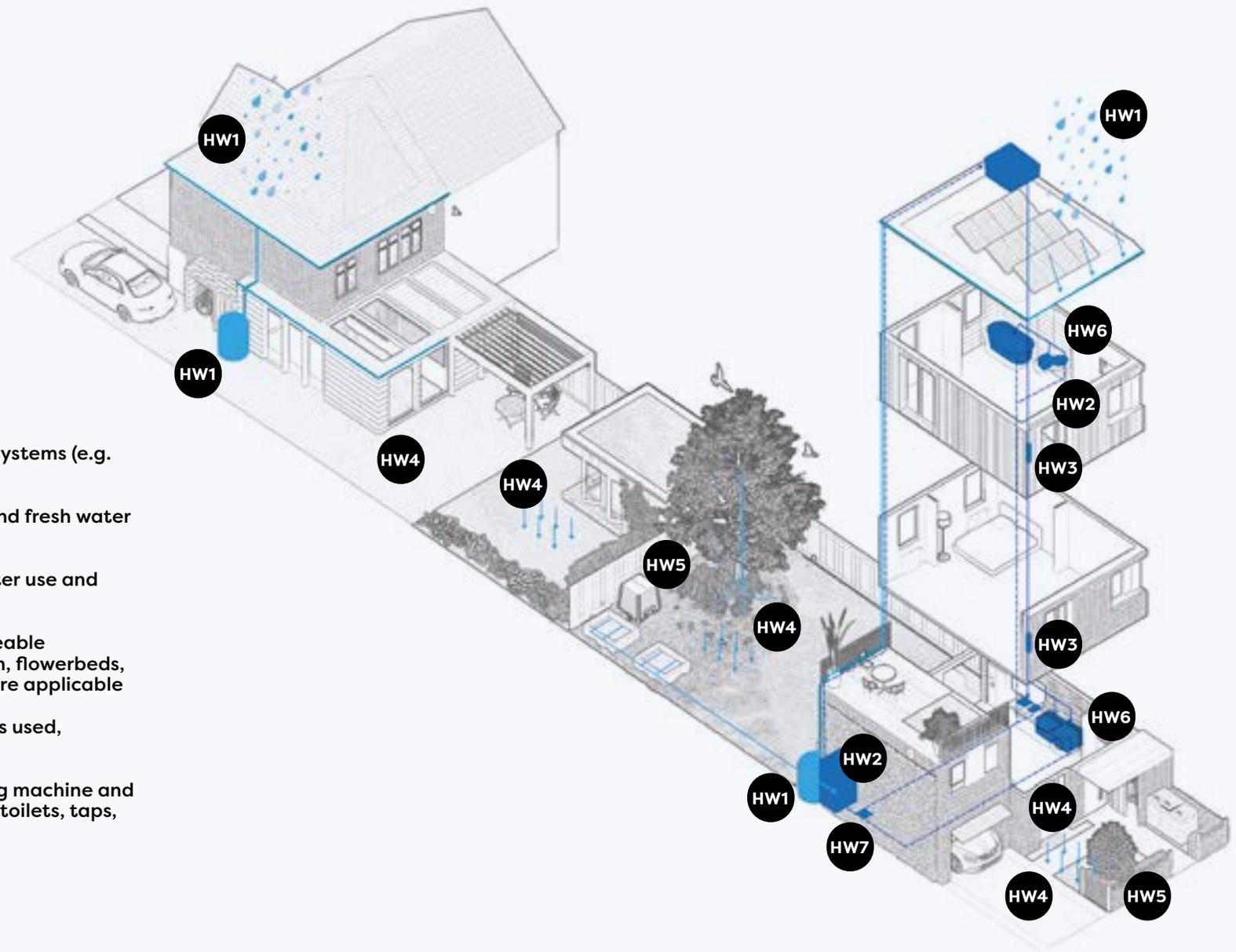


FIGURE 46: THE BUILDING - WATER

*'The Building'*

# Space & Place Design

- HD1** Shaded outdoor areas and amenity space
- HD2** Shaded and sheltered space outside front doors
- HD3** Use of materials to reduce local heating and microclimate effects, especially on south-facing aspects



FIGURE 47: THE BUILDING - SPACE & PLACE DESIGN

# | 4.0 SUBMITTING YOUR APPLICATION



**4.1** As part of your submitted application, you should complete the appropriate Climate Change Checklist to demonstrate how you have considered the core themes, and what measures you have implemented, depending on the type of application.

## Using the checklists

**4.2** There are three checklists available:

- **Homeowner applications:** for extension or alteration works on an existing property. This checklist is also appropriate for proposals of 1-2 new or replacement dwellings.
- **Minor applications:** for 3 to 10 homes or less than 1,000m<sup>2</sup> of commercial space
- **Major applications:** for more than 10 homes or more than 1,000m<sup>2</sup> of commercial space.

**4.3** The homeowner and minor applications checklists focus on whether measures set out in the 'In Practice' section of

this guidance have been applied. This gives a good assessment of whether climate change mitigation and adaptation measures have been applied on schemes of this scale, and gives practical assistance to homeowners and applicants considering how to make their proposals more sustainable.

**4.4** The major application checklist focuses on how applicants have considered and responded to the principles set out in the 'Core Themes' section of this guidance. It asks applicants where in their application they have provided key information that demonstrates how the principles have been addressed. This approach recognises that contexts will vary, and that it is more important to demonstrate how principles have been observed and considered by design teams than providing a prescriptive tick-list.

**4.5** Bringing these aspects together into checklists, will aid the applicant in understanding what is required and will help speed up the assessment of a scheme's compliance with the SPD.

### **Additional documents required**

4.6 For major applications, you will be expected to provide:

- An Energy / Sustainability Statement – setting out how you have met efficiency and clean energy targets at a scale that is appropriate to the type of development proposed.
- A Construction and Waste Management Statement – detailing how recycling and waste will be handled.
- Utilities Statement – detailing the required utility networks, their availability, and incorporated usage efficiency measures for the proposed development.
- Drainage Strategy – details of the incorporation of sustainable urban drainage (SuDs) into the proposal.
- Travel Plan – provide details of sustainable transport measures for new residents / employees / customers of the development, as relevant.
- Green Infrastructure Strategy – details of the existing and proposed

landscaping incorporated into the proposal and how this has considered biodiversity, the public realm, climate resilience, as applicable.

- Design & Access Statement – this should include a section on sustainability and how this has factored into the design evolution and the accessibility of the proposed development.`
- 4.7 For the most up-to-date requirements for each planning application type, please refer to SBC's Local List of Information Requirements or the most recent validation list available: <https://www.spelthorne.gov.uk/article/17678/Making-an-application>

### **What to expect from SBC**

4.8 Once you have prepared your planning application, completed the requisite documents (including the relevant climate change checklist) and submitted this to the Council, usually via the Planning Portal, the application will be validated. If the required plans, documents and the checklist are not included, then this may be requested from you prior to the validation of your planning application.

4.9 The consultation period will normally last 21 days and consultees / neighbours / statutory parties will assess and comment on the proposals. The planning officer and/or relevant consultees may contact you for additional details of climate change measures outlined within or omitted from the checklists and supporting statements. You are encouraged to complete the checklist as fully as possible, so that planning officers, consultees and others can quickly understand how the scheme has addressed climate change issues and where in the application documentation this is evidenced.

# | APPENDIX A

## CHECKLISTS

### CHECKLIST 1:

#### Householder applications/extensions and Applications for 1-2 new dwellings

This checklist is required for all HOUSEHOLDER and 1-2 NEW OR REPLACEMENT DWELLINGS ONLY planning applications.

The purpose of the checklist is to ensure that every householder planning application gives due consideration to sustainability and climate change measures that should be incorporated into the scheme.

This checklist sets out all of the potential measures which could be included in your scheme. Please review all features present in the 'measures' column and tick the appropriate Yes, No or N/A as applicable, having consideration to:

- measures included above and below ground, including matters such as utilities;
- sustainable transport measures which could be incorporated as part of a home improvement project (e.g. bicycle storage, EV charging);
- matters relating to materials and building works.

Please submit the completed checklist with your planning application.

# CHECKLIST 1:

## Householder applications/extensions and Applications for 1-2 new dwellings

Adopted Core Strategy Policy	Policy promotes and/or requires:	Measures	Considered in the proposed development scheme?			If YES, identify where in the planning application this information can be found e.g. Plans, supporting reports If NO or N/A, please state reasons
			Yes	No	N/A	
<b>ENERGY</b>						
SP7: Climate change and transport	Inclusion of renewables, energy conservation	<p><b>HE1</b> Air / ground source heat pump installation</p> <p><b>HE2</b> Low-temperature heating (e.g. underfloor)</p> <p><b>HE3</b> Building insulation measures</p> <p><b>HE4</b> Consideration of building orientation, ventilation, windows and shading for both solar gain and cooling</p>				
CC1: Renewable energy	<p>Where development exceeds 100m<sup>2</sup>* (e.g. for a complete new home) it is required to:</p> <ul style="list-style-type: none"> <li>Optimise design, layout and orientation to minimise energy usage.</li> <li>At least 10% of the development energy's demand from on-site renewables (unless viability indicates otherwise)</li> </ul>	<p><b>HE5</b> Double / triple glazing</p> <p><b>HE6</b> Installation of photovoltaic (solar) panels / tiles / 10% of energy demand from on-site renewables e.g. solar panels</p> <p><b>HE7</b> Install smart meter / energy monitoring</p> <p><b>HE9</b> Installation of new, energy efficient appliances e.g. boilers, lighting</p> <p><b>HE</b> Other, please state</p>				

**CHECKLIST 1:**

Householder applications/extensions and Applications for 1-2 new dwellings

Adopted Core Strategy Policy	Policy promotes and/or requires:	Measures	Considered in the proposed development scheme?			If YES, identify where in the planning application this information can be found e.g. Plans, supporting reports If NO or N/A, please state reasons
			Yes	No	N/A	
<b>TRANSPORT</b>						
SP7: Climate change and transport	Development reduces the need to travel and encourages alternatives to car use.	<b>HT1</b> Accessible and secure bicycle storage <b>HT2</b> Electric vehicle charging provision <b>HT3</b> Space for home working to reduce commuting needs <b>HT4</b> Dropped kerbs to retail level footway / cycleway <b>HT</b> Other, please state				
CC2: Sustainable travel	Accessibility by non-car means					
CC3: Parking provision	Secure cycle parking provision					
EN3: Air quality	Support non-car travel					

# CHECKLIST 1:

## Householder applications/extensions and Applications for 1-2 new dwellings

Adopted Core Strategy Policy	Policy promotes and/or requires:	Measures	Considered in the proposed development scheme?			If YES, identify where in the planning application this information can be found e.g. Plans, supporting reports If NO or N/A, please state reasons
			Yes	No	N/A	
<b>CONSTRUCTION &amp; WASTE</b>						
EN1: Design of new development	Incorporate provision for the storage of waste and recyclable materials	<p><b>HC1</b> Low-carbon and/or recyclable construction materials</p> <p><b>HC2</b> Local construction materials</p> <p><b>HC3</b> Designed to be able to be adapted for needs in later life (e.g. ageing)</p> <p><b>HC4</b> Internal recycling storage with sufficient space</p> <p><b>HC5</b> External bin store with space for recycling and easy access for collection</p> <p><b>HC6</b> External space for composting</p> <p><b>HC</b> Other, please state</p>				
CC1: Renewable energy, energy conservation and sustainable construction	Use of sustainable construction materials.					

**CHECKLIST 1:**

## Householder applications/extensions and Applications for 1-2 new dwellings

Adopted Core Strategy Policy	Policy promotes and/or requires:	Measures	Considered in the proposed development scheme?			If YES, identify where in the planning application this information can be found e.g. Plans, supporting reports If NO or N/A, please state reasons
			Yes	No	N/A	
<b>GREEN INFRASTRUCTURE</b>						
EN8: Protecting and improving the landscape & biodiversity	New development contributes to an improvement in landscape & biodiversity and avoids harm to features of significance in the landscape/nature/  Development refused where there is a significant landscape impact or impact upon nature conservation	<b>HG1</b> Bird boxes <b>HG2</b> Bat boxes <b>HG3</b> Bee bricks <b>HG4</b> Hedgehog holes/highways through fences <b>HG5</b> New and / or retained native species hedges and planting <b>HG7</b> Green roof / walls <b>HG</b> Other, please state				
SP6: Maintaining and improving the environment	Design and layout respects the local environment including the protection of sites of nature conservation value and landscape value.  Improvement to poor quality environments within the urban area and Green Belt.					

# CHECKLIST 1:

## Householder applications/extensions and Applications for 1-2 new dwellings

Adopted Core Strategy Policy	Policy promotes and/or requires:	Measures	Considered in the proposed development scheme?			If YES, identify where in the planning application this information can be found e.g. Plans, supporting reports If NO or N/A, please state reasons
			Yes	No	N/A	
<b>WATER</b>						
SP7: Climate change and transport	<p>Promoting the efficient use and conservation of water resources</p> <p>Promoting measures to reduce flooding and risks from flooding</p>	<p><b>HW1</b> Rainwater harvesting systems e.g. water butts</p> <p><b>HW2</b> Separate grey water and sewerage systems</p> <p><b>HW3</b> Water use limits and smart metering</p> <p><b>HW4</b> Retain / expand permeable outdoor areas e.g. lawn, flowerbeds, permeable paving where applicable</p> <p><b>HW5</b> Drought tolerant plants used, where applicable</p> <p><b>HW6</b> Water-efficient appliances and fixings e.g. washing machine, taps</p> <p><b>HW7</b> Installation of leak detection system</p> <p><b>HW</b> Other, please state</p>				

**CHECKLIST 1:**

## Householder applications/extensions and Applications for 1-2 new dwellings

Adopted Core Strategy Policy	Policy promotes and/or requires:	Measures	Considered in the proposed development scheme?			If YES, identify where in the planning application this information can be found e.g. Plans, supporting reports If NO or N/A, please state reasons
			Yes	No	N/A	
<b>SPACE &amp; PLACE DESIGN</b>						
EN1: Design of new development	High standard of design for development including due regard to scale, proportions, building lines, materials and impacts on neighbouring property e.g. daylight impacts	<p><b>HD1</b> Shaded outdoor areas and amenity space through building overhangs, trees / vegetation or other structures.</p> <p><b>HD2</b> Materials for natural cooling e.g. stone, natural materials, reflective roofs.</p> <p><b>HD</b> Other, please state</p>				
SP6: Maintaining and improving the environment	<p>Ensure the design and layout incorporates principles of sustainable development, respects the environment of the area.</p> <p>Protect and enhance areas of existing environmental character and nature conservation</p> <p>Promote improvement of poor-quality environments.</p>					

\***Core Strategy Policy CC1** (Renewable Energy) requires for specific measures to be achieved where your scheme / extension will create more than 100m<sup>2</sup> of floorspace or the creation of 1+ new dwellings. Please provide additional information where this is required.



