



**Spelthorne  
Borough Council**

Extraordinary Council Meeting  
Monday, 29 June 2026





19 June 2026

*Please reply to:*

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To the Councillors of Spelthorne Borough Council

I hereby summon you to attend an extraordinary meeting of the Council to be held at The Council's Offices, Knowle Green, Staines-upon-Thames on **Monday, 29 June 2026** commencing at **7.00 pm** for the transaction of the following business.

Gordon Mitchell  
*Interim Chief Executive*

Councillors are encouraged to wear their badge of past office at the Council meeting.

*Councillors are reminded to notify Committee Services of any Gifts and Hospitality offered to you since the last Council meeting so that these may be entered in the Gifts and Hospitality Declaration book.*

## AGENDA

Description	Page nos.
<p><b>1. Apologies for absence</b> To receive any apologies for non-attendance.</p>	
<p><b>2. Disclosures of Interest</b> To receive any disclosures of interest from Councillors in accordance with the Council's Code of Conduct for Members.</p>	
<p><b>3. Adoption of Spelthorne Affordable Housing Supplementary Planning Document (SPD) and Climate Change Supplementary Planning Document (SPD) following statutory consultation</b> To consider the adoption of the Spelthorne Affordable Housing Supplementary Planning Document and Updated Climate Change Supplementary Planning Guidance under Regulation 14 of the Town and Country Planning (Local Planning) Regulations 2012.</p>	5 - 242



**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	Ongoing since 11/2/26
Commissioner engagement (if report focused on issues of concern to Commissioners such as Finance, Assets etc)	Yes	Ongoing since 23/2/26
Relevant Group Head review	Yes	24/2/26
<b>MAT+ review (to have been circulated 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>25/02/26</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 5 working days before MAT	L Heron	19/06/26

S151 Officer commentary – at least <b>5 working days before MAT</b>	<b>T.Collier</b>	<b>19/6/2026</b>
Commissioner Engagement	<b>[Commissioners</b>	<b>19/06/26</b>
		<b>No issues</b>
Confirm final report cleared by MAT		

# Council

29 June 2026

<b>Title</b>	Adoption of Spelthorne Affordable Housing Supplementary Planning Document (SPD) and Climate Change Supplementary Planning Document (SPD) following statutory consultation
<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>	<b>Council is asked to:</b> Adopt the <ul style="list-style-type: none"><li>• Spelthorne Affordable Housing Supplementary Planning Document (SPD) and</li><li>• Updated Climate Change Supplementary Planning Guidance (SPD)</li></ul> under Regulation 14 of the Town and Country Planning (Local Planning) Regulations 2012
<b>Reason for Recommendation</b>	<p>The Affordable Housing Supplementary Planning Document (SPD) was prepared in collaboration with a cross-party Member Steering group, supported by officers and consultants JJ 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 (SPD) was adopted by the Council on 25 April 2024. Following the adoption of the Local Plan in March 2026, the SPD has been updated to ensure alignment with the latest Local Plan policies, updated national policy, and to provide clearer guidance on implementation of climate mitigation and adaptation measures.</p> <p>A statutory four-week public consultation on both documents ran from 8 May to 5 June 2026. Following a recommendation by the Environment and Sustainability Committee on 18 June, the Council is asked to adopt both documents.</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 SPDs are not adopted by this date, they would instead be adopted as non-statutory Technical Guidance, which would carry reduced 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 four-week consultation was scheduled for 8 May to 5 June 2026.</li> </ol>	<ol style="list-style-type: none"> <li>4. The Affordable Housing and Climate Change SPDs provide detailed guidance to support, the effective implementation of the Spelthorne Local Plan 2024-2039/40.</li> <li>5. 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> </ol>
This is what we want to do about it	These are the next steps
<ol style="list-style-type: none"> <li>6. Request that the Council adopt the Affordable Housing SPD and updated Climate Change SPD prior to the government deadline of 30 June 2026.</li> </ol>	<ol style="list-style-type: none"> <li>7. The Development Management Team use the documents as material considerations during the determination on planning applications.</li> </ol>

**2. Key issues**

Background

- 2.1 This report seeks for Council to make a decision to adopt the Affordable Housing and Climate Change Supplementary Planning Documents (SPDs) appendices A and D of this report. At a meeting of the Environment and Sustainability Committee on 18 June 2026, a recommendation was made to Council to adopt the documents.
- 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 support the Council's Local Plan Immediate Review which is expected to be submitted within two years of adoption of the Local Plan.
- 2.3 Once adopted, the SPDs will be material planning considerations 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 the delivery of affordable housing across a range of 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 SPD provides detailed 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 Alternative approaches considered 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
<ul style="list-style-type: none"> <li>• Social Rent</li> <li>• Affordable Rent</li> </ul>	35-40%	25-30%	25-30%	5-10%
Intermediate	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 has been used in the Local Plan Viability Study.

Eligibility and Affordability Criteria for Intermediate Housing

2.11 The 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 £80,000 will be eligible for Intermediate Ownership.
  - 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 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 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 The Local Plan sets out the following approach 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 potential approaches have been considered, summarised below:

- Approach 1 Difference in Gross Development Value between policy compliant and market only schemes: An approach which subtracts the Gross Development Value of the scheme assuming on-site affordable housing is provided, from the GDV of the scheme assuming no affordable housing is provided on-site (i.e. assuming 100% market tenure housing). This could be delivered via a formula-based approach but is also simple enough to be reflected in a worded description of the approach.
- Approach 2 (Draft SPD approach) as above, plus additional CIL and marketing costs: An approach which reflects the difference in GDV described in Approach 1 above but also subtracts additional Community Infrastructure Levy and Marketing Costs a developer will incur as a result of not providing on-site affordable housing. This can be delivered via a formula-based approach. This is the approach adopted in the draft Spelthorne Affordable Housing SPD.
- Approach 3 As Approach 2, plus an additional profit allowance to reflect increased risk: An approach which reflects Approach 2 above but also accounts for an additional profit allowance arising from the additional risk

that a developer incurs as a result of not providing on-site affordable housing. This can be delivered via a formula-based approach.

- Approach 4 Full appraisal comparison of on-site vs financial contribution scenarios: An approach which involves carrying out two appraisals (one assuming on-site provision and the other assuming a Financial Contribution in lieu). This would take account of additional Community Infrastructure Levy, Marketing Costs, an additional profit allowance and additional finance costs arising from not providing the affordable housing on-site (affordable housing is typically assumed to be paid early in the construction programme which reduces finance costs). This approach is not able to be implemented via the use of a formula, as it involves carrying out detailed development appraisals.
- Approach 5 A standardised tariff rate (e.g., per sq.m. charge): This involves adopting a specific tariff rate, typically a per sq. m rate applied to the floor area of the proposed scheme.

### **Viability Review Mechanisms**

2.16 The 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.

**Issues raised by Environment and Sustainability Committee**

- 2.23 The Committee expressed concern regarding the accuracy of the median price of dwellings in Spelthorne, as they felt it was too low. Consultants JJV explained they incorporated data from the Housing and Economic Development Needs Assessment (HEDNA) evidence and Table 2 of the Affordable Housing SPD shows the median house price by housing type (year to September 2024) using data available from the Land Registry.