# APPENDIX A

## CHECKLISTS

### CHECKLIST 2:

#### Minor planning applications (3-10 dwellings, <1000m<sup>2</sup>, <1ha)

This checklist is required for all MINOR (3-10 DWELLINGS OR <1000m<sup>2</sup> FLOORSPACE / 1HA SITE SIZE) planning applications.

The purpose of the checklist is to ensure that every householder planning application gives due consideration to sustainability and climate change measures that should be incorporated into the scheme.

This checklist sets out all of the potential measures which could be included in your scheme. Please review all features present in the 'measures' column and tick the appropriate Yes, No or N/A as applicable, having consideration to:

- measures included above and below ground, including matters such as utilities;
- sustainable transport measures which could be incorporated as part of a home improvement project (e.g. bicycle storage, EV charging);
- matters relating to materials and building works.

Please submit the completed checklist with your planning application.

**CHECKLIST 2:**

Minor planning applications (3-10 dwellings, <1000m2, <1ha)

Adopted Core Strategy Policy	Policy promotes and/or requires:	Measures	Considered in the proposed development scheme?			If YES, identify where in the planning application this information can be found e.g. Plans, supporting reports  If NO or N/A, please state reasons
			Yes	No	N/A	
<b>ENERGY</b>						
SP7: Climate change and transport	Inclusion of renewables, energy conservation	<b>HE1</b> Air / ground source heat pump installation <b>HE2</b> Low-temperature heating (e.g. underfloor)				
CC1: Renewable energy	Development of more than 1 dwelling, and development exceeding 100m2 it is required to: <ul style="list-style-type: none"> <li>• Optimise design, layout and orientation to minimise energy usage.</li> <li>• At least 10% of the development energy's demand from on-site renewables (unless viability indicates otherwise)</li> </ul> Encouraging renewable energy equipment installation, sustainable construction materials, encouraging developments to attain high energy efficiency rates e.g. BREEAM 'very good'.	<b>HE3</b> Building insulation measures <b>HE4</b> Consideration of building orientation, ventilation, windows and shading for both solar gain and cooling <b>HE5</b> Double / triple glazing <b>HE6</b> Installation of photovoltaic (solar) panels / tiles / 10% of energy demand from on-site renewables e.g. solar panels <b>HE7</b> Install smart meter / energy monitoring <b>HE9</b> Installation of new, energy efficient appliances e.g. boilers, lighting <b>SE1</b> Connections to existing district heat networks <b>SE3</b> Energy efficient/LED street lighting <b>SE4</b> Central heat sources (e.g. ground/air source heat pumps serving flat complex) <b>SE5</b> Dual aspect buildings maximising natural light <b>SE7</b> Design of buildings to allow for passive ventilation <b>SE9</b> Shading provided to prevent overheating <b>SE12</b> Demand responsive building systems <b>E</b> Other, please state				

**CHECKLIST 2:**

Minor planning applications (3-10 dwellings, <1000m<sup>2</sup>, <1ha)

Adopted Core Strategy Policy	Policy promotes and/or requires:	Measures	Considered in the proposed development scheme?			If YES, identify where in the planning application this information can be found e.g. Plans, supporting reports  If NO or N/A, please state reasons
			Yes	No	N/A	
<b>TRANSPORT</b>						
SP7: Climate change and transport	Development reduces the need to travel and encourages alternatives to car use.	<b>HT1</b> Accessible and secure bicycle storage <b>HT2</b> Electric vehicle charging provision <b>HT3</b> Space for home working to reduce commuting needs <b>HT4</b> Dropped kerbs to retail level footway / cycleway				
CC2: Sustainable travel	Accessibility by non-car means	<b>ST1</b> Permeable developments to allow walking and cycling throughout <b>ST3</b> Segregated lane provision (car/bike/ pedestrian) on roads <b>ST7</b> Shower/change facilities for employees in commercial developments				
CC3: Parking provision	Secure cycle parking provision	<b>T</b> Other, please state				
EN3: Air quality	Support non-car travel					

# CHECKLIST 2:

Minor planning applications (3-10 dwellings, <1000m<sup>2</sup>, <1ha)

Adopted Core Strategy Policy	Policy promotes and/or requires:	Measures	Considered in the proposed development scheme?			If YES, identify where in the planning application this information can be found e.g. Plans, supporting reports  If NO or N/A, please state reasons
			Yes	No	N/A	
<b>CONSTRUCTION &amp; WASTE</b>						
EN1: Design of new development	Incorporate provision for the storage of waste and recyclable materials	<p><b>HC1</b> Low-carbon and/or recyclable construction materials</p> <p><b>HC2</b> Local construction materials</p>				
CC1: Renewable energy, energy conservation and sustainable construction	Use of sustainable construction materials.	<p><b>HC3</b> Designed to be able to be adapted for needs in later life (e.g. ageing)</p> <p><b>HC4</b> Internal recycling storage with sufficient space</p> <p><b>HC5</b> External bin store with space for recycling and easy access for collection</p> <p><b>HC6</b> External space for composting</p> <p><b>SC1</b> Demolition to prioritise re-use of materials</p> <p><b>SC2</b> Use of long-lasting materials especially for public realm/facilities e.g. boundary treatments</p> <p><b>SC3</b> Shared utility channels</p> <p><b>SC4</b> Consideration of future repurposing or use of buildings allowing for adaptability e.g. generous ground floor ceiling heights</p> <p><b>SC5</b> Separate facilities for Waste Recycling – enough internal space, convenient access for collection</p> <p><b>SC10</b> Design for future commercial adaptability without demolition</p> <p><b>C</b> Other, please state</p>				

**CHECKLIST 2:**

Minor planning applications (3-10 dwellings, <1000m<sup>2</sup>, <1ha)

Adopted Core Strategy Policy	Policy promotes and/or requires:	Measures	Considered in the proposed development scheme?			If YES, identify where in the planning application this information can be found e.g. Plans, supporting reports  If NO or N/A, please state reasons
			Yes	No	N/A	
<b>GREEN INFRASTRUCTURE</b>						
EN8: Protecting and improving the landscape & biodiversity	New development contributes to an improvement in landscape & biodiversity and avoids harm to features of significance in the landscape/nature/  Development refused where there is a significant landscape impact or impact upon nature conservation	<b>HG1</b> Bird boxes <b>HG2</b> Bat boxes <b>HG3</b> Bee bricks <b>HG4</b> Hedgehog holes/highways through fences <b>HG5</b> New and / or retained native species hedges and planting <b>HG7</b> Green roof / walls <b>HG</b> Other, please state <b>SG1</b> Street trees and planting in public areas including native plants <b>G</b> Other, please state				
SP6: Maintaining and improving the environment	Design and layout respects the local environment including the protection of sites of nature conservation value and landscape value.  Improvement to poor quality environments within the urban area and Green Belt.					

## CHECKLIST 2:

Minor planning applications (3-10 dwellings, <1000m<sup>2</sup>, <1ha)

Adopted Core Strategy Policy	Policy promotes and/or requires:	Measures	Considered in the proposed development scheme?			If YES, identify where in the planning application this information can be found e.g. Plans, supporting reports  If NO or N/A, please state reasons
			Yes	No	N/A	
<b>WATER</b>						
SP7: Climate change and transport	<p>Promoting the efficient use and conservation of water resources</p> <p>Promoting measures to reduce flooding and risks from flooding</p>	<p><b>HW1</b> Rainwater harvesting systems e.g. water butts</p> <p><b>HW2</b> Separate grey water and sewerage systems</p> <p><b>HW3</b> Water use limits and smart metering</p> <p><b>HW4</b> Retain / expand permeable outdoor areas e.g. lawn, flowerbeds, permeable paving where applicable</p> <p><b>HW5</b> Drought tolerant plants used, where applicable</p> <p><b>HW6</b> Water-efficient appliances and fixings e.g. washing machine, taps</p> <p><b>HW7</b> Installation of leak detection system</p> <p><b>SW1</b> Use of Sustainable Urban Drainage Systems in public areas, integrated with planting</p> <p><b>W</b> Other, please state</p>				

**CHECKLIST 2:**

Minor planning applications (3-10 dwellings, <1000m<sup>2</sup>, <1ha)

Adopted Core Strategy Policy	Policy promotes and/or requires:	Measures	Considered in the proposed development scheme?			If YES, identify where in the planning application this information can be found e.g. Plans, supporting reports  If NO or N/A, please state reasons
			Yes	No	N/A	
<b>SPACE &amp; PLACE DESIGN</b>						
EN1: Design of new development	High standard of design for development including due regard to scale, proportions, building lines, materials and impacts on neighbouring property e.g. daylight impacts	<p><b>HD1</b> Shaded outdoor areas and amenity space through building overhangs, trees / vegetation or other structures.</p> <p><b>HD2</b> Materials for natural cooling e.g. stone, natural materials, reflective roofs.</p> <p><b>SD1</b> Use of planting, trees and water to cool spaces through evaporation in hotter weather</p> <p><b>SD2</b> Spaces with a comfortable micro-climate under anticipated climate change scenarios, considering solar heating, wind and wind patterns from surrounding buildings and shading, to ensure spaces can be used throughout the year</p>				
SP6: Maintaining and improving the environment	<p>Ensure the design and layout incorporates principles of sustainable development, respects the environment of the area.</p> <p>Protect and enhance areas of existing environmental character and nature conservation</p> <p>Promote improvement of poor-quality environments.</p>	<p><b>SD3</b> Use of appropriate materials and green infrastructure to reduce local heat island/ microclimate effects</p> <p><b>SD4</b> Provide shade through arcades, overhangs, balconies, landscape features, trees and building massing</p> <p><b>SD5</b> Shaded outdoor amenity areas for commercial buildings</p> <p><b>MiD</b> Other, please state</p>				



# APPENDIX A

## CHECKLISTS

### CHECKLIST 3:

#### Major planning applications (>10 dwellings or >1000m<sup>2</sup> floorspace)

This checklist is required for all MAJOR planning applications. These are classed as developments involving more than 10 dwellings, or the creation of more than 1000m<sup>2</sup> floorspace, or sites of more than 1 hectare in size.

The purpose of this checklist/form is to ensure that all major planning applications give due consideration to sustainability and climate change measures that should be incorporated into the scheme wherever possible. During early design stages, thought should be given to achieving high levels of energy efficiency and how the design will be resilient to changes in the climate.

This checklist sets out Spelthorne Borough Council's policies and the principles and measures which could be applied to comply with them. Please review all features present in the scheme design in the 'measures' column and tick the appropriate Yes, No or N/A as applicable, providing a justification and indication of where in the supporting documents this is evidenced, in the final column. Technical documents submitted with the planning application which may provide additional details relating to sustainability and climate change measures could include, but are not limited to, the following:

- Energy Statement and/or Sustainability Statement
- Design & Access Statement
- Landscape Design Statement / Green Infrastructure Strategy
- Utilities Statement
- Drainage Strategy
- Travel Plan
- Environmental Statement (climate change chapter), where required
- Construction and Waste Management Plan

Please submit the completed checklist with your planning application.





### CHECKLIST 3:

### Major planning applications (>10 dwellings or >1000m2 floorspace)

Adopted Core Strategy Policy	Policy promotes and/or requires:	Principles outlined in the SPD Core Themes	<p><b>How has this been considered in the planning application?</b></p> <p><i>Where a principle has not been considered, please provide reasoning / justification here.</i></p> <p><i>The detail provided for specific principles will vary between outline and full planning / reserved matters applications, but in all cases the incorporation of measures should be examined during the early stages of the design process and information provided within the planning application submission at the outset.</i></p>
<b>CONSTRUCTION &amp; WASTE</b>			
EN1: Design of new development	Incorporate provision for the storage of waste and recyclable materials	<p>Assessment of whole life carbon as part of design</p> <p>Following the construction hierarchy by:</p> <ul style="list-style-type: none"> <li>a) Using less, through reuse of buildings, avoiding unnecessary construction or building efficiently</li> <li>b) Using low carbon or recycled materials</li> <li>c) Offsetting of residual embodied carbon emissions</li> </ul> <p>Choosing appropriate materials for:</p> <ul style="list-style-type: none"> <li>a) Hot weather events so as to mitigate overheating</li> <li>b) Permeable materials for public realm to absorb surface water</li> </ul>	<p>Have you considered this? <b>Yes / No / N/A</b></p> <p>Where in the planning application has this been outlined?</p> <p>.....</p>
CC1: Renewable energy, energy conservation and sustainable construction	Use of sustainable construction materials.	<ul style="list-style-type: none"> <li>b) Construction waste management plans which recycle and retain materials on site, where possible</li> </ul> <p>Other, please state.</p>	<p>Other provision:</p> <p>.....</p>











## **Climate Change SPD Statutory Consultation Strategy**

### **Introduction**

The statutory consultation for the Climate Change Supplementary Planning Document (SPD) will be undertaken in accordance with Spelthorne Borough Council's Statement of Community Involvement (SCI) and the Town and Country Planning (Local Planning) (England) Regulations 2012 which set out the requirements for public participation in the preparation of SPDs. This covers how and when the Council intends to involve people, businesses and organisations in the planning process.

Ahead of, and during, the statutory consultation period, the Council will use a range of communication methods to ensure that residents, stakeholders, community organisations, businesses and statutory consultees are notified of the consultation and encouraged to provide feedback on the draft SPD.

### **Overview**

**Proposed statutory consultation:** starting on the 8 May 2026 (8/10/26)

**Duration:** 4 weeks, as required by Regulation 12(b)

**Consultation platform:** Commonplace

**Document availability:**

- Available to view online on the Strategic Planning Commonplace Engagement Hub
- Signposted on the Council website
- Hardcopies will be available in public libraries and at the Council Offices during office hours.

**Promotion of the statutory consultation will take the following forms:**

To ensure wide awareness and maximise participation, consultation promotion will include:

- **Promotion on SBC website**
  - Homepage
  - News items/ e-news
  - Press release
- **Promotion on Commonplace**
  - Regular news stories before and during the consultation
  - A step-by-step guide news story to guide people through how to respond to the consultation
- **Promotion on SBC social media steams**
  - Social Media Posts (Instagram, Facebook, X, LinkedIn etc.)
    - Reminder posts during and at the end of the consultation to highlight consultation closing soon
  - Social Media Stories (Instagram, Facebook)
    - Stories along with posts
- **Promotions at key location around Borough**
  - Posters

- Borough-wide key locations includes noticeboards across the Borough, council offices, libraries, community centres and others
- **Direct notifications (Regulation 12 statutory consultees)**
  - Emails to Residents' Associations
    - Emails during consultation with a call to action and salient points covered
  - Emails to Councillors
    - Emails before and during with a call to action and salient points covered
  - Emails to community groups and other statutory consultees
- **Promotion to staff**
  - Spelnet news
  - Page linked to the consultation on the Strategic Planning Hub on Spelnet
- **Further promotions to Members**
  - Member Briefing Note
- **Other promotions**
  - Email footers on Council emails from Planning Department



### 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	25/1/2026
Commissioner engagement (if report focused on issues of concern to Commissioners such as Finance, Assets etc)	yes	25/1/2026
Relevant Group Head review	yes	25/1/2026
MAT+ review (to have been circulated <b>at least 5 working days before Stage 2</b> )	Yes	25/1/2026
This item is on the Forward Plan for the relevant committee	yes	25/1/2026
	Reviewed by	
Finance comments (circulate to Finance)	AS	25/1/2026
Risk comments (circulate to Lee O'Neil)	LO	25/1/2026
Legal comments (circulate to Legal team)	LH	25/02/2026
HR comments (if applicable)	n/a	25/1/2026

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 <b>5 working days before MAT</b>	L Heron	25/02/2025
S151 Officer commentary – at least <b>5 working days before MAT</b>	TC	26/02/2026
Confirm final report cleared by MAT		



# Environment and Sustainability

Thursday 19 March

<b>Title</b>	<i>Spelthorne Recycling Bring Sites</i>
<b>Purpose of the report</b>	To make a decision
<b>Report Author</b>	<i>Jackie Taylor Group Head Neighbourhood Services</i>
<b>Ward(s) Affected</b>	All Wards
<b>Exempt</b>	No
<b>Exemption Reason</b>	Not applicable
<b>Corporate Priority</b>	Community Environment Services
<b>Recommendations</b>	<p><b>Committee is asked to:</b>  <b>Authorise the Group Head Neighbourhood Services to close the following bring sites located around the borough.</b></p> <ul style="list-style-type: none"> <li>• <i>Hadfield Road, Stanwell</i></li> <li>• <i>White House Depot, Ashford</i></li> <li>• <i>Woodlands Parade, Ashford</i></li> <li>• <i>High Street, Shepperton</i></li> </ul>
<b>Reason for Recommendation</b>	The recommendation to close these "bring sites" (public recycling bank) is due to illegal dumping, and/or fly-tipping. The sites listed within this report with a recommendation of closure are due to the cost and effort of clearing illegally dumped waste outweighing the benefits of providing the service.

## 1. Executive summary of the report

What is the situation	Why we want to do something
<ul style="list-style-type: none"> <li>• Spelthorne has eighteen bring sites located around the borough, these sites are misused daily and the time spent clearing and removing the illegal dumping of waste far outweighs the benefits of providing the service.</li> </ul>	<ul style="list-style-type: none"> <li>• The illegal dumping of waste at these bring sites creates a vermin issue as well as excessive amounts of time trying to keep them clean and presentable.</li> </ul>
This is what we want to do about it	These are the next steps
<ul style="list-style-type: none"> <li>• Close the bring sites at the locations listed.</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure that local residents have provision to dispose of their recycling waste. Remove</li> </ul>

	signage and bins from each of the sites and monitor/enforce any subsequent fly tipping.
--	-----------------------------------------------------------------------------------------

## 2. Key issues

- 2.1 Everyone has a **legal duty of care** to ensure their waste is disposed of correctly and legally and not allowing waste to be dumped illegally either by a carrier or the person creating the waste.
- 2.2 **Duty of Care:** Both individuals and businesses have a "duty of care" to ensure their waste is disposed of legally. Using a bring site for prohibited items is a criminal offense under the [Environmental Protection Act 1990](#).
- 2.3 In the UK, "bring sites" (local recycling points often found in car parks) are increasingly being removed by local councils primarily due to persistent illegal dumping and fly-tipping.
- 2.3 **Fly-tipping and Dumping:** These sites frequently attract non-recyclable household waste, commercial waste, and bulky items that should be taken to the Household Waste & Recycling Centre (HWRC) in Shepperton, or disposed of by way of an authorised waste disposal contractor.
- **Contamination:** When non-recyclable materials are dumped into recycling bins, the entire load often becomes contaminated and must be sent to landfill or incineration instead of being recycled.
  - **Operational Costs:** The Council spends a significant amount of time enforcing and clearing dumped rubbish and cleaning sites, which often exceeds the benefit of the recyclables collected. Clearance of these sites is incorporated into other daily tasks and it is not possible to provide an estimated cost of clearance.
  - **New Legislation:** The [Environment Act 2021](#) and updated "Simpler Recycling" rules (effective 2025) require more consistent kerbside collections, reducing the necessity for communal bring sites.
- 2.4 Bring sites were established over twenty years ago before alternate weekly kerbside collections of rubbish and recyclables were introduced to residential properties. Spelthorne made this move in 2007 and has since been moving those properties that could not recycle kerbside at that time to alternate weekly collection and so providing them with a kerbside recycling and food waste service.
- 2.5 Since 2007 when residents waste disposal was limited to 240l bins we have seen an increase in the amount and frequencies of fly tips at these locations. This generates complaints from residents and councillors due to the unsightly nature of piles of rubbish and fly tipping in what should be a clean area of just properly disposed of and contained recyclables.
- 2.6 Ten years ago a decision was made to close some of the worst sites at that time, those being on Tesco Sunbury and Tesco Stanwell, both sites generated large volumes of fly tipped waste, both commercial and residential and little or no valuable recycling. Other bring sites also closed over several years include Woodthorpe Road Ashford, Horton Road Stanwell Moor, Clare Road shops and Spelthorne Leisure Centre.

- 2.7 The Government's Resources and Waste Strategy (GRAWS) requires local authorities to provide more consistent kerbside collections which have reduced the need for bring sites to be operating.
- 2.8 Despite the Council introducing more options for recycling at the kerbside such as those listed below, we continue to see a rising number of fly tips and contaminated bins at the bring sites.
- Alternate weekly kerbside collection of waste
  - Alternate weekly kerbside collection of recyclables
  - Weekly kerbside collection of food waste
  - Weekly kerbside collection of small electricals and textiles
- 2.9 More often than not, due to the dumping of waste and contamination of bins, most of the waste left at bring sites has to be sent for disposal as residual waste, rather than being recycled as originally intended.
- 2.10 Over many years, we have participated in campaigns through the Tidy Britain Campaign, as well as using our own social media channels, to educate both residents and non-residents about the potential fines and costs associated with fly-tipping if caught.
- 2.11 We have also been successful in securing grant funding to help identify and prosecute fly-tippers, not only at bring sites but also at other known fly-tipping hotspots.
- 2.12 Reporting fly-tipping is a statutory requirement for all local authorities. However it is not possible to accurately estimate how many fly-tipping incidents occur at bring sites, as most accumulations of waste are created by multiple unknown individuals over time.
- 2.13 Since the establishment of the Joint Enforcement Team (JET), officers have carefully monitored activities that result in fly-tipping and have issued numerous Fixed Penalty Notices (FPNs). However, this approach tends to deter only those individuals who receive a fine and does not prevent others from fly-tipping or contaminating bins.
- 2.14 **Appendix 1** demonstrates the extent of fly-tipping encountered at some bring sites over the past 12 months.
- 2.15 The Borough has a Community Recycling Centre (CRC) in Shepperton, which is a Surrey County Council (SCC) site. Surrey residents can use the facility to dispose of household waste, recyclables, and green waste. The site is open seven days a week throughout the year from 8am to 4pm, except on 25 and 26 December and 1 January, when it is closed.
- 2.16 The CRC accepts all materials that residents would normally be able to dispose of at a bring site, as well as additional waste types and larger quantities. It is well located in the centre of the borough with easy access.

2.17 This site provides a comprehensive waste disposal option for all residents and can be used once the bring sites are closed.

### 3. Options appraisal and proposal

#### 3.1 Option 1 (preferred)

Close these bring sites due to persistent fly-tipping and lack of appropriate use, with closures advertised on social media and clear signage installed to direct users to alternative waste disposal options. We are fully aware that removing such bring site may initially create some criticism and we accept that the removal can only take place alongside a convenient alternative and strong communication.

#### 3.2 Option 2

Take no action at these sites, which would continue to provide opportunities for fly-tippers to deposit both domestic and commercial waste. Due to the nature of fly-tipping, enforcement relies on identifying vehicles used to transport waste to the sites through DVLA records. Where individuals arrive on foot, it is not possible to identify the fly-tipper and therefore no enforcement action can be taken.

Although covert cameras are installed at some locations and prosecutions are pursued where offenders can be identified, most fly-tippers do not leave personal identifying information within the waste. In addition, vehicle registration plates are frequently obscured or out of view, making identification and enforcement difficult.

### 4. Risk implications

#### Risks Associated with Removing Public Bring Sites and Mitigation Measures

Risk	Description	Mitigation Measures
Increased fly-tipping	Residents may dump recyclables or waste illegally due to loss of convenient facilities	Strengthen enforcement and surveillance Provide clear information on alternative recycling options Issue Fixed Penalty Notices (FPNs) Rapid clean-up response <b>Actions built into existing officer's workloads</b>
Reduced recycling rates	Convenience is a key driver of recycling; removal may lower participation	Monitor recycling performance
Public dissatisfaction	Communities may perceive removal as a reduction in service	Communicate reasons, benefits, and alternatives clearly Phase removal gradually rather than all at once

Increased contamination	Overloaded household bins may lead to incorrect sorting and contaminated bins	Increase recycling guidance and education Continue to use clear bin labelling and feedback systems
Short-term cost increases	Initial rise in enforcement or clean-up costs	The Joint Enforcement Team (JET) and Cleansing Team will absorb any additional operational time within their working day.

## 5. Financial implications

The removal of the bring sites will be delivered at no additional cost to the Council. All associated activity, including communications, signage, and site management, will be fully contained within existing Neighbourhood Services Waste & Cleansing budgets, with no requirement for supplementary funding or budget growth.

- 5.1 Closing these sites will not generate any direct, cashable savings, as the emptying and clearance work is already undertaken by waste and cleansing operatives as part of their existing roles. However, by closing the sites, staff who currently carry out their daily clearance will be able to redirect their time and focus toward other borough cleaning priorities.

## 6. Legal comments

- 6.1 The Council has no specific statutory duty to carry out a consultation in relation to the proposed closure of the identified bring sites.
- 6.2 Broader obligations under the Public Sector Equality Duty may require an impact assessment and a consultation where the proposal disproportionately affects certain groups.
- 6.3 Contracts associated with the bring sites (if any) may require change notices to be issued and / or variation; Legal Services must be consulted
- 6.4 Waste strategy and management, including recycling, is within the remit of Environment and Sustainability Committee (part 3(b) of the Constitution).

## Corporate implications

### 7. S151 Officer comments

The S151 Officer confirms that all financial implications have been taken into account and that the recommendations are fully funded from within the current and draft 2026/2027 budget.

### 8. Monitoring Officer comments

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

### 9. Procurement comments

The cost of the signage will be met from within existing budgets and is not expected to cost more than £2k.

### 10. Equality and Diversity

- 10.1 The removal of public recycling bring sites may disproportionately affect older and disabled residents, particularly those with limited mobility or without private transport.
- 10.2 These impacts are mitigated through the Council's comprehensive kerbside recycling service, including assisted collections for eligible households, and through clear, regular communications.
- 10.3 Phased implementation, removing one site at a time, will allow residents to adjust and enable the Council to monitor and manage each location. These measures ensure recycling remains accessible to all households.

## **11. Sustainability/Climate Change Implications**

While removing bring sites could slightly increase transport emissions for some residents, these impacts are mitigated by comprehensive kerbside recycling and assisted collections. Overall, the shift can improve operational efficiency and resource management if carefully implemented, but ongoing monitoring is needed to ensure recycling participation is not impacted.

## **12. Other considerations**

### **12.1 Woodlands Parade Site**

At the Woodlands Parade site, residents of the flats above the shops have very limited space to store bins. As a result, this bring site currently provides a convenient facility for disposing of waste and recycling. It is also the site most affected by fly-tipping. The Council has engaged with the twelve affected households to ensure that once the bring site is removed they will have access to kerbside rubbish, recycling, and food waste collection services, equivalent to other residents in the borough.

- 12.2 The relocation of the bring site will create a need for these twelve households' waste to be collected more frequently than other properties. This increased collection will be managed by Neighbourhood Services within existing resources, with no additional cost implications.

## **13. Timetable for implementation**

It is proposed that the sites will be removed in the following order:-

1. Hadfield Road, Stanwell
2. White House Depot, Ashford
3. Woodlands Parade, Ashford
4. High Street, Shepperton

- 13.1 Subject to approval of this report, the first bring site closure is scheduled for mid-March, followed by the second site at the end of March. The second site is located directly outside the depot, which is expected to make its closure easier to manage. Special attention will be given to minimize fly-tipping during this process.

13.2 Following the first two closures, the plan is to close the third site in May and the fourth site in July, allowing adequate time to manage each location before proceeding to the next.

**14. Contact**

Jackie Taylor Group Head Neighbourhood Services

**Background papers: There are none.**

**Appendices:**

**Appending 1 examples of fly tipping at each of the four sites.**

Appendix 1





This page is intentionally left blank



### 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	02.02.26 06.03.26
Commissioner engagement (if report focused on issues of concern to Commissioners such as Finance, Assets etc)	YES	05.03.26
Relevant Group Head review	LH AB DA SM KS CH	06.02.26
MAT+ review (to have been circulated <b>at least 5 working days before Stage 2</b> )	YES	06.02.26
This item is on the Forward Plan for the relevant committee	YES	02.02.26
	Reviewed by	
Finance comments (circulate to Finance)	A. Bozhani	02.02.26
Risk comments (circulate to Lee O'Neil)	L. O'Neil	04.03.26
Legal comments (circulate to Legal team)	LH	17.02.26
HR comments (if applicable)		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.