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

- 2.24 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 adopted Local Plan.

- 2.25 It has always been the Council's intention that, following adoption of the Local Plan, the Climate Change SPD would be updated to align with and support the climate change policy within the Local Plan. This ensures that the SPD can continue to be applied in determining planning applications and that its requirements remain effective and enforceable.
- 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 key 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 will be required to 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 The Climate Change SPD has been updated following the adoption of the new Local Plan. It “hangs off” 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**

- 2.30 Two four-week statutory public consultations were undertaken from 8 May to 5 June 2026, one on the Affordable Housing SPD and one on the updated Climate Change SPD, to run. Statements of Consultation for both documents are set out in appendices B and E of the report.

### **Affordable Housing SPD**

2.31 A total of 19 responses were received. Table 1 below sets out the key issues raised and if the SPD has been amended as a result.

Table 1: Key Issues Raised and Changes to Affordable Housing SPD

<b>Key Issue</b>	<b>Changes to Affordable Housing SPD</b>
<p>A number of respondents raised that the document is complex and that the Council should consider measures to make the document easier to understand for non-experts.</p>	<p>The document is, in places, necessarily technical to ensure accuracy and clarity in addressing the subject matter.</p> <p>A number of changes have been made to the SPD to ensure it is as easy to understand as possible whilst remaining effective. This has included adding to the Glossary and adding introductory paragraphs to each chapter.</p> <p>A further thorough review of the wording has taken place, and a number of wording changes have been applied to remove duplication and ensure the wording of the SPD is as clear as possible.</p>
<p>Responses identified current viability and deliverability issues and the need for flexibility and pragmatism.</p>	<p>The SPD has retained a paragraph in the Introduction which acknowledges current viability and deliverability challenges which has been updated to refer to the Council's commitment to apply the SPD positively and pragmatically.</p>
<p>Responses have articulated that the SPD should clarify that affordable housing policy requirements should not apply to C2 Use Class uses that do not propose self-contained units, such as nursing and care homes.</p>	<p>Two new paragraphs are included in the SPD to clarify that the requirement for affordable housing in Local Plan policy H2 applies to specialist accommodation schemes that provide self-contained residential units, and that for schemes that do not provide self-contained accommodation, such as C2 care homes providing bedrooms only with a high level of care, an affordable housing requirement will not apply.</p>
<p>Responses identified that the SPD could benefit from additional data on Spelthorne.</p>	<p>We have added data on the population of Spelthorne and housing delivery in recent years.</p>
<p>Several responses stated that the SPD should address building design such as height or architectural heritage.</p>	<p>Building design largely falls outside the remit of this SPD. This is covered in the new Local Plan and in particular in the new Spelthorne Design Code which was adopted in March 2026.</p>

Key Issue	Changes to Affordable Housing SPD
	The Design Code is available online <sup>1</sup> .

2.32 Table 2 of the Affordable Housing Statement of Consultation (appendix B), which starts on page 5 of the appendix, gives detail of the representations received, the Council response and if any consequential amendments to the SPD have been made.

### **Climate Change SPD**

2.33 In total, 16 valid representations were received from the public, including residents, local groups, statutory consultees and other interested external organisations, to this consultation. Internal comments from other departments within the Council were also received.

2.34 The following issues were raised

- Some calls for stronger and more enforceable standards for energy efficiency, water saving, sustainability and climate adaptation measures and some concerns about unclear and vague guidance and checklists. Respondents also reiterated that SPD requirements should remain proportionate, viable, and aligned with the adopted Local Plan.
- Requests for stronger focus on groundwater, river and surface water flooding, including impacts on aquifers and drainage, alongside clearer developer guidance, mandatory mitigation measures, enhanced Sustainable Drainage System (SuDS) requirements, and greater consideration of groundwater effects.
- Suggestions for stronger energy guidance through recognised standards such as Passivhaus, LETI, NABERS and UK Net Zero Carbon Building Standards, alongside clearer requirements for heat pumps, district heating, renewable energy and energy storage. Respondents also reiterated the need to align with current regulations and Future Homes Standard requirements, while better distinguishing between residential and commercial standards.
- Strong support was expressed for active travel measures, including walking, cycling, EV charging infrastructure and travel hierarchy principles, alongside better public transport integration, uses and experiences and reduced reliance on private vehicles.
- Support for urban greening, tree planting, green infrastructure and climate resilience measures, alongside calls for evidence-based greening and air quality assessments. Some calls for local food production through allotments, communal growing spaces and gardens.
- Some identified greater consistency needed for definitions, technical terminology explanation, diagrams, checklists and acronym expansion. Formatting, typographical and other clerical errors should be amended.

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<sup>1</sup> <https://www.spelthorne.gov.uk/page/1351/spelthorne-design-code>

- Some concerns that SPD requirements could exceed Local Plan policy and affect development viability, alongside calls for greater flexibility to reflect site-specific constraints, commercial uses and the scale of development.
- 2.35 Table 1 of the Climate Change Statement of Consultation (appendix D), gives detail of the representations

### **Adoption**

- 2.36 Following consultation, officers and consultants have reviewed and incorporated feedback as appropriate. The updated SPDs were presented to the Environment and Sustainability Committee and were recommended to Council for adoption. Once adopted by Council, the Affordable Housing SPD and Climate Change SPD will form part of the Council's planning policy framework and will be used as material considerations in planning decision making.

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

- 3.1 **Option 1 – Preferred option:** The Council adopts both the Affordable Housing and Climate Change Supplementary Planning Documents (SPDs). This option will ensure that the Council has clear, up-to-date and policy aligned guidance in place to support consistent and effective decision-making, particularly in relation to affordable housing delivery and climate change mitigation. Adoption will also ensure the SPDs carry full statutory weight as material planning considerations.
- 3.2 **Option 2 – Not Recommended:** The Council does not adopt the Affordable Housing and Climate Change Supplementary Planning Documents (SPDs). This option is not recommended, as it would result in the SPDs not being formally adopted before the Government's deadline of 30 June 2026. In this scenario, the documents could only be issued as non-statutory guidance with reduced weight in decision-making, limiting their effectiveness in supporting policy implementation and delivery outcomes.

## **4. Risk implications**

- 4.1 A risk register was maintained throughout preparation of the SPDs and was regularly reviewed to document, assess, and mitigate potential risks.
- 4.2 Adoption of the SPDs provides an opportunity to strengthen the Council's planning framework and demonstrate a clear commitment to delivering high quality, sustainable development. Proceeding to adoption reinforces the Council's proactive approach to implementing Local Plan policies.
- 4.3 Failure to adopt the SPDs following the statutory public consultations may result in significant reputational damage to the Council, undermining its commitment to community engagement, transparency, and proactive planning.