#### Stage 2

##### Report checklist – responsibility of report owner.

ITEM	Completed by	Date
Monitoring Officer commentary – <b>at least 5 working days before MAT</b>	L. Heron	06.03.26
S151 Officer commentary – <b>at least 5 working days before MAT</b>	T. Collier	06.03.26
Confirm final report cleared by MAT	MAT	10.03.2026

# Environment and Sustainability Committee

Thursday 19 March 2026

<b>Title</b>	Public Consultation for Proposed Multi-Use Games Area (MUGA) at Memorial Gardens, Staines upon Thames
<b>Purpose of the report</b>	To make a decision
<b>Report Author</b>	<i>Jackie Taylor Group Head Neighbourhood Services</i>
<b>Ward(s) Affected</b>	All Wards
<b>Exempt</b>	No
<b>Exemption Reason</b>	Not applicable
<b>Corporate Priority</b>	Community Environment Services
<b>Recommendations</b>	<p><b>Committee is asked to:</b></p> <ol style="list-style-type: none"> <li>1. Authorise the Group Head Neighbourhood Services (GHNS) to commence a public consultation exercise for the proposed new Multi-Use Games Area (MUGA) to be built in Memorial Gardens, Staines-upon-Thames;</li> <li>2. Subject to the Group Head Neighbourhood Services (GHNS) and the Group Head Corporate Governance (GHCG), in consultation with the Chair and Vice-Chair of this Committee, reviewing the consultation responses and being satisfied that, on balance, the feedback indicates overall support for the proposal and that any issues raised can be appropriately addressed, authorise GHNS to: <ol style="list-style-type: none"> <li>a. Appoint appropriately qualified ecological specialists to undertake the necessary ecological appraisals and surveys required to support the planning application for the proposed installation of a new MUGA;</li> <li>b. Undertake a procurement exercise to establish availability of resource and the indicative cost of the works; and</li> <li>c. Submit a planning application for the construction and installation of a new recreation facility, including associated fencing, safety surfacing, and site preparation works at Memorial Gardens, Staines-upon-Thames.</li> </ol> </li> <li>3. GHNS to report back to the E&amp;S Committee with feedback from the consultation, procurement exercise, and planning meeting.</li> </ol>
<b>Reason for Recommendation</b>	Installing a Multi-Use Games Area (MUGA) within the park has the potential to reduce anti-social behaviour by providing a positive, structured environment for sport and recreation. The facility has the potential to bring diverse groups together and offer constructive opportunities for young people through supervised

	and informal activity. As this would be a new facility, the project is subject to several preliminary requirements. These include undertaking a public consultation, securing committee approval, and obtaining the necessary planning permission before any procurement or installation works can commence.
--	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

## 1. Executive summary of the report

What is the situation	Why we want to do something
<ul style="list-style-type: none"> <li>The garden is a well-used public space but currently has limited facilities aimed at older children and young people. This has contributed to concerns regarding a lack of structured recreational opportunities and the associated potential for anti-social behaviour within and around the park. Members have identified a need to improve provision for informal sport and physical activity to better meet community needs and promote positive use of the space.</li> <li>Several large new developments have taken place in Staines-upon-Thames (SUT), and this proposed outdoor facility will provide additional outdoor space for the residents of these new properties.</li> </ul>	<ul style="list-style-type: none"> <li>The proposal to install a Multi-Use Games Area (MUGA) has been put forward by members as a potential solution to address recreational provision gap. This report seeks the committee's approval to develop the proposal further in line with the recommendations.</li> </ul>
This is what we want to do about it	These are the next steps
<ul style="list-style-type: none"> <li>It is proposed to develop a Multi-Use Games Area (MUGA) to enhance recreational provision and support positive use of the garden.</li> </ul>	<ul style="list-style-type: none"> <li>Public consultation will be carried out.</li> <li>Subject to the results of the public consultation ecology, planning and procurement aspects will be progressed.</li> </ul>

## 2. Key issues

- 2.1 Located in Staines-upon-Thames, Memorial Gardens is a riverside green space and a key component of the Staines Conservation Area. Established in 1897, the gardens occupy a prominent position. Historically, the site served as the original home of the Staines War Memorial before its relocation to Market Square in 2002.
- 2.2 The gardens are undergoing a transition, and a different project is currently underway to install a new children's play facility on the site to enhance the area's family friendly utility. The Gardens remain a popular destination for

- leisure, offering river mooring, trees, flowerbeds, and a central location for local events and quiet reflection along the River Thames.
- 2.3 Memorial Gardens serves as a vital cornerstone for community health and wellbeing in Staines, functioning as a "blue green" therapeutic space that integrates physical activity with mental restoration, aligned with the current Spelthorne Health and Wellbeing Strategy. The Gardens help to provide a high-quality environment for "green prescribing," where the riverside setting helps reduce stress and combat social isolation.
- 2.4 The introduction of a new active play area facility on the former five swimmers sculpture site, which is a different project, further promotes health equity by providing free, accessible exercise opportunities for families. By linking the Thames Path to local residential hubs, the Gardens encourage active travel and daily movement, significantly contributing to the borough's long-term goals of preventing chronic illness and enhancing the overall quality of life for residents.
- 2.5 This report seeks Members' approval to commence a public consultation exercise for the proposed new Multi-Use Games Area (MUGA) to be built in Memorial Gardens SUT. Subject to favourable outcomes from the consultation and in the event the responses do not identify a substantial detrimental impact on local amenity, authorise this project to progress further as detailed in the recommendations.
- 2.6 The proposed MUGA would complement the new play area for younger children planned for the park, providing recreational opportunities for residents and visitors of all ages. The facility would support and promote the Council's Health and Wellbeing Strategy while ensuring a balanced range of play and activity provision within the park.
- 2.7 The proposal would be for the MUGA to be managed on a semi-informal basis, with access gates opened and closed in line with the borough's park gates. During opening hours, the facility would be available for open community use, supporting accessibility and remaining consistent with the wider garden management arrangements.
- 2.8 A multi-use games area, otherwise known as a MUGA, is a multipurpose facility designed to incorporate sports such as tennis, netball, basketball, football, and many other sports all into one area. It enables people of all ages to play all those sports at contrasting times, or at the same time on one facility.
- 2.9 The benefit of MUGA is that it is available in various surface types and therefore useable all year round without the need for natural grass surface damage and subsequently frequent repairs.
- 2.10 The proposed MUGA is intended to provide a positive and structured recreational facility that may help divert young people away from anti-social behaviour and encourage more constructive use of the garden. The parks team manage eight existing MUGAs around Spelthorne and it is considered that due to the age group of those using these facilities damage to the structure and features of the facility would be minimal. This is evident from the management of existing MUGAs in the borough.
- 2.11 **Location within the garden:**  
Careful consideration will be given to the siting of the proposed MUGA to

balance accessibility, ecology, safeguarding, noise levels, and the possible impact on nearby residents and other park users.

#### 2.12 **Community Consultation:**

A public consultation will be undertaken to gather feedback from residents, park users, local schools, and other stakeholders, including the Staines Business Improvement District and the organisers of the annual Staines-upon-Thames Day, which has been hosted in the Gardens for the past decade.

Relevant stakeholders and statutory consultees, such as Ward Members, the Environment Agency (where relevant), and the Emergency Services will be invited to provide views where appropriate.

The consultation will provide information on the proposed Multi-Use Games Area (MUGA), including its potential location, design, and operating arrangements, and will seek feedback to help inform the development of the proposal. The consultation process will ensure that feedback received can inform both the design of the proposal and the planning process, with the results used to support any planning application.

#### 2.13 **Planning and Regulatory Requirements:**

The installation of a new MUGA will require planning permission, along with compliance with relevant environmental, accessibility, and safeguarding standards. Further detail is provided within this report (**point 12 Other Considerations**).

#### 2.14 **Financial Implications and Funding:**

It is intended that capital costs for installation of the facility would be met by way of an application that has been submitted to the Strategic Community Infrastructure Levy (CIL) Board. The deadline for applications to Local CIL is 31 March 2026. Applications will then be presented to the decision-making group for consideration, with outcomes published in July of the same year.

Ongoing maintenance, and safety checks will be undertaken by the parks team without additional costs as the facility would be incorporated into the work of the existing Playground Inspection Officer.

#### 2.15 **Management and Maintenance:**

It is proposed that the facility would operate primarily on a semi-informal, open-access basis, with day-to-day use managed by users rather than through a formal programme of organised activities or events. It is intended to have a formal process of unlocking and locking the access gates into the area. This security measure will be incorporated into the current parks and open spaces daily locking and unlocking timetables. It should be noted that the intention is to install low level fencing around the MUGA, potentially this means that users may wish to gain access to the area by climbing over the low-level fencing outside of its intended hours of opening.

Responsibility for inspections and maintenance will be incorporated into the existing duties of the Playground Inspection Officer within the Parks Team. This will ensure the facility is subject to routine safety inspections, defect reporting, and appropriate maintenance in line with current operational standards. There is no intention to install CCTV specifically for this MUGA.

#### 2.16 **Ecology and Biodiversity**

Consideration will need to be given to the presence of protected species, existing habitats, mature trees, and green infrastructure within the park. An initial ecological appraisal will be required to identify any constraints, along with any necessary mitigation measures to minimise habitat loss, disturbance, and light or noise impacts as the proposed installation of this MUGA has the potential to impact local ecology and biodiversity.

The project will seek to avoid ecologically sensitive areas where possible and incorporate biodiversity enhancements into the design, such as sustainable drainage solutions, retention of existing vegetation, and opportunities for habitat creation or improvement, in line with relevant planning policy and biodiversity duty.

### **3. Options appraisal and proposal**

#### **Option 1 – Progress Development of a Semi-Informal MUGA (Preferred)**

Approve the recommendations as set out in this report. This will enable the initial phase of the project to be progressed with a view to ultimately securing the following:

- The installation of a MUGA on a suitable area within the Gardens.
- The facility would have restricted access during the existing park gates opening and closing times. During opening hours (Summer 07:30 to 20:30 and Winter 07:30 to 18:00) the MUGA would be managed informally by users with no charges or booking required. Routine inspections and maintenance will be incorporated into the Parks Team's existing responsibilities.
- The facility would provide recreational opportunities, encourage positive use, and help limit anti-social behaviour.
- In recognition of the Gardens' use for the annual Staines upon Thames Day, consideration will be given, when preparing the specification, to the possible provision of removable fencing on one side of the MUGA.
- This project is subject to Committee approval, public consultation, ecology surveys, planning permission, and funding in addition to the statements and assessments detailed in **point 5.1**.

#### **Option 2 – Do Nothing**

- The park remains unchanged, with no additional recreational provision for older children and young people.
- Anti-social behaviour and limited engagement opportunities that may already exist would continue.
- No financial or operational implications arise from this do-nothing option.

#### **Option 3 – Develop Managed/Organised MUGA**

- Install a MUGA with formal management, bookings, or organised events.
- Greater control over use but increased operational and staffing costs.
- This would create a higher administrative burden and need for ongoing supervision and programmed sessions.

**Proposal Option 1 – Semi-Informal MUGA** is recommended as it offers a strong balance between community benefit, cost-effectiveness, and ease of management, while meeting the need for accessible, structured recreational space. Consultation, ecological survey results and planning processes will inform the final location and design, and funding will be confirmed prior to the procurement of equipment, followed by installation.

#### 4. Risk implications

4.1 The proposed installation of a MUGA carries a range of potential risks that must be managed:

Potential Risk	Mitigation
Health and Safety, risk of injury during use.	This is no different to the situation with all recreation activities in the Borough and will be mitigated in the same way through design standards, signage, and routine inspections by the Playground Inspection Officer.
Proximity of MUGA to the River Thames may increase the risk of balls entering the river and children attempting to retrieve them	Design mitigation measures, such as increased fence height and full enclosure of the MUGA; ensure consultation highlights safety considerations; incorporate river proximity into planning and design approvals.
While the facility aims to reduce ASB, there is a risk of damage or misuse.	The introduction of structured opening and closing times, alongside regular inspections and ongoing community engagement, will support management of this risk. CCTV monitoring is not included in this proposal, and there is no intention to install lighting, which should naturally encourage appropriate daytime use and help to manage activity levels within the site.
Planning permission may be delayed or refused.	Early engagement with planning officers and adherence to policy and environmental standards will help to reduce this risk
Due to the project's complexity, an external provider will prepare the planning application and all supporting documents to ensure a balanced submission.	Early engagement with stakeholders and Planning department will help to mitigate these complexities.
Impact on habitats, protected species, or trees.	A tree survey has already been undertaken which does not identify any risks to trees within the proposed installation area, in addition to this ecological appraisals and design

	measures will minimise potential disruption.
CIL application.	The project depends on CIL funding. If this is not approved, no further exploratory works can proceed until a further report has been considered by committee.
Abortive costs, cost over runs, ongoing maintenance liabilities, or insufficient funding.	All initial costs will be carefully managed and kept to a minimum to limit exposure to abortive costs; accurate cost estimates, and contingency planning before procurement will help to avoid overspend on the CIL budget allocation (subject to the award being made).
Misuse of the facility.	Monitoring and reporting by officers, users, community engagement, and management arrangements will assist with mitigating any potential misuse.
Reputational risk.	Consultation with stakeholders and residents helps mitigate reputational risk by demonstrating transparency, showing the Council is listening, and identifying potential concerns early. It improves the quality and credibility of proposals, reduces the likelihood of public opposition or negative media coverage, and provides clear evidence that decisions have been made responsibly and with community input.

4.2 Risks will be managed through, consultation outcomes, routine inspections and adherence to council policies, with further reports to Committee if additional mitigation or resources are required.

## 5. Financial implications

5.1 As the site lies within a Conservation Area and an Area of High Archaeological Potential, the Council will be required to appoint a consultant to prepare both a Heritage Statement and an Archaeological Assessment, together with a flooding consultant to prepare a Flood Risk Assessment (FRA), as part of the planning approval process. It is anticipated that the costs associated with preparing these statements and assessments, and submitting a planning application, which requires an architect's design would be in the region of £27,000–£30,000.

5.2 The capital cost of installing a MUGA would depend on the final design, site preparation requirements, and any associated landscaping or ecological mitigation, and undertaking the procurement process. Funding for the project would need to be confirmed by the CIL task group before procurement and installation can proceed.

5.3 It is estimated that the project from start to finish is estimated to cost in the region of £500k which includes a contingency of £75k which may not be

required and will then remain in the general CIL fund. In readiness, a CIL application of £500k has been submitted by Neighbourhood Services for consideration by the CIL Board, if the CIL board approve the funding the announcement would be in July of the same year. This application can be withdrawn at any time.

5.4 Ongoing revenue implications are expected to be limited, as the facility would operate semi- informally and managed primarily by users. Routine inspections and maintenance will be incorporated into the existing responsibilities of the Playground Inspection Officer within the Parks Team, with minimal additional staffing costs anticipated.

5.5 It is anticipated that the ongoing revenue implications would not create additional budgetary pressure, as these activities will be incorporated into existing workloads. The additional works required to manage and maintain the facility include:

- Emptying one additional litter bin daily
- Daily removal of additional litter in and around the area
- Daily unlocking and locking of the MUGA
- Monthly scheduled maintenance inspections and general maintenance

Task	frequency	time	Daily cost
Litter bin	daily	365 x 0.15 minutes	£2.73 x 365 days
Litter pick	daily	365 x 0.15 minutes	£2.73 x 365 days
Unlocking Visual inspection	daily	365 x 0.30 minutes	£5.46 x 365 days
Locking	daily		£7.00 x 365 days
Monthly inspection	monthly	12 x 0.30 minutes	£10.77 x 12 days per year
<b>Costs per year</b>			<b>£6,670</b>

As the MUGA will be constructed to a robust standard, repair costs associated with other borough MUGAs have historically been minimal. These costs primarily relate to the occasional replacement of basketball nets and/or removal of graffiti. While the surface may degrade over time due to levels of use, resurfacing is not expected to be required for at least five years.

Potential vandalism costs cannot be quantified, as this remains an unknown factor; however, vandalism has not been a significant issue at other borough MUGAs to date.

5.6 Potential financial risks include cost overruns, unforeseen site preparation requirements, or increased maintenance needs. These will be mitigated through accurate cost estimation, contingency planning, and monitoring of the facility once operational.

<b>Item</b>	<b>Estimated Cost / Impact</b>	<b>Comments / Mitigation</b>
<b>Capital Cost of MUGA Installation</b>	To be determined (dependent on design, size, and site preparation)	Costs confirmed through procurement; include contingency for site works.
<b>Planning and Consultation</b>	Due to the project's complexity, an external provider will prepare the planning application and all supporting documents to ensure a balanced submission.	Early engagement with stakeholders and planning department will help to mitigate these complexities.
<b>Routine Inspections and Maintenance</b>	Absorbed within existing Parks Team duties.	Inspections undertaken by Playground Inspection Officer; minimal additional cost.
<b>Operational and Staffing Costs</b>	None anticipated initially.	Semi-Informal, open-access facility, locking and unlocking of the facility incorporated into the park's existing security schedules.
<b>Contingency and Risk Mitigation</b>	Recommended 10–15% of capital costs.	This covers unforeseen site preparation, surveys, planning applications and other associated or unforeseen costs and is included within the £500k CIL bid.
<b>Revenue and Income</b>	Funding for this entire project is expected to be met by a CIL application. MUGAs are built to the highest standards for durability, minimizing damage and resisting vandalism, to reduce any ongoing maintenance costs.	Facility is free for public use.

## **6. Legal comments**

- 6.1 Advice and assistance from the Legal Team should be obtained in the review of the legal title to the proposed new site to ascertain all and any covenants or restrictions to which the land might be subject.
- 6.2 All contracts relating to the proposed works must comply with the Council's Contract Standing Orders.
- 6.3 Legal Team will assist in the preparation and negotiation of contracts and other necessary documentation relating to this project.
- 6.4 In accordance with the Terms of Reference in part 3 section (b) of the Constitution, parks, open spaces, allotments and playgrounds are within the area of responsibility for the Environment and Sustainability Committee.

## **7. Corporate implications**

- 7.1 **S151 Officer comments.**

The S151 Officer confirms that all financial implications have been taken into account and provision for £500k has been built into the approved Capital Programme for 2026/2027 on the assumption that the funding is coming from CIL.

The ongoing revenue costs can be met from existing budgets, MUGA equipment and surfacing typically lasts between **8 and 20+ years** before needing to be replaced or resurfaced, heavily depending on the material, usage levels, and maintenance.

## **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 In accordance with the Council's Contract Standing Orders the Procurement Team must assist with this project and all appointments must be in accordance with the relevant legislation and regulations.

## **10. Equality and Diversity**

- 10.1 The proposed MUGA would be designed to be accessible and inclusive for all members of the community, in line with the Council's equality duties. Considerations will include:

- **Accessibility:** The facility would comply with relevant standards to ensure access for people with physical disabilities, including level surfacing, ramps, and inclusive equipment where appropriate.
- **Age Inclusivity:** The MUGA would cater primarily to older children and younger people, but its design will allow use by a broad range of age groups.
- **Gender and Cultural Inclusivity:** The open-access nature of the facility encourages use by all genders and cultural groups, promoting diversity and social cohesion.
- **Community Engagement:** Public consultation will seek the views of all groups to ensure the facility meets community needs.

The design, siting, and management arrangements would take equality considerations into account, and any adjustments required to address identified barriers will be incorporated before installation.

## **11. Sustainability/Climate Change Implications**

- 11.1 The installation of a MUGA presents opportunities to incorporate sustainable design and climate-conscious practices. Key considerations include:

- **Materials and Construction:** Wherever possible, materials with low environmental impact, durability, and recyclability would be used to reduce the carbon footprint of the facility.
- **Energy Use:** The proposed MUGA will operate without powered equipment, minimising ongoing energy consumption. It is not proposed to install any lighting in this facility.

- **Surface Water Management:** Sustainable drainage solutions (SuDS) would be considered to manage surface water runoff and reduce flood risk.
- **Biodiversity:** Design and siting would aim to protect existing habitats and may include enhancements such as tree planting or green buffers, supporting local wildlife.
- **Longevity and Maintenance:** The use of durable materials and routine maintenance would extend the life of the facility, reducing resource use and the need for frequent replacement.

11.2 Overall, the project aims to balance recreational provision with environmental responsibility, in line with the council's climate change and sustainability commitments.

## 12. Other considerations

12.1 Memorial Gardens sits within the Staines Conservation Area which is legally protected for its historic and architectural significance, with specific management rules to preserve views, open spaces, buildings, and the riverfront.

12.2 The Conservation Area Status would be considered at every stage of the project. Building of this MUGA within the garden would need to evidence:

- Protected views of the Thames and Market Square
- Preserve the open, landscaped character.
- Avoid damage to trees or historic features.
- Use appropriate materials.

12.3 The planning application will need to evidence that the MUGA preserves or enhances the Conservation Area, in line with Sections 69 and 72 of the 1990 Act and local policy EN6.

12.4 Sections 69 and 72 of the [Planning \(Listed Buildings and Conservation Areas\) Act 1990](#) mandate the designation and preservation of conservation areas, while local policy EN6 requires development to preserve or enhance the character of these areas. Section 69 compels councils to identify special areas, and Section 72 requires that special attention be paid to preserving or enhancing their character/appearance in planning decisions.

### 12.5 Preliminary Stakeholder Discussions

Preliminary discussions have taken place with Surrey Fire and Rescue and Surrey Police, both of whom have provided helpful early feedback regarding the proposed new play area within Memorial Gardens. The new play area is intended to replace the 'five swimmers' that have been relocated to a new housing development in SUT, and the Committee has already approved that project to progress. Based on these initial conversations, it is anticipated that both partners would welcome the opportunity to be consulted further should a proposal to construct a MUGA within the same park be developed.

Preliminary discussions have also taken place with the Staines-upon-Thames Business Improvement District (BID), who have confirmed their support for the proposed MUGA in Memorial Gardens.

## 12.6 Arboriculture Impact Assessment Summary

An Arboriculture Impact Assessment has been conducted for the proposed installation area (**see Appendix 1 for proposed site location**), with the key positive findings as follows:

- *All existing mature trees can be retained, and no tree works are required.*
- *There will be no encroachment into the Root Protection Areas (RPAs) of any protected trees because of the proposed development of the MUGA.*
- *Two individual trees and two groups of trees require protection of their RPAs during construction.*
- *Construction processes are highly unlikely to negatively affect the health of retained trees, provided all recommendations in the report are adhered to.*
- *The method statement focuses on measures to protect trees throughout construction.*

## 12.7 Environment Agency

Installing a MUGA on green belt land next to a river involves several complex environmental and planning considerations. The Environment Agency (EA) and local planning authorities will need to consider the potential impact on flood risk, ecology, and landscape. A detailed list of potential issues that might be raised and would then need to be addressed as part of the planning approval stage is listed at **Appendix 4**.

## 12.8 Anti-Social Behaviour matters to be addressed.

When considering the installation of a MUGA in a riverside garden, it is important to carefully plan for potential anti-social behaviour (ASB) risks and associated considerations. Thoughtful design and management can help address matters such as noise and disturbance, vandalism and graffiti, litter and environmental impact, user conflicts, unsupervised gatherings, water safety, and perceptions of safety, with the aim of ensuring that the space is welcoming and well-used for its intended purpose.

## 13. Timetable for implementation

Subject to Committee approval in March 2026, consultation with partners and public stakeholders will be undertaken. This will be followed by the finalisation of the design and the submission of a planning application. Subject to the absence of unforeseen factors or delays at any stage of the process, it is anticipated that contractors will be appointed in January, with construction and delivery scheduled for completion by the end of March 2027.

<b>Stage</b>	<b>Description</b>	<b>Committee</b>	<b>Indicative Timescale</b>
Committee Approval	Approval to proceed	E&S	19 March 2026
Stakeholder Consultation	Consultation with partner stakeholders March-June		March – June 2026

	Wider Public consultation May-June		
Consultation and Stakeholder Response Review	Review and consideration of consultation responses		June-July 2026
Procurement exercise	Undertake procurement exercise to establish costs		August 2026
Design, Development and Planning	Design, development and submission of planning application (subject to consultation feedback)		July-October 2026
Planning Committee	Consideration of planning application and documents	Planning	November 2026
Report	GHNS to report outcome of consultation, procurement exercise and planning to E&S committee	E&S	Jan 2027

#### 14. Contact

*Jackie Taylor Group Head Neighbourhood Services 01784 446418*

**Background papers: There are none.**

**Appendices:**

**Appendix 1 Proposed site plan and images of Memorial Gardens SUT**

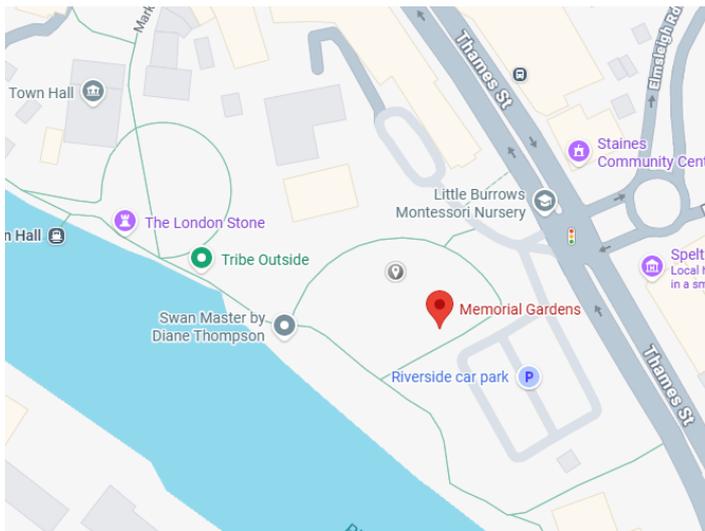
**Appendix 2 Visual of the proposed area of the MUGA in Memorial Gardens SUT.**

**Appendix 3 Map of Staines Conservation Area and Dedicated Bridleway within Memorial Gardens SUT**

**Appendix 4 Flood risk issues to be addressed and EA flood risk map.**

# Appendix 1

## Proposed site location for the MUGA in Memorial Gardens SUT



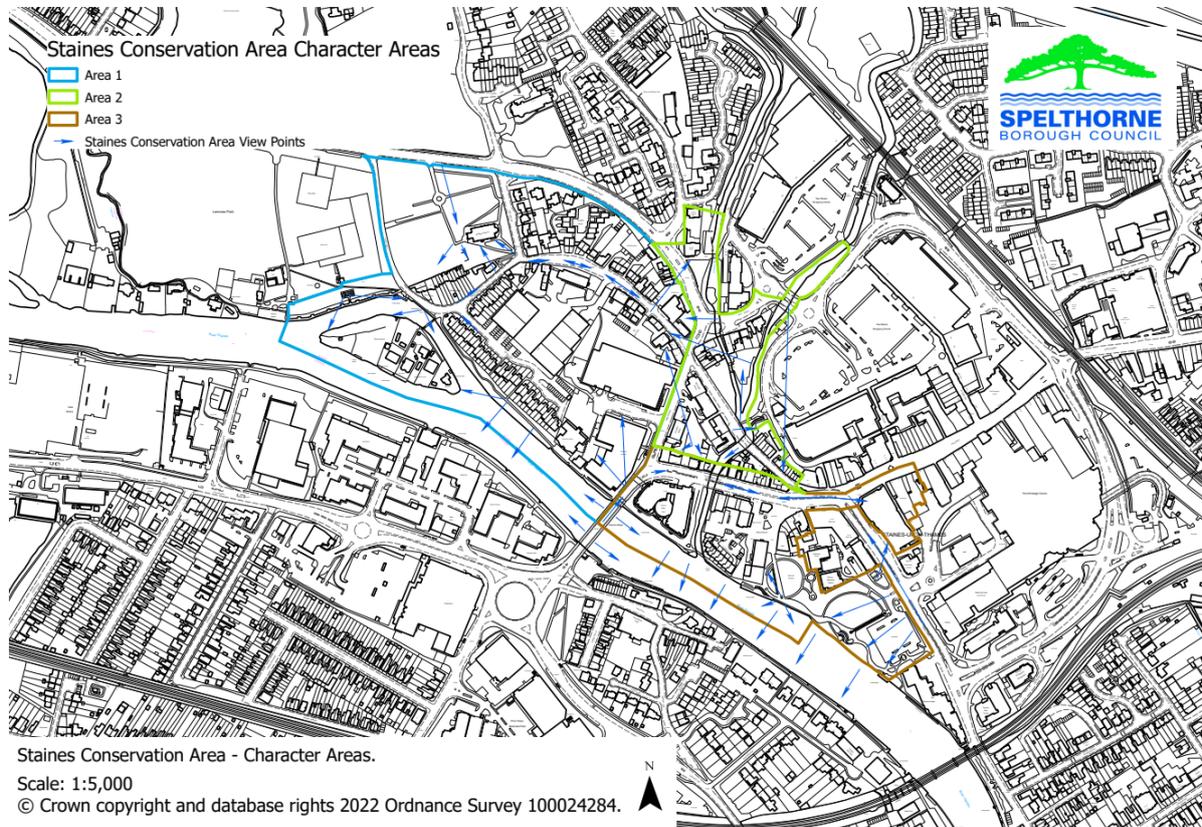
**Appendix 2**

**Illustrative visual of the proposed area of the MUGA in Memorial Gardens SUT.**  
Size of the MUGA is subject to the final design, images and sizes are for illustrative purposes only

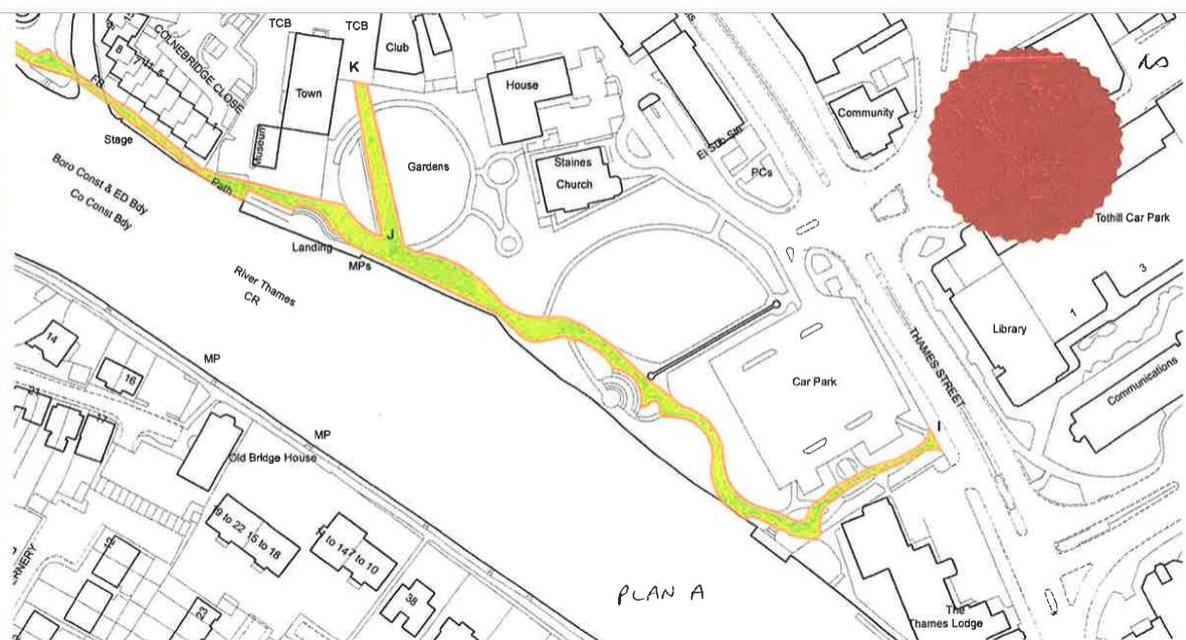


# Appendix 3 Map of Staines Conservation Area and Dedicated Bridleway within Memorial Gardens

## Map of Staines Conservation Area



## Dedicated bridleway



## Appendix 4

### Flood risk issues to be addressed and EA flood risk map.

#### Flood Risk EA checklist.

##### 1. Flood Risk and Drainage

- ✓ Flood Risk Assessment (FRA): Required if in Zone 2/3 or >1 ha. Should cover:  
Likely flood depths and velocities  
Surface water runoff  
Impact on downstream flooding
  - ✓ Surface Water Management:  
Use permeable surfaces if possible (e.g., permeable tarmac, porous artificial turf).  
Install SUDS (swales, retention ponds, filter drains).  
Ensure runoff does not go directly into the river.
- 