- 4.4 The Council has already invested considerable financial and staff resources in the development of both the Affordable Housing SPD and Climate Change SPD. Adoption ensures that this investment delivers tangible benefits by supporting consistent decision-making and enabling the effective implementation of Local Plan policies.
- 4.5 The SPDs support a consistent and proactive approach to affordable housing delivery and climate change mitigation. Without adoption, there would be a risk that decision making may be less consistent, potentially reducing the Council's ability to maximise delivery outcomes across the Borough.
- 4.6 Adoption prior to the Government's deadline of 30 June 2026 ensures that the SPDs retained their full statutory status and weight as material considerations. If the Council does not adopt the SPDs by the Government's deadline of 30 June 2026 there are only two possible alternatives, both of which present significant risks.
- 4.7 The SPDs would instead be issued as non-statutory technical guidance, which would carry 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.
- 4.8 Alternatively, the SPDs would need to be progressed as Supplementary Plans. This would introduce additional procedural requirements including examination, and is likely to require additional resources, time, and cost, given the detailed legislative framework is very new and no local authority has yet gone through it.

## **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 is split across financial years, with 50% incurred in last financial year, and 50% in 2026/27.
- 5.2 If the Council is unable to adopt the SPDs before the Government's deadline of 30 June 2026 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 fee for David Lock Associates to update the Climate Change Supplementary Planning Document was £6,581.

## **6. Legal comments**

- 6.1 Without adopted SPDs in place, the Council's ability to apply Local Plan policies consistently and robustly would be reduced. This could limit the Council's ability to secure appropriate levels of affordable housing and ensure developments adequately address climate change requirements.
- 6.2 The SPDs provide clear and transparent guidance to applicants and decision-makers, supporting more consistent outcomes aligned with identified needs of the local community. In addition, the statutory consultation process undertaken prior to adoption has provided an opportunity for stakeholders and

the local community to input into the guidance, strengthening its legitimacy and ensuring that it reflects local priorities.

- 6.3 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 prior to 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. Commissioners' comments**

- 7.1 *No issues.*

### **8. S151 Officer comments**

- 8.1 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 nightly paid accommodation and Temporary Accommodation arrangements which has a significant ongoing revenue budget pressure. The S151 Officer confirms that all direct financial implications relating to the report's proposal have been taken into account and that the recommendations are fully funded from within the 2026-27 budget.

### **9. Monitoring Officer comments**

- 9.1 Provided that the relevant consultation and publication requirements have been complied with, the Monitoring Officer confirms that the relevant legal implications have been taken into account and the Council may lawfully proceed to adopt the SPDs.

### **10. Procurement comments**

- 10.1 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.

### **11. Equality and Diversity**

- 11.1 An Equalities Impact Assessment (EIA) has been completed for the Affordable Housing SPD. It is attached at appendix C.
- 11.2 An Equalities Impact Assessment (EIA) has been completed for the Climate Change SPD. It is attached at appendix F.

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

- 12.1 Updating 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. Adopting before the June 2026 deadline protects the SPD's planning weight, helping secure consistent delivery of the borough's climate objectives.
- 12.2 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.

## **13. Other considerations**

- 13.1 It was not considered good practice to undertake public consultation during the pre-election period. Therefore, the four-week consultation was undertaken from 8 May to 5 June 2026. The government has a set deadline of 30 June 2026 by which all new SPDs need to be adopted. This meant a tight timeline to analyse consultation responses and progress the documents through Environment and Sustainability Committee and Council for adoption.
- 13.2 If either document is not agreed by Council it can be delivered as non-statutory technical guidance after 30 June 2026.

## **14. Timetable for implementation**

- 14.1 Once adopted by Council, the Affordable Housing SPD and Climate Change SPD will immediately form part of the statutory development plan for Spelthorne. In accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004, it will be used in the determination of any planning application from the following day.

## **15. Contact**

- 15.1 *Strategic Planning team; [planning.policy@spelthorne.gov.uk](mailto:planning.policy@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 – 18 June 2026 - [Issue details - Statutory Consultation on Spelthorne Affordable Housing Supplementary Planning Document...](#)

[Environment and Sustainability Committee report – 19 March 2026 - Statutory Consultation on Spelthorne Affordable Housing Supplementary Planning Document \(SPD\) and Climate Change Supplementary Planning Document \(SPD\)](#)

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

**Appendices:**

Appendix A: Spelthorne Affordable Housing SPD - June 2026

Appendix B: Affordable Housing SPD – Statement of Consultation

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

Appendix D: Climate Change SPD - June 2026

Appendix E: Climate Change SPD – Statement of Consultation

Appendix F: Climate Change SPD - Equalities Impact Assessment (EIA)

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**Affordable Housing**

**Supplementary Planning Document**

**June 2026**



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## **List of Acronyms**

**AUV – Alternative Use Value**

**BLV – Benchmark Land Value**

**CIL – Community Infrastructure Levy**

**DM – Development Management**

**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 tenures, dwelling types, sizes, and standards are expected. In particular, the document expresses that Social Rent housing is a priority, and that, with respect to Intermediate affordable housing, Intermediate Rent housing is preferred.
  - 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. It explains when a Financial Viability Assessment may be justified, what information and assumptions it must include, and how the Council will assess issues such as development value, costs, developer return and benchmark land value to determine the maximum viable affordable housing contribution.
  - When and how off-site provision or financial contributions may be accepted instead of on-site affordable housing provision. On-site provision is expected unless exceptional circumstances are evidenced.
  - How Viability Review Mechanisms will be used. In most cases, a formula-based approach to these is expected.
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.
- 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, and applying this SPD, 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**

2.1 This section sets out the relevant policy and guidance background to affordable housing provision in Spelthorne. It summarises aspects of national policy and the Spelthorne Local Plan 2024 – 2039/40, which have informed the SPD.

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

2.2 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.

2.3 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.

2.4 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.

2.5 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.

2.6 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.

2.7 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.

- 2.8 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).
- 2.9 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.
- 2.10 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.
- 2.11 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.
- 2.12 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**

- 2.13 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

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<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%.

management policies, as well as thematic policies, including those relating to sustainable development, delivering homes and supporting growth.

- 2.14 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.
- 2.15 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.
- 2.16 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.
- 2.17 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.
- 2.18 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.
- 2.19 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.
- 2.20 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.
- 2.21 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.

- 2.22 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>
- 2.23 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.
- 2.24 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.
- 2.25 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. 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.
- 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

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<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 on-site and there is a demonstrated unmet need.

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 2024 - 2039/40**

2.30 The Spelthorne Local Plan was adopted in March 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 supported housing are considered in the Affordable Housing Delivery section of this SPD.

#### **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 Part 2 (a) of the policy states that the sizes, types and tenure of homes provided will be determined on the basis of local needs as identified having regard to the SHMA or subsequent affordable housing needs evidence commissioned or produced by the Council. Where available, wider sources relating to affordable housing need may also be considered to understand needs more local to a development proposal.
- 2.38 Part 2 (d) of the policy also states that the tenure split should be informed by the most up-to-date Council evidence. The tenure and number of bedrooms of the affordable homes provided on each qualifying site must contribute towards meeting the mix of affordable housing needs identified in the Strategic Housing Market Assessment, or subsequent affordable housing needs evidence commissioned or produced by the Council. The supporting text at paragraph 6.30 also confirms that the Council will have due regard to the priority needs of the Borough, as set out in the Housing Register maintained by the Council.
- 2.39 The 2019 SHMA update identified a tenure split of 75% Social Rent / Affordable Rent, with 25% Intermediate home ownership. The Local Plan refers to the provision of intermediate homes as 25% First Homes as per national guidance, as well as the national policy requirement to provide a minimum of 10% affordable home ownership. However, these are no longer requirements in national policy and do not reflect the housing needs within the Borough. In addition, government has consulted on introducing a minimum requirement for the provision of Social Rent within the updated NPPF.
- 2.40 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 HEDNA and Housing Register, and aligns with the national policy emphasis on delivering Social Rent where possible. This also reflects the approach to intermediate housing in the NPPF which no longer prioritises First Homes or other intermediate ownership products.

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

- 2.41 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

- 2.42 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

- 2.43 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

- 2.44 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

- 2.45 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 Review Mechanisms

- 2.46 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.

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

- 3.1 This section summarises the key indicators of need that underpin the Council's preferred approaches to affordable housing.
- 3.2 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.

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

- 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 units over the period to 2035, taking into account re-let supply which would be expected to be delivered primarily as Social Rent / Affordable Rented housing for households on the Council's Housing Register.<sup>3</sup> This evidence supports the continued prioritisation of Social Rent and Affordable Rent delivery in Spelthorne.
- 3.4 While not a like for like comparison, Social Rent / Affordable 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 Rent / Affordable Rent, and 10% as affordable home ownership. This aligns directly with the 75% Social Rent / Affordable 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 is considered further below.
- 3.8 The following bedroom size mix for affordable housing was recommended:

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<sup>3</sup> The study uses the term affordable rented housing as an overarching term for Social / Affordable rented housing. Definitions for these tenures are set out in the glossary to this SPD.

<b>Table 1: SHMA Update Recommended Bedroom Size Mix</b>				
	<b>1 bed</b>	<b>2 bed</b>	<b>3 bed</b>	<b>4 bed</b>
<b>Social Rent / Affordable 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. The study also referred to data from the Housing Learning and Information Network suggesting that just under 40% of older persons accommodation supply should be rented accommodation, including Social Rent.
- 3.10 The SHMA 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.

#### Demographics

- 3.13 As of mid-2024, the population of Spelthorne is estimated in the HEDNA to be 107,100. This represents an increase of around 8.1% since 2011, which is broadly similar to that seen across the South East and England and above that of Surrey.

#### Existing Housing Stock

- 3.14 Data from the 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

- 3.15 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.

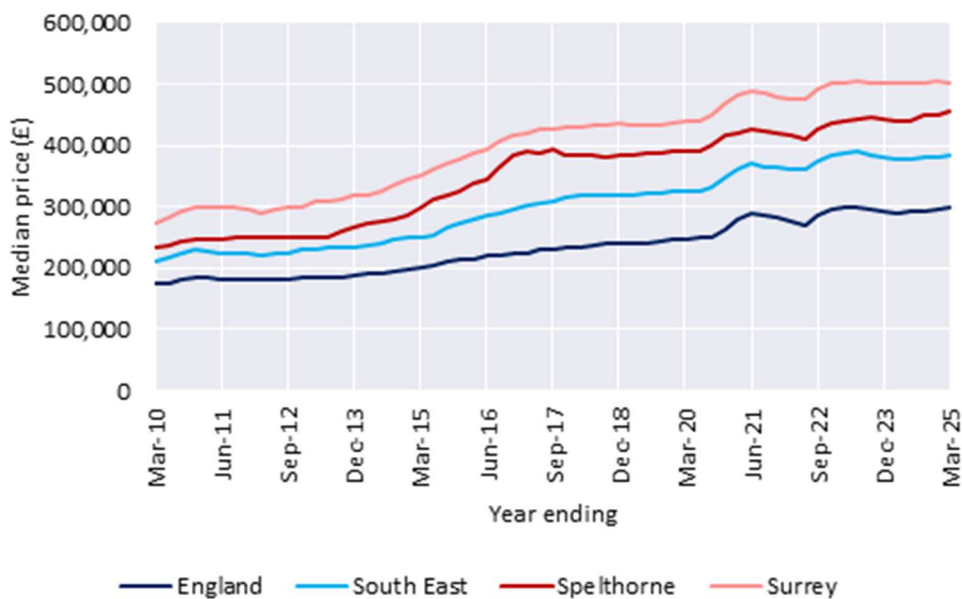
### Occupancy and Overcrowding

- 3.16 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.
- 3.17 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

- 3.18 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)

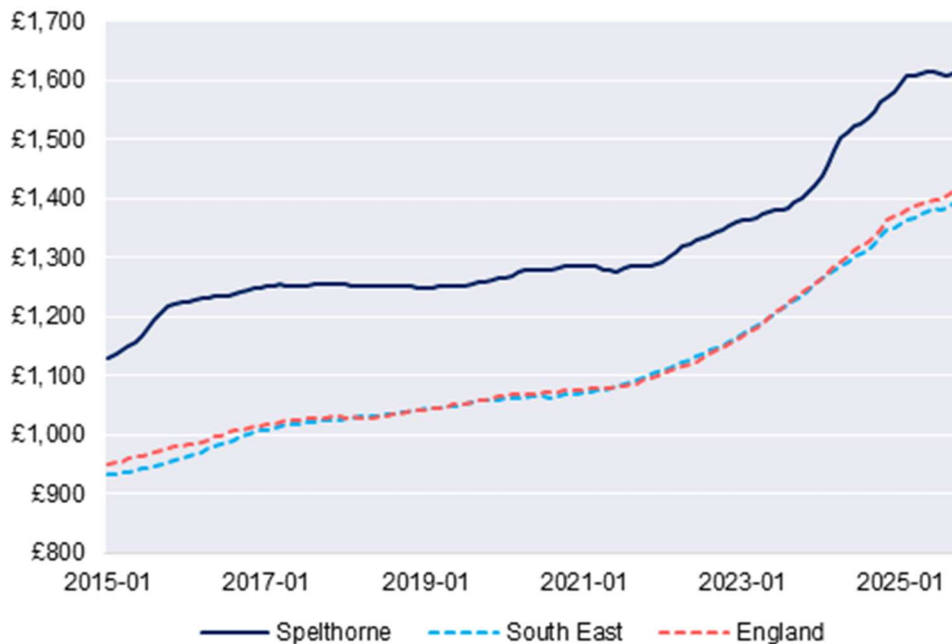
- 3.19 During the period 2015-2025 the median house price in Spelthorne has increased by 51.7% (£155,050 in absolute terms). The following table shows the median house price by housing type (year to September 2024).

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

### Affordability

- 3.20 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 it has become much more difficult for workers in Spelthorne to afford a home in the area.
- 3.21 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

- 3.22 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.
- 3.23 Median, 25<sup>th</sup> and 75<sup>th</sup> percentile earnings in 2024 are set out in the table below.<sup>4</sup>

<sup>4</sup> ONS Annual Survey of Hours and Earnings (HEDNA).