##### 2. Ecological and Biodiversity Protection

- ✓ Ecological Survey: Identify protected species (otters, water voles, bats, birds).
  - ✓ Habitat Mitigation:  
Maintain riparian buffer zone (ideally 8–10 m from river edge).  
Avoid disturbing natural vegetation.  
Plant native species to compensate for habitat loss.
  - ✓ Timing of Works: Avoid breeding seasons for wildlife (spring–summer for birds, mammals).
- 

##### 3. Green Belt Compliance

- ✓ Justify MUGA as Appropriate Use:  
Must be community or school-linked recreation.  
Avoid permanent large structures (high fencing, floodlights) unless essential.
  - ✓ Minimize Visual Impact:  
Use low fencing, natural colours, no tall floodlights if possible.
- 

##### 4. Pollution Prevention

- ✓ Runoff Management: Capture or filter rainwater to prevent debris or chemicals reaching river.
  - ✓ Material Choice: Avoid rubber crumb or hazardous chemicals that can leach into soil/water.
  - ✓ Waste Management Plan: Ensure litter and sports waste don't enter river.
- 

##### 5. Permits and Approvals

- ✓ Planning Permission: Needed for green belt land; may need design/landscape statements.
  - ✓ Flood Risk Activity Permit: Required if works are in or near the river channel.
  - ✓ Environmental Permit: Required if there's risk to water quality or habitats.
- 

##### 6. Noise

- ✓ Noise Assessment: Especially for schools or community facilities near residential areas.
-



This page is intentionally left blank



### 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	17/2/26
Commissioner engagement (if report focused on issues of concern to Commissioners such as Finance, Assets etc)	No	Sent 17/2/26
Relevant Group Head review	SM DA CM	18/2/26 19/2/26 18/2/26
MAT+ review (to have been circulated <b>at least 5 working days before Stage 2</b> )	Yes	
This item is on the Forward Plan for the relevant committee	Yes	
	Reviewed by	
Finance comments (circulate to Finance)	AS	25.02.26
Risk comments (circulate to Lee O'Neil)	LO	23.02.26
Legal comments (circulate to Legal team)	WB	25.02.26
HR comments (if applicable)	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 <b>5 working days before MAT</b>	L Heron	25/02/26
S151 Officer commentary – at least <b>5 working days before MAT</b>	T.Collier	18/2/26
Confirm final report cleared by MAT		

# Environment and Sustainability

19 March 2026

<b>Title</b>	<i>The Spelthorne Borough Council Off-Street Parking Places (Amendment No.3) Order 2026</i>
<b>Purpose of the report</b>	To make a recommendation to Corporate Policy and Resources Committee and Council
<b>Report Author</b>	<i>Jackie Taylor</i> <i>Group Head Neighbourhood Services</i>
<b>Ward(s) Affected</b>	All Wards
<b>Exempt</b>	No
<b>Exemption Reason</b>	Not applicable
<b>Corporate Priority</b>	Community Services
<b>Recommendations</b>	The Committee is asked to identify and recommend to the Corporate Policy and Resources Committee the selected proposed variations (set out in <b>paragraph 3.2</b> of this report) to The Spelthorne Borough Council Off-Street Parking Places (Amendment No. 3) Order 2026.
<b>Reason for Recommendation</b>	The purpose of this report is to provide the Environment and Sustainability Committee with details of the proposed amendments to the Spelthorne Borough Council Off-Street Parking Places (Amendment No.3) Order 2026, to enable the Committee to identify and recommend these variations to the Corporate Policy and Resources Committee as detailed in <b>2.5</b> of this report.

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

<b>What is the situation</b>	<b>Why we want to do something</b>
<ul style="list-style-type: none"> <li><i>Proposed amendments to “The Spelthorne Borough Council (Off-Street Parking Places Order) Amendment no.3) Order 2026</i></li> </ul>	<ul style="list-style-type: none"> <li><i>When proposing to make any changes to the parking order and its schedules the changes must be agreed by Council and the amended order made.</i></li> </ul>
<b>This is what we want to do about it</b>	<b>These are the next steps</b>

<ul style="list-style-type: none"> <li>• Consider the proposals within this report and identify and agree to recommend the committees selected variations to CPRC.</li> </ul>	<ul style="list-style-type: none"> <li>• As agreed at Council on 23 October 2025 these proposed amendments must be discussed and agreed at Environment and Sustainability Committee for onward approval at Corporate Policy and Resources (CPRC) in April 2026 before recommendations are put to Council in July 2026.</li> </ul>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

## 2. Key issues

- 2.1 The Council's current Parking Policy was set in 2020 following an extensive consultation and engagement exercise. This established the current Spelthorne Borough Council (Off-Street Parking Places) (OSPPO) Order 2020.
- 2.2 Spelthorne Borough Council manages thirty-eight car parks, ensuring accessibility with free motorcycle parking as well as designated disabled parking spaces at most locations.
- 2.3 Public car parks are an amenity provided by the Council for the convenience of the public. In shopping and recreational areas, they also encourage and maintain the viability of businesses but the income from the car parking charges is expected to, at least, cover the cost of providing and maintaining the car parks.
- 2.4 On Thursday 18 September 2026 a report was presented to the Environment and Sustainability Committee detailing proposed amendments to the SBC OSPPO. The Committee resolved to make a recommendation to Council as set out in paragraph 2.5. below.
- 2.5 **On 18 September, the Committee resolved to make a recommendation to Council to:**
1. Authorise the Group Head Neighbourhood Services to proceed with the proposals made in this report and to implement the Spelthorne Borough Council Off-street Parking Places (Amendment No. 3) Order 2026.
  2. Authorise the Group Head Corporate Governance to publish all notices required to implement the Spelthorne Borough Council Off-street Parking Places (Amendment No. 3) Order 2026; and
  3. Authorise the Group Head Neighbourhood Services, in consultation with the Group Head Corporate Governance, to consider and address any objections and to amend the proposal if necessary, following the public consultation.
- 2.6 The report was subsequently presented to Council and debated at its meeting on 23 October 2025. At that meeting, the Parking Services Operational Manager advised that, should approval be granted, a one-month public consultation period would take place before any proposed amendments could become enforceable.
- 2.7 **On 23 October 2025, Council resolved to:**

1. Authorise the Group Head Neighbourhood Services to proceed with the consultation proposals made in this report and to implement the Spelthorne Borough Council Off-street Parking Places (Amendment no. 3) Order 2026, Council, 23 October 2025.

2. Authorise the Group Head Corporate Governance to publish all notices required to implement the Spelthorne Borough Council Off-street Parking Places (Amendment no. 3) Order 2026; and

3. Before the order is made, the Group Head Neighbourhood Services will report on the outcome of the consultation and any necessary proposed amendments to the relevant Committees (Environment and Sustainability, Corporate Policy and Resources and Council)

- 2.8 During the Council meeting, Members raised several concerns regarding the proposals to remove the nil tariff entirely from four car parks, and/or to reduce the tariff in other car parks from one hour to thirty minutes, particularly in relation to car parks located near parks and green spaces.
- 2.9 Members considered that such changes could have an adverse impact on residents' health and wellbeing. It was therefore confirmed that the consultation would proceed and that, following its completion, a further report would be presented setting out the results and any recommended amendments prior to final determination as set out in paragraph 2.7.
- 2.10 Local councils do not have a statutory duty to provide free parking. Car parks incur significant costs, including, maintenance, lighting, security, staffing, business rates, and long-term infrastructure upgrades. In a period of financial pressure on public services, councils should aim to make car parks financially sustainable rather than subsidising them through general domestic rates taxation. The income and expenditure for all car parks excluding maintenance and back-office services is as below:

Year	Expenditure	Income
2025/2026	£1,174,900	£1,658,800
2026/2027	£1,168,600	£1,663,800

- 2.11 In a period of continued financial pressure on public services, it is necessary for parking services to operate on a financially sustainable basis rather than being subsidised through general Council funds. Achieving cost recovery may require increases in charges. While such increases may be unpopular, they reduce pressure on the wider Council budget and help protect frontline services. A sustainable pricing model also enables reinvestment in maintenance, technology, accessibility, and service improvements.

#### **Results of the consultation**

- 2.12 In accordance with statutory requirements, a Notice of Proposal was published in the **Surrey Advertiser** on 12 December 2025 and circulated to statutory consultees. No objections were received from statutory consultees during the consultation period.
- 2.13 The consultation opened on 12 December 2025 and, following an extended period for comments and objections, closed on 26 January 2026. Officers are required to consider all representations received before submitting the original

or amended Notice of Proposal to Council in July 2026, seeking approval for the Order to be made.

2.14 A total of 180 responses were received from individual respondents. All 180 responses raised objections and/or comments on the proposals.

- 180 Responses from individual people
- 180 of those responding raised objections and comments.

2.15 The table below at 2.16 sets out the main reasons for residents objecting and/or commenting on the proposals.

## 2.16 Summary of Consultation Themes and Impacts

<b>Theme</b>	<b>Key Issues Raised</b>	<b>Potential Impacts Identified</b>
<b>Clarity of information</b>	Information in the Notice of Proposal was unclear, leading to misunderstanding about the change from pay-and-display to free parking with a 30-minute maximum wait time.	Confusion among the public about how the car parks would operate and what was being proposed.
<b>Insufficient parking time (general use)</b>	Thirty minutes is not enough time to shop, socialise, attend appointments, walk dogs, exercise, or spend time in green spaces.	Reduced use of town centre, parks, and community facilities; fewer visitors; reduced dwell time.
<b>Impact on local businesses</b>	Thirty minutes is not sufficient for dining in restaurants or visiting shops.	Loss of trade, reduced customer numbers, and negative economic impact on local businesses.
<b>Families and children</b>	Insufficient time for parents dropping off or collecting children, including school trips.	Increased stress for parents, potential safety concerns, and reduced use of facilities linked to schools and events.
<b>Disabled users and accessibility</b>	Disabled users require more time to park and manage wheelchairs or pushchairs.	Disproportionate impact on people with disabilities and carers; reduced accessibility and inclusion.
<b>Health and wellbeing</b>	Reduced time in parks and green spaces; concerns about mental health and obesity.	Potential negative effects on physical health, mental wellbeing, and community use of open spaces.
<b>Community and faith groups</b>	Church services and community activities would be affected.	Reduced attendance and disruption to regular community and faith-based events.
<b>Council-run and local events</b>	Impact on events in the Walled Garden promoted by the Council.	Reduced attendance, operational difficulties, and reputational impact for Council events.

Theme	Key Issues Raised	Potential Impacts Identified
<b>On-street parking pressures</b>	Reduced free parking time may lead to displacement onto surrounding streets.	Increased on-street congestion, parking conflicts, and enforcement pressures.
<b>Parking permit charges</b>	Objections to the increase in permit charges.	Financial impact on residents and permit holders; increased dissatisfaction with parking policies.

## Conclusion

- 2.17 The consultation responses demonstrate concerns from residents, businesses, community groups and other stakeholders regarding the proposed reduction or removal of the nil tariff period in car parks. This proposed change is also associated with the suggested introduction of a maximum thirty-minute wait limit in four car parks and the reduction from one hour to a thirty-minute free parking period in other first hour free car parks.
- 2.18 While there is recognition of the Council's need to manage parking effectively and sustainably, the volume and consistency of objections indicate that the proposed changes may have unintended adverse impacts on car park users.
- 2.19 Failure to proceed with the proposed changes to off-street parking tariffs and free parking periods would result in the loss of approximately £37k of forecast additional income. As this income is contingent on approval of the proposals, it has not been incorporated into the 2026/27 budget. Consequently, the parking service would be required to operate without this anticipated revenue uplift, increasing pressure on the existing budget and reducing financial resilience. To offset this shortfall and sustain current service provision, the Council would need to consider other ways to compensate income streams or implement cost reductions within the parking service.
- 2.20 While the Council has previously offered first hour free parking in eight of all its car parks, supported by revenue from fee-paying car parks, this practice is no longer sustainable due to rising operational costs, inflation, increased Business Rates, and staffing expenses.
- 2.21 It is therefore appropriate for the Committee to consider amendments to the original proposals before any final determination is made, in accordance with the resolution of Council on 23 October 2025. A summary of proposals relative to this OSPPO can be found at **Appendix A**

## 3. Options appraisal and proposal

### 3.1 Options

- 1a.** Change of the nil charge first hour tariff to 30 minutes, and addition of a tariff point with charge for 1-hour stays, as detailed in **Appendix 2 Schedule 6** or
- 1b. Retain the current one-hour nil tariff period in car parks and make no changes to the order or the tariffs.
- 2a. Removal of Abbey Drive, Dumsey Meadow, Old Bathing Station and Green Street from **Schedule 1** chargeable tariffs, and addition of same

car parks to **Schedule 3** Free parking places with 30 minutes maximum stay, as detailed in **Appendix 2, Schedule 1, Schedule 3, and Schedule 6** or

- 2b.** Removal of Abbey Drive, Dumsey Meadow, Old Bathing Station and Green Street from **Schedule 1** chargeable tariffs, and addition of same car parks to **Schedule 3** with 11 hours maximum stay. Most free parking locations operate with a maximum permitted stay of eleven hours, which accords with the arrangements applied to other free car parks specified within the Parking Order.
- 3a.** Introduce a “no return within the same charging period” in all car parks listed in **Appendix 2 Schedule 1**
- 3b.** Do not introduce a “no return within the same charging period” in any of the car parks.
- 4.** Revise the Parking Order map for Spelthorne Leisure Centre, to accurately reflect the new layout, as detail in **Appendix 3.**
- 5.** Introduce other minor amendments as detailed in **Appendix 1 and 2 and schedules 1, 2 and 3.**
- 6.** Change of the Staines-upon-Thames Short and Long Stay tariffs and introduction of reference to the charges being per parking session, as detailed in **Appendix2, Schedule 4 and Schedule 5.**

### 3.2 Officer preferred recommendations

Item	Option	Rationale
1. Off-street free parking period	<b>1a.</b> Approve the change from a nil-charge first hour to a 30-minute free period, with the introduction of a new 1-hour paid tariff, as detailed in Appendix 2, Schedule 6.	Option 1a is recommended as it improves revenue yield from short-stay parking while retaining limited free provision.
2. Reclassification of specified car parks	<b>2b.</b> Remove Abbey Drive, Dumsey Meadow, Old Bathing Station and Green Street from Schedule 1 chargeable tariffs and add to Schedule 3 as free parking places with a maximum stay of 11 hours, in line with most other free parking locations, as detailed in Appendix 2, Schedules 1 and 3.	Option 2b is recommended as it provides consistency with other free parking locations and reduces maintenance, enforcement, and monitoring costs.
3. Return parking restriction	<b>3a.</b> Introduce a “no return within the same charging period” restriction in all car parks listed in Appendix 2, Schedule 1.	Prevents repeated short stays to avoid payment, protecting income and improving space availability.
4. Parking Order map amendment	<b>4.</b> Approve the revision of the Parking Order map for Spelthorne Leisure Centre to accurately reflect the revised layout in Appendix 3.	Ensures enforceability and reduces operational and legal risk.
5. Minor amendments	<b>5.</b> Approve the introduction of other minor amendments as detailed in Appendices 1 and 2 and Schedules 1, 2 and 3.	Improves clarity, consistency, and operational efficiency.