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

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

#### Population Profile

3.25 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>5</sup> This highlights the need for family sized housing in the area.

#### Housing Needs

3.26 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.

3.27 The housing needs assessment in the HEDNA undertaken through the Standard Method shows an overall housing need for 793 dwellings per annum.

3.28 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.

3.29 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. The HEDNA recommends a tenure split between Social Rent / Affordable 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 Social Rent / Affordable 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 priority for 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

<sup>5</sup> ONS (HEDNA).

significant forms of need.<sup>6</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.

<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 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 latest housing evidence also identifies a high need for Social Rent housing and a balanced bedroom size mix. This evidence forms the basis of the Council's requirement for a 75% Social Rent / Affordable Rent: 25% Intermediate tenure split, prioritising the provision of Social Rent, and the bedroom size mix set out in Section 4 of this SPD.

<sup>6</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.

### **Housing Development in Spelthorne – Latest Position**

- 3.35 The Authority Monitoring Report 2025 described that in 2024/25 105 affordable homes were granted planning permission and 200 affordable dwellings under construction. Overall housing delivery for the last three years for which data is available is set out in the table below:

<b>Table 6: Overall Housing Delivery – 2022/23 to 2024/25</b>			
	<b>2022/23</b>	<b>2023/24</b>	<b>2024/25</b>
<b>Dwellings completed (net)</b>	138	287	194
<b>Dwellings under construction</b>	1320	1509	1445
<b>Dwellings with planning permission (not started) (net)</b>	878	333	412

## 4. Affordable Housing Delivery

4.1 This section sets out the Council’s detailed approach to affordable housing delivery in Spelthorne. It explains when affordable housing is required, the thresholds that apply to different types of development, and the expected tenure mix, dwelling sizes, standards and design principles. It also provides guidance on accessible homes and other residential development types, including Build to Rent, specialist accommodation, self and custom build housing, and community-led or rural exception schemes.

### Affordable Housing Thresholds

4.2 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 and Site Allocations which take precedence.

Table 7: Affordable Housing Thresholds Summary Table		
Site Type	Development Type	Affordable Housing Required (By Unit)
<b>Brownfield Sites</b>	<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)
<b>Greenfield Sites</b>		50% (20% Build to Rent)
<b>Non-Greenfield sites within the Green Belt</b>		45% (35% Build to Rent)
<b>Sites allocated within the Spelthorne Local Plan 2024 – 2039/40</b>	As specified in Local Plan Chapter 10: Allocations	

4.3 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.

4.4 For major residential proposals on non-greenfield sites (including Grey Belt) in the Green Belt subject to a planning application, 45% affordable housing will be required.<sup>7</sup>

4.5 Where an affordable housing requirement is specified for a site allocated in Section 10 of the Spelthorne Local Plan 2024 – 2039/40, the site allocation requirement will apply. Where an affordable housing requirement is not specified for a site allocated in Section 10 of the Spelthorne Local Plan 2024 – 2039/40, affordable housing requirements will apply in line with the paragraphs above.

4.6 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

<sup>7</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%.

number of Social / Affordable Rent units will be rounded up to the nearest whole unit.<sup>8</sup>

- 4.7 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.
- 4.8 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 provided on-site, will be subject to viability assessment in line with the approach set out further below.<sup>9</sup>
- 4.9 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**

- 4.10 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>Affordable Housing Type</b>	<b>Proportion</b>	<b>Relevant Criteria</b>
<b>Social Rent / Affordable Rent</b>	75%	<ul style="list-style-type: none"> <li>• Priority is for Social Rent.</li> <li>• Total housing costs for 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 should be 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> </ul>

<sup>8</sup> Affordable housing numbers will be rounded to the nearest whole unit based on the net dwelling requirement. The 75% Social Rent / Affordable 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.

<sup>9</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.

		<ul style="list-style-type: none"> <li>• Total housing costs not to exceed 40% of maximum net income.</li> </ul>
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- 4.11 The Council will require a tenure split of 75% Social Rent / Affordable Rent and 25% Intermediate housing (Intermediate Rent, Shared Ownership) based on the assessments of housing need, as referred to further above.

### **Social Rent / Affordable Rent Housing**

- 4.12 Social Rent and Affordable Rent are tenures that are provided for households in greatest housing need on the Council's Housing Register.
- 4.13 The Council's priority is for the delivery of Social Rent when meeting the Local Plan 75% tenure requirement for Social / Affordable rent. This is provided at rents set in accordance with government policy and is the tenure that most effectively addresses housing need.<sup>10</sup> 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>11</sup>
- 4.14 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.
- 4.15 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, total housing costs should not exceed the relevant LHA rate and should also not be higher than 80% of market rent.<sup>12</sup>

### **Intermediate Housing**

- 4.16 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

- 4.17 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

<sup>10</sup> Details of Social Rent are set out in policy and guidance published by government and the Social Housing Regulator. The latest versions of these documents at the date of this SPD are available at the following: <https://www.gov.uk/government/publications/direction-on-the-rent-standard-2026/policy-statement-on-rents-for-social-housing>

<https://www.gov.uk/government/publications/rent-standard-2026>

<sup>11</sup> Government has also consulted 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>12</sup> Rents should not exceed 80% of market rents for the specific home (inclusive of service charges). Although LHA rates are not referred to in the formal definition of affordable rent, they are commonly used in higher value areas as an affordability benchmark to help ensure that affordable rent is more affordable for low income households.

affordable home ownership product, this form of affordable housing can be provided instead.

- 4.18 Intermediate Rent is a discounted market rent product, provided in perpetuity, based on median incomes for households who are not eligible for Social Rent / Affordable Rent. 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.
- 4.19 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>13</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.
- 4.20 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

- 4.21 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>14</sup> and government guidance<sup>15</sup>.
- 4.22 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>16</sup>. These affordability requirements will be secured in S106 Agreements.
- 4.23 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>17</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.

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<sup>13</sup> Further guidance on the Council's approach to key worker housing is available here: <https://democracy.spelthorne.gov.uk/documents/s33540/Key%20Worker%20Housing%20Policy%20Final%20Draft.pdf>

<sup>14</sup> <https://www.spelthorne.gov.uk/media/2015>

<sup>15</sup> <https://www.gov.uk/shared-ownership-scheme>

<sup>16</sup> Net income calculated on the basis of 70% of gross income. Affordability criteria in line with London Plan approach.

<sup>17</sup> <https://www.gov.uk/guidance/first-homes>

### Eligibility for Intermediate Housing

- 4.24 Households with a gross income of up to £65,000 will be eligible for Intermediate Rent.<sup>18</sup>
- 4.25 Households with a gross income of up to £80,000 will be eligible for Intermediate ownership products.<sup>19</sup> Further eligibility criteria are set out in national guidance for Shared Ownership and First Homes (see footnote link).
- 4.26 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.

### Dwelling Types, Sizes, Standards and Design

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

	1 bed	2 bed	3 bed	4 bed
<b>Social Rent / Affordable Rent</b>	35-40%	25-30%	25-30%	5-10%
<b>Intermediate</b>	15-25%	40-45%	25-35%	5-10%

- 4.28 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.
- 4.29 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.
- 4.30 Unit sizes should not be lower than Nationally Described Space Standards (“NDSS”), and occupancy levels should not exceed those set out in NDSS.<sup>20</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>21</sup>, Homes England Building for a Healthy Life principles<sup>22</sup> and Spelthorne Borough Council’s Design Code<sup>23</sup>.

<sup>18</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>19</sup> Or as updated in national guidance.

<sup>20</sup> <https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard>

<sup>21</sup> <https://www.gov.uk/government/publications/national-design-guide>

<sup>22</sup> <https://www.designforhomes.org/wp-content/uploads/2020/11/BFL-2020-Brochure.pdf>

<sup>23</sup> <https://www.spelthorne.gov.uk/page/1351/spelthorne-design-code>

### **Accessible Homes**

- 4.31 The NPPF requires local planning authorities to plan for people in their area with specific housing needs, including older people, and people with disabilities.
- 4.32 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.
- 4.33 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 where 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.
- 4.34 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 Council's 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.
- 4.35 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% Social Rent/ Affordable 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**

- 4.36 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**

- 4.37 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>24</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>25</sup>

- 4.38 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.
- 4.39 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

- 4.40 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.
- 4.41 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.
- 4.42 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.
- 4.43 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.

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<sup>24</sup> <https://www.gov.uk/guidance/build-to-rent>: 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>25</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%.

- 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

- 4.44 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.
- 4.45 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>26</sup>
- 4.46 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**

- 4.47 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.
- 4.48 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).
- 4.49 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 Rent / Affordable Rent wherever possible, taking into account the circumstances of the relevant proposal.

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<sup>26</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.

- 4.50 The requirement for affordable housing in policy H2 applies to specialist accommodation schemes that provide self-contained residential units. The Council will consider the circumstances of each application, for example, whether C2 accommodation provides self-contained accommodation such as extra-care units. Where this is the case the affordable housing requirement in Local Plan policy H2 will apply, and should be provided on-site, unless an offsite or financial contribution is justified in line with the approach set out in Section 6 of this guidance.
- 4.51 For schemes that do not provide self-contained accommodation, such as C2 care homes providing bedrooms only with a high level of care, an affordable housing requirement will not apply. Schemes providing a mix of self-contained and non self-contained accommodation will be considered on a case-by-case basis, with affordable housing requirements only being applied to the self-contained residential component.
- 4.52 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**

- 4.53 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.
- 4.54 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 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**

- 4.55 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.
- 4.56 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.

4.57 In line with national policy, these sites should be adjacent to existing settlements, proportionate in size to them<sup>27</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.

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<sup>27</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**

- 5.1 This section explains how applicants should address affordable housing through the planning application process, including the information to submit, early engagement with the Council, and the role of section 106 planning obligations. It also covers engagement with Registered Providers, the use of grant funding, and how the Council will approach requests to vary affordable housing obligations or apply Vacant Building Credit.

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

- 5.2 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.
- 5.3 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.
- 5.4 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 of, or prior to, the permission being issued.

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

- 5.5 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.
- 5.6 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.
- 5.7 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>28</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 design, mix, accessibility and management of the affordable homes prior to any contractual commitment.

- 5.8 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.
- 5.9 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.
- 5.10 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.
- 5.11 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).<sup>29</sup>
  - Whether the homes have been completed or are due for completion by 1 December 2027, after which under government policy schemes will revert to the tenure mix in the original S106 agreement.<sup>30</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

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<sup>28</sup> This should include requirements set out by the G15 group of large housing associations, available here: <https://g15.london/wp-content/uploads/2025/04/S106-Guidance-Building-together-Building-better.pdf>

<sup>29</sup> These circumstances do not arise from a lack of viability but relate to the respective demand from RPs for different affordable housing products which meet housing need and their eligibility for grant funding. The potential for this and for terms to be agreed between the RP and developer on this basis should be explored, reflecting that affordable housing should be provided on-site except for in genuinely exceptional circumstances.

<sup>30</sup> Completion is defined as when a home is ready for occupation or when a completion certificate is issued. <https://www.gov.uk/government/publications/policy-statement-a-roadmap-for-section-106-delivery-in-england/policy-statement-a-roadmap-for-section-106-delivery-in-england>

suitable RP or the Council, and will consider whether this reflected the market value of the relevant homes at the time of the bid.

- 5.12 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 to not be feasible, a financial contribution should be made in lieu of on-site affordable housing in line with the approach set out in this SPD below.

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

- 5.13 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.
- 5.14 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.
- 5.15 The Council will carefully scrutinise applications to revisit fundamental issues of viability or planning obligations, including Section 73 applications.<sup>31</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**

- 5.16 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.
- 5.17 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

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<sup>31</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.

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.

- 5.18 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.
- 5.19 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 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.
- 5.20 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.
- 5.21 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.
- 5.22 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.
- 5.23 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 This section sets out when the Council may exceptionally accept off-site provision or a financial contribution instead of on-site affordable housing, and the evidence applicants must provide to justify that approach. It explains how contributions will be calculated, collected and spent, with the aim of ensuring that any off-site solution remains equivalent to the affordable housing that would otherwise have been delivered.

6.2 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.

6.3 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.

6.4 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.

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

### **When Off-Site Provision or a Financial Contribution may be Acceptable**

6.6 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.

6.7 Off-site affordable housing provision (i.e. on an alternative site) will only be accepted where proportionate and robust evidence demonstrates there are practical difficulties with providing affordable housing on-site that cannot reasonably be overcome.

6.8 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.

6.9 Guidance on engagement with RPs is set out in Section 5 of 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.

- 6.10 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.
- 6.11 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.
- 6.12 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.
- 6.13 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.
- 6.14 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**

- 6.15 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.
- 6.16 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.
- 6.17 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.

- 6.18 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>32</sup>

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

- 6.19 Components A to C 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.
- 6.20 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.
- 6.21 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.
- 6.22 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.

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<sup>32</sup> This should be calculated by dividing the total GDV of the market tenure homes by the net floorspace of the same homes.

<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.

- 6.23 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 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**

- 6.24 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.
- 6.25 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.
- 6.26 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.
- 6.27 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.
- 6.28 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 This section explains when a Financial Viability Assessment may be required and how it should be prepared, assessed and interpreted. 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.
- 7.2 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.
- 7.3 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.

### **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 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>34</sup>

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<sup>34</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 the 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 its 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. They 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. 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 commercial 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 Cost Plans should set out separate costs for:
- Preliminaries.
  - Demolition/site clearance/site preparation.
  - Base build costs.
  - Abnormal costs.
  - On-site 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.
- 7.49 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

- 7.50 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")

- 7.51 Applicants and landowners should take account of relevant planning obligations and CIL likely to be payable in respect of the scheme.
- 7.52 Planning obligations should be determined in accordance with the Development Plan and related guidance. These should be secured in the S106 Agreement.
- 7.53 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

- 7.54 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.
- 7.55 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.
- 7.56 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

- 7.57 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.
- 7.58 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.
- 7.59 The level of return required for affordable housing should reflect significantly lower levels of risk when compared to market tenure residential units.
- 7.60 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 of 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.
- 7.61 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

- 7.62 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.