6. Staines-upon-Thames tariff structure	<b>6.</b> Approve changes to the Staines-upon-Thames Short and Long Stay tariffs and introduce explicit reference to charges being applied per parking session, as detailed in Appendix 2, Schedules 4 and 5.	Strengthens the tariff framework, improves transparency.
-----------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------

### 3.3 Options not recommended.

It is recommended that Options 1b, 2a, and 3b not be approved, as they fail to sufficiently address the principal concerns raised during the consultation process and do not adequately consider the requirement to ensure the financial sustainability of the Council’s car park services.

## 4. Risk implications

### 4.1 Strategic Risks

There is a risk that the proposed amendments, in particular the reduction or removal of the nil tariff period and increases in parking charges, could be perceived as discouraging access to town centres, parks, green spaces, and community facilities, potentially conflicting with the Council’s Community priority. This risk has been mitigated by taking account of consultation feedback and amending the original proposals. In response to concerns raised by Members, residents, businesses and car park users, the recommended option provides for a maximum stay of 11 hours rather than 30 minutes (**Recommendation 2b**), supporting accessibility while balancing financial objectives.

### 4.2 Operational Risks

Changes to tariffs and waiting restrictions may create initial confusion for users and increase enforcement demands. To mitigate this risk the Council will ensure that clear signage to reflect any updates will be displayed in all car parks affected by the proposed changes. Advance notification will also be provided on all social media platforms.

### 4.3 Financial Risks

**Reduced Parking Usage:** Increasing parking charges, especially at recreational venues, could lead to a decrease in usage as people seek alternative activities or locations.

**Loss of Income:** If the overall impact of the fee increases is negative, it could result in a net loss of approx. £37k (full year) income for the Council.

There is a risk that changes may not generate the projected income if usage reduces, or conversely, that retaining the one-hour nil tariff may limit cost recovery. To mitigate these risks the Council will continue with its monthly income monitoring which will help to determine if a recommendation that tariffs need to be adjusted is considered in future parking order reviews.

## 5. Financial implications

5.1 The Council's off-street car parks incur significant annual operating costs, including but not limited to: -

- Maintenance and repairs
- Lighting and utilities
- Staffing and enforcement
- Business rates
- Insurance
- IT systems and payment infrastructure
- Long-term capital maintenance and resurfacing

5.2 Parking income contributes toward the recovery of these costs and supports the financial sustainability of the service. These changes are necessary to address rising operational costs, maintain the self-funding nature of parking services, and invest in improvements to public car parks.

5.3 Increasing tariffs and reducing nil tariff periods would support cost recovery and reduce pressure on the wider Council budget. Conversely, retaining the one-hour free period in certain locations may reduce potential additional income but may help sustain town centre footfall and community use. Removing car parks from chargeable to free car parks will reduce costs in terms of business rates and enforcement. A summary of the financial impacts is listed below.

Proposal	Estimated Financial Impact (Annual)
Reduction of nil tariff to 30 minutes	Income from this reduction from 1 hour to 30 minutes (which is subject to usage patterns) has the potential to increase by £18k per year.
Removal of charging at four specified car parks	The saving on maintenance and business rates is anticipated to be approx. £2300 for a full year which is subject to the rates charges being removed. There will be other savings in terms of officer time in that officers will be able to enforce other areas more frequently.
Increase in Staines tariffs	Changes to the tariffs for both short and long stay car parks is anticipated to be £17k per year,
Introduction of no return rule	This is an operational control measure which has little or no benefit to income.

## 6. Legal comments

6.1 The relevant legal implications have been considered within the report. The proposals as set out are within the legal framework for changes to car parking orders.

## Corporate implications

### 7. S151 Officer comments.

7.1 The S151 Officer confirms that all financial implications have been taken into account.

### 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 There are no procurement implications arising directly from this report. .

## 10. Equality and Diversity

10.1 The consultation responses identified concerns regarding the impact on:

- Disabled users requiring additional time to park and mobilise.
- Older residents with reduced mobility.

10.2 Reducing the nil tariff period may have an impact on individuals who require longer parking durations for access and mobility reasons. However, it should be noted that all users displaying a **valid Blue Badge are entitled to an additional one hour free of charge**, in addition to their paid-for parking period, in accordance with the Council's current parking policy. This provision is intended to allow additional time for those with mobility needs and helps mitigate potential adverse impacts on disabled users.

10.3 While the proposed parking variations, including modest fee increases and a recreational fee structure change, aim to ensure the sustainability of public parking services, we are committed to maintaining accessibility for disabled users. There will be no reduction in the number of designated parking bays for disabled individuals. These changes are designed to be equitable inclusive, ensuring that everyone can benefit from our public parking services.

10.4 The proposals set out in this report have taken consultation feedback into consideration and seek to balance the Council's need for financial sustainability with the principles of accessibility, fairness, and inclusion. The impact of any approved changes will be monitored, and further review will be undertaken if disproportionate impacts on protected groups are identified. The summary of the Equality Impact assessment is at **Appendix B**.

## 11. Sustainability/Climate Change Implications

11.1 Parking policy can influence travel behaviour. Adjustments to tariffs may:

- Encourage shorter stays and higher turnover in town centres.
- Influence modal shift where viable alternatives (walking, cycling, public transport) are available.
- Reduce unnecessary long-duration parking in high-demand areas.

However, care must be taken to avoid displacement to on-street residential areas, which could increase congestion and emissions.

If implemented the proposals will be monitored to assess any unintended environmental impacts.

## 12. Other considerations

12.1 Public perception and stakeholder relationships remain important considerations.

Given the strength of feedback received, Members may wish to consider a balanced approach that differentiates between town centre commercial car parks and those adjacent to parks and community facilities. The options laid out in **Section 3** of this report and **Appendix A** will assist members to make fully informed decisions on the proposed amendments to **The Spelthorne Borough Council Off-Street Parking Places (Amendment No.3) Order 2026**.

### 13. Timetable for implementation

Milestone	Date
Consultation completed	26 January 2026
Report to Environment and Sustainability Committee	19 March 2026
Consideration by Corporate Policy and Resources Committee	20 April 2026
Council decision	16 July 2026
Publication of Making Order Notice	Following Council approval
Implementation of amended tariffs and conditions	Within 4–6 weeks of Order being made

### 14. Contact

*Jackie Taylor Group Head Neighbourhood Services 01784446418*

#### Background papers:

[Issue details - The Spelthorne Borough Council \(Off-Street Parking Places Order\) Amendment No.3\) Order 2026 - Spelthorne Borough Council](#)

#### Appendices:

**Appendix A Summary of options for proposed changes**  
**Appendix B Summary Equality Impact Assessment**

This page is intentionally left blank

Appendix A

Option no.	Proposal	Car Park	Pros	Cons
1a	Remove 1-hour free parking as detailed in Schedule 6 and replace with a reduced period of 30 minutes free parking. Addition of a tariff point with charge for 1-hour stays.	Manor Park Shepperton Laleham Village Hall Thames Street Sunbury Orchard Meadow Sunbury Walled Garden Sunbury Shepperton Village Hall	Increases turnover in high demand locations. Generates extra income. Encourage shorter stays and availability of spaces. Aligns with objectives to manage parking demand more actively. Council will achieve the additional income anticipated from these measures	Opposed during public consultation Potential negative impact on footfall and local businesses Displacement of parking on to surrounding residential streets
1b	Do nothing and retain the current one-hour nil tariff period.	Manor Park Shepperton Laleham Village Hall Thames Street Sunbury Orchard Meadow Sunbury Walled Garden Sunbury Shepperton Village Hall	Reflects consultation feedback. Encourages longer dwell time. Avoids increased on-street parking	Lower income Reduced parking turnover Does not address the concerns about long-stay parking in high demand car parks Council will not achieve the additional income anticipated from these measures
2a	Remove car parks from chargeable tariffs <b>Schedule 1</b> chargeable tariffs and addition of same car parks to <b>Schedule 3</b> Free parking places with 30 minutes maximum stay.	Abbey Drive Green St Dumsey Meadow Old Bathing Station	Prevent all day or overnight parking. Improves space availability. Reduces enforcement complexity.	Loss of parking income Risk of long stay and/or commuter parking Potential for reduced spaces during busy periods

2b	Remove car parks from chargeable tariffs <b>Schedule 1</b> chargeable tariffs and addition of same car parks to <b>Schedule 3</b> Free parking places with 11 hours maximum stay.	Abbey Drive Green St Dumsey Meadow Old Bathing Station	Strongly supports access to parks and riverside locations.  Encourages outdoor activity, health, and well-being.  Responds positively to consultation responses.  Reduces costs associated with managing the car park.  Improves access for families.	Requires monitoring and enforcement.
3a	Introduce a “no return within the same charging period”.	Those listed in <b>Schedule 1</b>	Prevent repeated short stays to avoid charges.  Improves space availability and turnover.  Common parking control mechanism.	May inconvenience legitimate users making multiple visits.
3b	Do nothing and do not introduce a “no return within the same charging period”.	Those listed in <b>Schedule 1</b>	Simple to administer.	Enables avoidance of charges.  Reduced effectiveness of parking controls  Less efficient use of available spaces
4	Revise the Parking Order map for Spelthorne Leisure Centre to reflect the new layout.	Spelthorne LC (old) Eclipse LC (new)	Enables accuracy and legal clarity within the parking order.  Refects current site layout and naming  Reduces the risk of enforcement challenges.  Administrative update with minimal impact on users	No direct operational or financial benefit  Minor cost associated with updating documentation
5	Introduce other minor amendments	<b>All schedules</b>	Improves clarity, consistency, and accuracy of the parking order.	Limited standalone impact

		<p>Revise wording for new “pay on foot system” .</p> <p>Enable use of virtual contract permits.</p> <p>Remove reference to season ticket no longer available.</p> <p>Clarify FOC motorbike parking in designated bays only.</p> <p>Revise wording re members and staff parking scheme.</p> <p>Redraft reference to the “Traffic Management Act” 2004.</p> <p>Update the latest debt registration fee cost.</p> <p>Remove reference to max charge of £1000 for film companies.</p>	<p>Addresses anomalies and update references.</p> <p>Reduces risk of misinterpretation or enforcement issues.</p> <p>Supports effective administration of parking services</p>	
6	Increase/reduce parking tariffs	<p>Staines upon Thames short and long stay car parks and add “per parking session”.</p>	<p>Increased income Benchmarking evidenced the need to increase some tariffs and reduce others to be comparative with other regional car parks</p> <p>Generate increased income</p>	<p>Minor cost associated with updating documentation</p>

## Appendix B

### Equality Impact Assessment (Summary)

#### Spelthorne Borough Council (Off-Street Parking Places Order – Amendment No. 3) Order 2026

##### Purpose

This Equality Impact Assessment considers the potential effects of the proposed amendments to the Off-Street Parking Places Order and ensures compliance with the Public Sector Equality Duty under Section 149 of the Equality Act 2010.

##### Potential Impacts

Consultation responses identified potential impacts particularly in relation to:

- **Disability** – Disabled users may require additional time to park and access facilities.
- **Age** – Older residents may need longer parking durations due to reduced mobility.

Reducing the nil tariff period may disproportionately affect those who require longer access time.

##### Mitigation

- Blue Badge holders are entitled to an additional one-hour free parking over and above their paid-for period, in accordance with current Council policy.
- Accessible parking bays will continue to be provided in line with statutory requirements.
- Consultation feedback has been considered in shaping the final proposals.
- Impacts will be monitored following implementation, with further review undertaken if disproportionate effects are identified.

##### Conclusion

The Council has had due regard to its duties under the Equality Act 2010. While some impacts have been identified, mitigation measures are in place to reduce disadvantage. The proposals seek to balance financial sustainability with accessibility and inclusion.



**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**

<b>ITEM</b>	<b>Yes / No</b>	<b>Date</b>
Councillor engagement / input from Chair prior to briefing	yes	29/12/2025
Commissioner engagement (if report focused on issues of concern to Commissioners such as Finance, Assets etc)	yes	29/12/2025
Relevant Group Head review	yes	29/12/2025
MAT+ review (to have been circulated <b>at least 5 working days before Stage 2</b> )		
This item is on the Forward Plan for the relevant committee	yes	29/12/2025
	<b>Reviewed by</b>	
Finance comments (circulate to Finance)	EG	26/1/2026
Risk comments (circulate to Lee O’Neil)	LO	30/1/2026
Legal comments (circulate to Legal team)	LH	30/01/2026
HR comments (if applicable)		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**

<b>ITEM</b>	<b>Completed by</b>	<b>Date</b>
Monitoring Officer commentary – at least <b>5 working days before MAT</b>	L Heron	30/01/2026
S151 Officer commentary – at least <b>5 working days before MAT</b>	T Collier	22/1/2026
Confirm final report cleared by MAT	<b>Due at MAT 3/3/26</b>	



# Environment and Sustainability Committee

Date of meeting **Thursday 19 March 2026**

<b>Title</b>	<i>Halliford Recreation Ground</i>
<b>Purpose of the report</b>	To make a decision
<b>Report Author</b>	<i>Jackie Taylor Group Head Neighbourhood Services</i>
<b>Ward(s) Affected</b>	All Wards
<b>Exempt</b>	No
<b>Exemption Reason</b>	Not applicable
<b>Corporate Priority</b>	Community Environment Services
<b>Recommendations</b>	<p><b>Committee is asked to:</b>  <b>Authorise the Group Head Neighbourhood Services to:</b></p> <ol style="list-style-type: none"> <li>1. Relocate the play facility in the recreation ground from its current position in a wooded area to the open space within the same park.</li> <li>2. Undertake all necessary ground works to facilitate the move.</li> <li>3. Undertake ground restoration and tree planting in the wooded area once the equipment and fencing have been removed.</li> </ol>
<b>Reason for Recommendation</b>	The current play facility is situated within a wooded area of Halliford Recreation Ground, where several mature trees close to the play area boundary pose a potential safety risk. To avoid the loss of these valuable trees, it is recommended that they remain in situ and that the play area is relocated to a more open area within the park.