- 7.63 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.
- 7.64 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.
- 7.65 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.
- 7.66 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.
- 7.67 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.
- 7.68 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.
- 7.69 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.
- 7.70 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.

- 7.71 If an applicant proposes to use the refurbishment of existing buildings as a basis for establishing BLV, this should generally 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.
- 7.72 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**

- 7.73 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.
- 7.74 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.
- 7.75 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.
- 7.76 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.
- 7.77 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 This section explains how Viability Review Mechanisms will be used to capture improvements in scheme viability over time and secure additional affordable housing where possible. It sets out the principles, trigger points and formulas for Early, Late and Mid-Stage Reviews, and explains how review outcomes should be secured through legal agreements.
- 8.2 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.
- 8.3 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**

- 8.4 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.
- 8.5 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.
- 8.6 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.
- 8.7 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.
- 8.8 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.

- 8.9 The Council, at its 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.
- 8.10 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.
- 8.11 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.
- 8.12 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**

- 8.13 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.
- 8.14 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.

- 8.15 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.
- 8.16 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.
- 8.17 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**

- 8.18 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.
- 8.19 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.
- 8.20 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.
- 8.21 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.
- 8.22 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**

- 8.23 Mid-Stage Reviews should apply to longer phased schemes where a policy compliant level of affordable housing is not achieved.
- 8.24 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.
- 8.25 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 or more 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.
- 8.26 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.
- 8.27 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**

- 8.28 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 stage development value figure includes, and the review-stage development value definition references, 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 mirrors 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 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

- 8.29 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)

- 8.30 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.
- 8.31 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.
- 8.32 Where component P is lower than zero, which arises where the GDV reduces between application and review stages, it should equate to zero.
- 8.33 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

- 8.34 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)\***

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

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

$$Y = ((D * F) \div (A - C))$$

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

- 8.35 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.
- 8.36 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.
- 8.37 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

- 8.38 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)

- 8.39 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.
- 8.40 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.
- 8.41 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.
- 8.42 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

- 8.43 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

- 8.44 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.
- 8.45 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**

- 8.46 This formula identifies whether a contribution is payable to the Council through a Mid-Stage Viability Review. It identifies a surplus available for additional on-site 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.
- 8.47 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)

8.48 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.

8.49 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.

- 8.50 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.

- 8.51 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**

- 8.52 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.
- 8.53 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.
- 8.54 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.
- 8.55 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.
- 8.56 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	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 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. The Council also uses LHA rates to determine maximum housing costs for Affordable Rent to ensure that it remains affordable.
Alternative Use Value	The value of land for uses other than its existing use.
Benchmark Land Value	The value against which a development proposal is typically assessed for viability. It is an allowance for land in an assessment of viability.
Brownfield	Previously developed land that has been built on before and may be suitable for redevelopment.
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.
Council Housing Register	A waiting list maintained by local authorities of individuals or households eligible for affordable housing.
Disabled Facilities Grant Programme	A government-funded grant provided by local authorities to help pay for adaptations to homes to enable disabled people to live independently.
Existing Use Value	The value of land in its existing use, with no expectation of that use changing in the foreseeable future.
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.
Golden Rules	Policy requirements applied to major housing developments on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application. They seek to secure enhanced public benefits such as affordable housing, necessary infrastructure, and accessible green space.
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 of the NPPF. '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.
Green Belt	A land designation to prevent urban sprawl by keeping land around urban areas open.
Greenfield	Land that has not been previously developed, often agricultural or natural land.
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 Social Rent or Affordable Rented 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 80% of the market rent for an equivalent property. The Council also uses LHA rates as a benchmark to help ensure that Intermediate Rent remains affordable. 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 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 Social Rent / Affordable 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>35</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

<sup>35</sup> Spelthorne Key Worker Housing Policy.

	Mayor of London and a development corporation, to the extent appropriate to their responsibilities.
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 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.
Section 73 Application	A planning application made to vary or remove conditions attached to an existing planning permission.
Section 106 Agreement	A legal agreement under Section 106 of the Town and Country Planning Act 1990 used to secure planning obligations.
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	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.
Standard Method	The government's formula used to calculate local housing need.
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).
Use Class C2	Residential institutions (e.g. care homes)
Use Class C3	Dwellinghouses (e.g., houses/flats)
Use Class C4	Small Houses in Multiple Occupation (3–6 occupants)
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>36</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

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<sup>36</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.

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 £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 = 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>37</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.

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<sup>37</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.

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

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

plus

Shared Ownership:  $25\% \times \text{£}3,750 = \text{£}938$

equals

$\text{£}2,288 = \text{Component B}$

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 3,200.

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

An additional CIL liability of  $\text{£}750,000$  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  $\text{£}217,000$ .

Component X - The financial contribution (the formula applied)

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

## 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:

Table 9	Scheme	Policy Compliant	Shortfall
<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:

Formula 1: Early Stage Review	

<b>X = ((A – B) – (C – D)) – P</b>	<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>	
<b>X = ((D * E) ÷ (A – B))</b>	<b>117</b>
<b>Y = Additional Intermediate Rent housing requirement (square metres)</b>	
<b>Y = ((D * F) ÷ (A – C))</b>	<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
D = Surplus return available for additional affordable housing (as determined in Formula 1 (Early Stage Review) or Formula 5 (Mid-Stage Review) (£)	£625,000
E = Percentage of surplus return available for additional affordable housing to be used for Social Rent housing (per cent)	75%
F = 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 = Developer return on change in GDV (£)	£843,750
Y = 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.

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# **Spelthorne Borough Council**

## **Affordable Housing Supplementary Planning Document**

**Town & Country Planning (Local Planning)  
(England) Regulations 2012 (As Amended)**

**Regulation 12 Statement of Consultation  
June 2026**



## **Purpose of this Statement**

1. This Statement of Consultation has been prepared in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). It sets out:
  - The persons and organisations consulted in the preparation of the Affordable Housing Supplementary Planning Document (“SPD”).
  - The methods of consultation undertaken.
  - A summary of the main issues raised during consultation; and
  - How those issues have been taken into account in finalising the SPD.

## **Consultation Undertaken**

2. Consultation was undertaken between the 8<sup>th</sup> of May and the 5<sup>th</sup> of June 2026.
3. Notification of the consultation was sent via email on the 8<sup>th</sup> of May. It was issued to a mailing list held by the Council’s Strategic Planning Team. The mailing list comprised various individuals and organisations, including:
  - General consultation bodies identified in the Council’s Statement of Community Involvement (“SCI”), including voluntary bodies active in the local area, Neighbourhood Forums, and organisations representing the interests of different racial, ethnic or national groups, different religious groups, disabled persons, and persons carrying out business in the area.
  - Specific consultation bodies identified in the Council’s SCI. These include utility companies, government agencies, regional and local authorities and parish Councils.
  - Other prescribed bodies and stakeholders with an interest in planning policy matters within Spelthorne.
  - Organisations and individuals who have expressed an interest in receiving notifications relating to strategic planning matters in Spelthorne.
4. The draft SPD and supporting consultation materials were published on the Council’s website. The consultation was also hosted on the Council’s online engagement hub on Commonplace, which included an online survey to enable interested parties to submit representations.
5. Other ways for all stakeholders to respond to the consultation were made available, including by email to the designated Strategic Planning inbox [planning.policy@spelthorne.co.uk](mailto:planning.policy@spelthorne.co.uk), or alternatively by post to Strategic Planning, Council Offices, Knowle Green, Staines-upon-Thames, TW18 1XB.