## 1. Executive summary of the report

What is the situation	Why we want to do something
<ul style="list-style-type: none"> <li>• The current play facility is located within a predominantly wooded area of the park.</li> <li>• Several large, mature trees are situated along the boundary of the play area fencing.</li> </ul>	<ul style="list-style-type: none"> <li>• Formal risk assessments have identified that the presence of these large mature trees within the wooded area, despite their healthy condition, presents an ongoing risk to the safety of play area users.</li> </ul>

<ul style="list-style-type: none"> <li>• The proximity of these large trees presents a potential safety risk to users of the play facility.</li> <li>• Community Infrastructure Levy (CIL) funding has already been allocated to replace the existing outdated play equipment.</li> <li>• Relocating the play facility to another area of the park would reduce tree-related risks while enabling the planned investment to be delivered safely.</li> </ul>	
<p>This is what we want to do about it</p>	<p>These are the next steps</p>
<ul style="list-style-type: none"> <li>• Re-site the play facility from its current location within the recreation ground to an alternative open area within the same park.</li> <li>• Dispose of the existing play equipment and procure and install new play equipment which has been awarded CIL funding.</li> </ul>	<ul style="list-style-type: none"> <li>• Further discuss relocation options with the planning team.</li> <li>• Undertake a ground survey to confirm the absence of underground services within the area allocated for the new play facility.</li> <li>• Procure and install the new play equipment.</li> <li>• Restore the ground following the removal of the existing play equipment and fencing.</li> </ul>

## 2. Key issues

- 2.1 The play facility within Halliford Recreation Ground is due to be replaced, as the existing equipment, constructed of wood is ageing and has reached the end of its serviceable life.
- 2.2 Community Infrastructure Levy (CIL) funding of £80,000 was approved by the CIL Board and subsequently agreed by the Corporate Policy & Resources Committee on Monday 13 October 2025, to support the procurement, purchase, and installation of new play equipment.
- 2.3 The current play facility is located within what has become a predominantly wooded area, with several large but healthy mature trees in proximity.
- 2.4 The existing location of the play area has access challenges for the public users especially those with pushchairs or individuals with mobility challenges. The new location is proposed to be close to the existing car park and in more open area and near a footpath.
- 2.5 A recent risk assessment identified concerns relating to the large mature oak trees situated along the boundary of the play area. Although these trees appear visually healthy, they pose an ongoing risk to users of the play facility due to falling debris, deadwood, and other unforeseen factors that could result in limb failure.
- 2.6 Removing this risk from the existing location of the playground would require the removal of these mature trees. While this may be appropriate if the trees

were in poor health, given their good condition and environmental value, this is not considered to be the most appropriate or sustainable option.

- 2.7 Halliford Recreation Ground comprises a mix of dense wooded areas that support biodiversity and wildlife, areas of uncut grass, and open parkland that is used by residents, visitors and dog walkers.
- 2.8 Re-siting the play facility within another area of the park would not adversely impact dog walkers, as the play area would remain fenced and the remaining open parkland would continue to provide sufficient space for all users of the recreation ground.
- 2.9 A map showing the existing and proposed play area locations is attached at **Appendix 1**. This demonstrates that the relocation will not negatively impact play provision and will, in fact, enhance the facility by reducing issues currently experienced at the existing site, such as tree debris and bird fouling caused by the proximity of mature trees.
- 2.10 We have undertaken a pre app consultation with planning who has responded as below:

*“I would like to note that the entire Halliford Park is in the Green Belt. The understanding is that the proposal is for re-location of an existing children playground due to safety concerns (to reduce antisocial behaviour and potential tree hazards) and there are also currently access challenges for the public users especially those with pushchairs or individuals with mobility challenges. The new location is shown close to the existing car park and in more open area and near a footpath.*

*Within the submitted information, it is indicated that most of the equipment including fencing will be moved across as well as adding an additional item (The new piece of equipment– multi play tower-no more than 4m in height). From the shown location, the new location will be well away from any residential properties and sets further back from the existing play area in terms of visual impact when viewed from Upper Halliford Road. It was also indicated that the existing playground will be reinstated with fruit trees. Furthermore, the Council’s Tree Officer raised no objection to your proposal for the new location on tree grounds. Although, he highlighted to you on site that you should set the playground further away from the adjacent Yew tree as the berry fruits are poisonous (to prevent children try eating them from the grounds).*

*Taking into account the proposal relates to a relocation of an existing playground and is away from residential properties, we are in a view that the proposed works can be carried under the Permitted Development under Class A, Part 12 (Development by local authorities), Schedule 2 of the GPDO and as such no planning permission will be required.”*

### **3. Options appraisal and proposal**

#### **3.1 Option 1 (Preferred Option)**

The Committee is asked to agree that, following a procurement exercise, the new play equipment be installed in the proposed new location (**as shown in Appendix 1**). Once the new facility has been installed and brought into use, the existing play

facility would be removed, and restoration works, including the planting of new trees, would be undertaken to reinstate the former site as green space.

### **3.2 Option 2 (not recommended)**

An alternative option would be to remove the trees that pose a potential risk to users of the play area. This option is not recommended, as the trees located along the boundary of the existing play area are currently in good health and are of significant environmental value. They contribute to wildlife habitats, support biodiversity, and provide carbon sequestration benefits due to their maturity and number.

## **4. Risk implications**

### **4.1 Option 1:**

Low risk. Relocating the play facility reduces tree-related safety risks to users, avoids the need for tree removal, and preserves environmental benefits. Any risks are limited to standard procurement and installation processes, which will be managed through existing controls.

The new location will be positioned at a safe distance from existing berry-producing trees in this area of the park to avoid potential hazards to play area users

### **Option 2:**

Higher risk. Retaining the play facility in its current location would require the removal of mature trees, leading to environmental loss, potential objections, and reputational risk. If trees are retained, ongoing safety risks to users would remain, requiring continued monitoring and maintenance.

## **5. Financial implications**

5.1 Funding for the procurement and installation of the new play equipment has already been authorised by the CIL Board. The existing fencing would be relocated to the proposed new site, and any additional costs due to the relocation of the play area, beyond the approved CIL funding of £80,000 would be covered from existing play area improvement budgets.

5.2 Due to the high number of new play areas that have recently been, and continue to be, installed as a direct result of CIL funding, we anticipate that overall play area maintenance costs will be lower in 2026/27. This budget is therefore expected to cover any additional costs arising directly from the relocation of the play area at Halliford Park.

## **6. Legal comments**

6.1 Advice and assistance from the Legal Team will be obtained in the review of the legal title to the proposed new site to ascertain all and any covenants or restrictions to which the land might be subject.

6.2 Advice and assistance from the Legal team will be obtained in the preparation of contracts associated with the proposed works.

## **Corporate implications**

### **7. S151 Officer comments**

7.1 The Section 151 Officers confirms that all financial implications have been taken into account and that the recommendations are fully funded within the Capital Programme and Revenue 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 Relevant procurement implications have been addressed in the report to the Corporate Policy and Resources Committee on 13 October 2026 but there are no procurement implications arising directly from this report.

## **10. Equality and Diversity**

- 10.1 The recommended proposals to relocate and upgrade the play facility will have a positive impact on equality and diversity by providing a safe, accessible, and inclusive play environment for children of all abilities.
- 10.2 The new equipment will comply with current accessibility standards, ensuring children with disabilities can use the facility safely and comfortably. Mitigation measures include careful site design to maintain level access paths, appropriate surfacing, and consideration of inclusive play features.
- 10.3 Additionally, the relocation will not restrict access for any user group, including dog walkers or residents, and the restored former site will continue to provide open green space for public use.

## **11. Sustainability/Climate Change Implications**

In conclusion, the relocation of the play facility within Halliford Recreation Ground represents the most balanced and sustainable approach. It enables the Council to deliver the planned investment in new play equipment using the approved CIL funding, while significantly reducing safety risks to users and avoiding the unnecessary removal of mature, environmentally valuable trees. The preferred option therefore provides a safer, more resilient play facility and supports the long-term environmental and recreational objectives of the park.

## **12. Other considerations**

- 12.1 There are none.

## **13. Timetable for implementation**

- 13.1 Funding and approval for the procurement of the new play equipment have already been secured. Subject to approval from the Environment & Sustainability, the procurement process will commence as soon as possible to ensure timely delivery and installation of the new facility. This new play area is expected to be delivered in early Summer 2026

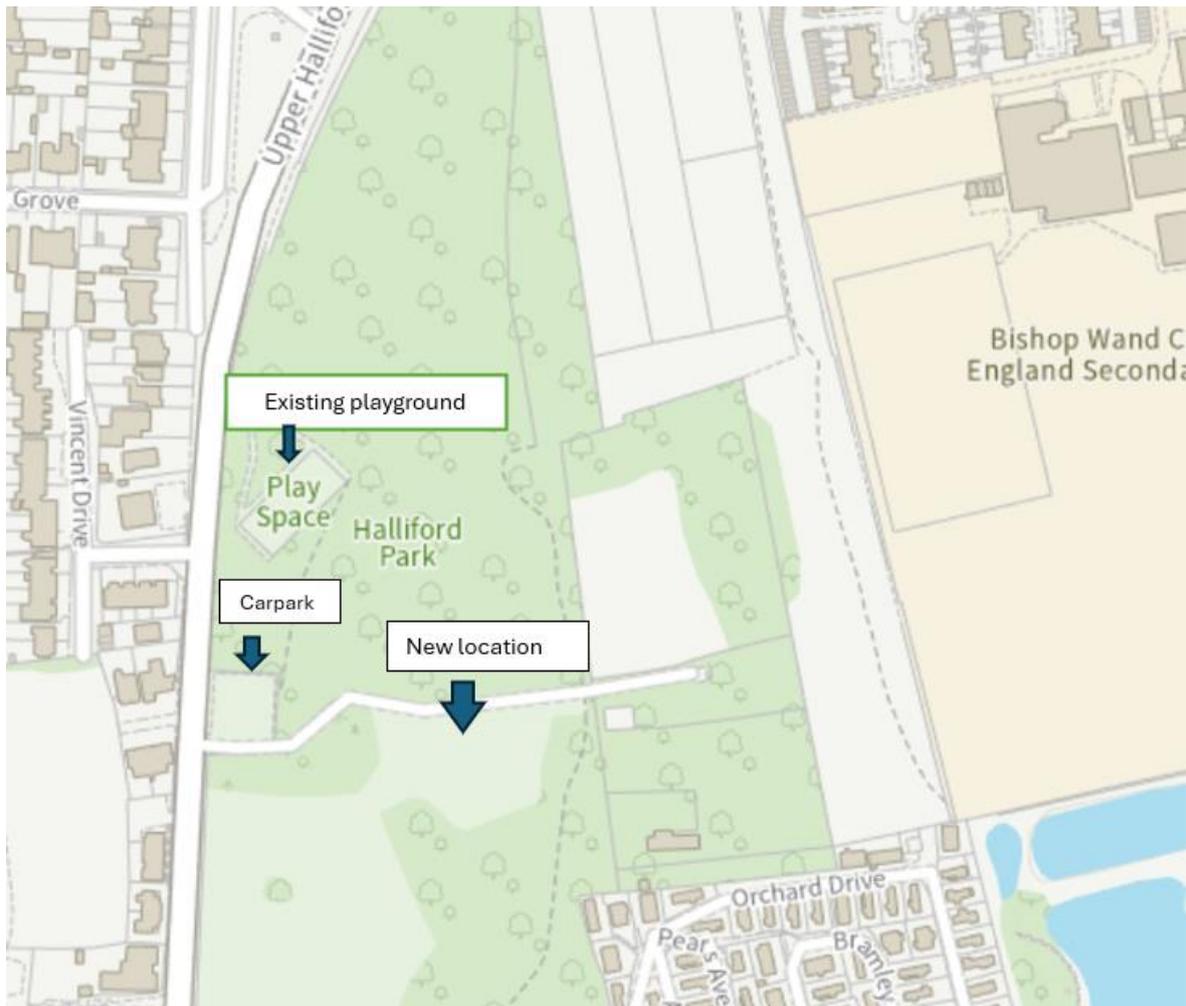
## **14. Contact**

- 14.1 Jackie Taylor Group Head Neighbourhood Services 01784 446418

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

**Background papers: There are none.**

**Appendices: Appendix 1 Site map**





## Spelthorne Borough Council Services Committees Forward Plan and Key Decisions

This Forward Plan sets out the decisions which the Service Committees expect to take over the forthcoming months, and identifies those which are **Key Decisions**.

A **Key Decision** is a decision to be taken by the Service Committee, which is either likely to result in significant expenditure or savings or to have significant effects on those living or working in an area comprising two or more wards in the Borough.

Please direct any enquiries about this Plan to [CommitteeServices@spelthorne.gov.uk](mailto:CommitteeServices@spelthorne.gov.uk).

## Spelthorne Borough Council

### Service Committees Forward Plan and Key Decisions for 1 March 2026 to 31 December 2026

Anticipated earliest (or next) date of decision and decision maker	Matter for consideration	Key or non-Key Decision	Decision to be taken in Public or Private	Lead Officer
Environment and Sustainability Committee 16 03 2026  Council 18 03 2026	Adoption of Local Plan	Non-Key Decision	Public	Jane Robinson, Principal Planning Officer
Environment and Sustainability Committee 16 03 2026	HMO Supplementary Planning Guidance Consultations Draft	Key Decision	Public	Simon Rowberry, Interim Planning Development Manager
Environment and Sustainability Committee 19 03 2026  Environment and Sustainability Committee 18 06 2026	Affordable Housing SPD	Key Decision	Public	Jane Robinson, Principal Planning Officer
Environment and Sustainability Committee 19 03 2026	Closure of Public Bring Sites	Key Decision	Public	Jackie Taylor, Group Head - Neighbourhood Services
Environment and Sustainability Committee 19 03 2026	MUGA - Memorial Gardens	Key Decision	Public	Jackie Taylor, Group Head - Neighbourhood Services

Date of decision and decision maker	Matter for consideration	Key or non-Key Decision	Decision to be taken in Public or Private	Lead Officer
Environment and Sustainability Committee 19 03 2026  Corporate Policy and Resources Committee 18 05 2026  Council 16 07 2026	Parking Order Amendment	Key Decision	Public	Jackie Taylor, Group Head - Neighbourhood Services
Environment and Sustainability Committee 19 03 2026	Relocation of the Halliford Play Area	Key Decision	Public	Jackie Taylor, Group Head - Neighbourhood Services
Council  Environment and Sustainability Committee	Re-adoption of Climate Change Supplementary Planning Document	Non-Key Decision	Public	Jane Robinson, Principal Planning Officer

This page is intentionally left blank