6. The consultation was publicised through the Council’s social media posts, including Facebook, Instagram, LinkedIn and X.
7. Hard copies of the consultation documents were made available in the Council’s main office and in the Borough’s libraries.
8. Two consultation events were held, as follows:
  - In-person: This took place on Thursday the 21st of May 2026 between 6pm and 8pm at the Spelthorne Jobs and Skills Hub, Elmsleigh Shopping Centre, Friends Walk, Staines, TW18 4PG.
  - Online: This took place on the 27th of May 2026 between 6pm and 8pm.

### **Main Issues Raised in the Consultation and the Council’s Response**

9. In total, 19 representations were received from the public, including residents, local groups, statutory consultees and other interested external organisations, to this consultation. Internal comments from other departments within the Council were also received.
10. The table below identifies key issues raised in the consultation and sets out the Council’s responses to the issues and the changes made to the SPD to address them:

<b>Table 1: Key Issues Raised and Changes to SPD</b>	
<b>Key Issue</b>	<b>Changes to SPD</b>
A number of respondents raised that the document is complex and that the Council should consider measures to make the document easier to understand for non-experts.	<p>The document is, in places, necessarily technical to ensure accuracy and clarity in addressing the subject matter.</p> <p>A number of changes have been made to the SPD to ensure it is as easy to understand as possible whilst remaining effective. This has included adding to the Glossary and adding introductory paragraphs to each chapter.</p> <p>A further thorough review of the wording has taken place, and a number of wording changes have been applied to remove duplication and ensure the wording of the SPD is as clear as possible.</p>
Responses identified current viability and deliverability issues and the need for flexibility and pragmatism.	The SPD has retained a paragraph in the Introduction which acknowledges current viability and deliverability challenges which has been updated to refer to the Council’s commitment to apply the SPD positively and pragmatically.

<b>Table 1: Key Issues Raised and Changes to SPD</b>	
<b>Key Issue</b>	<b>Changes to SPD</b>
Responses have articulated that the SPD should clarify that affordable housing policy requirements should not apply to C2 Use Class uses that do not propose self-contained units, such as nursing and care homes.	Two new paragraphs are included in the SPD to clarify that the requirement for affordable housing in Local Plan policy H2 applies to specialist accommodation schemes that provide self-contained residential units, and that for schemes that do not provide self-contained accommodation, such as C2 care homes providing bedrooms only with a high level of care, an affordable housing requirement will not apply.
Responses identified that the SPD could benefit from additional data on Spelthorne.	We have added data on the population of Spelthorne and housing delivery in recent years.
Several responses stated that the SPD should address building design such as height or architectural heritage.	Building design largely falls outside the remit of this SPD. This is covered in the new Local Plan and in particular in the new Spelthorne Design Code which was adopted in March 2026.  The Design Code is available online <sup>1</sup> .

11. The table below provides further detail on the responses received, sets out the Council's responses to the representations, and confirms the extent to which the SPD was amended to reflect them:

<sup>1</sup> [www.spelthorne.gov.uk/page/1351/spelthorne-design-code](http://www.spelthorne.gov.uk/page/1351/spelthorne-design-code)

<b>Table 2: Detailed Summary of Consultation Responses, Council Responses and SPD Amendments</b>			
<b>Representor</b>	<b>Summary of Representation</b>	<b>Council's Response</b>	<b>Amend SPD?</b>
Private Individual	<p>Response provided via online survey.</p> <p>The response stated that the SPD provides useful guidance to support the delivery of affordable housing in Spelthorne, and supported the approaches set out in the SPD.</p>	Noted	No change necessary.
Gresham Road Residents Association	<p>Response provided via online survey.</p> <p>The response suggests that additional statistics could be added including total residents in Spelthorne, the number of residents in affordable housing and the number of residents who need affordable housing.</p> <p>It supports the mixing of affordable and market tenure homes to create a more balanced community, and considers that the mix of 1-bed homes for individuals, couples and families is fair and balanced.</p> <p>It requests a clearer explanation of the difference between</p>	<p>A number of changes have been made in relation to the comments provided.</p> <p>With respect to the comment on Shared Ownership homes helping younger people build pride and achievement through home ownership, the SPD still supports the delivery of Shared Ownership housing and encourages that where it is delivered, it should be in the form of one or two bed units which are generally more suitable for young people.</p> <p>In relation to the monitoring and enforcement of the provisions of the SPD, these exercises will be carried out by local officers in the Planning Department. Planning Obligations will be secured in a standardised</p>	<p>Yes.</p> <p>Chapter 3 has been updated to include the population of Spelthorne and also the proportion of housing stock that is social rented.</p> <p>Definitions of "Green Belt" and "Brownfield" have been added to the Glossary to assist with understanding the difference between brownfield, greenfield, and grey belt sites.</p> <p>Paragraphs summarising the content of the chapters have been added at the beginning of Chapters 3 to 8.</p>

Table 2: Detailed Summary of Consultation Responses, Council Responses and SPD Amendments

Representor	Summary of Representation	Council's Response	Amend SPD?
	<p>brownfield, greenfield, and grey belt sites.</p> <p>It supports the preference for Intermediate Rent homes but also values Shared Ownership as a way to help younger people build pride and achievement through home ownership.</p> <p>It supports provision for people with disabilities to live independently and happily.</p> <p>It raises concerns on monitoring and enforcing the matters set out.</p> <p>It is broadly supportive of the approach to financial contributions in lieu of on-site affordable housing, although raises caps, monthly payments and the need for finite timescales.</p> <p>It advises an external audit with respect to the viability assessment process.</p> <p>It is supportive of the Glossary.</p>	<p>way within a Section 106 Agreement which will assist with monitoring and enforcement.</p> <p>With respect to financial contributions in lieu of on-site affordable housing and caps, monthly payments and the need for finite timescales, these are typically paid upfront in a single payment with the amount defined in a legal agreement.</p> <p>In relation to external auditing of the viability assessment process, these assessments are carried out by independent professionals who have an obligation to be objective.</p>	

Table 2: Detailed Summary of Consultation Responses, Council Responses and SPD Amendments

Representor	Summary of Representation	Council's Response	Amend SPD?
	<p>It concludes that the guidance is detailed and well thought out, albeit complex. Advises that a simple paragraph is added at the start of each chapter to explain its content.</p>		
Private Individual	<p>Response provided via online survey.</p> <ul style="list-style-type: none"> <li>- It stated that the SPD provides useful guidance to support the delivery of affordable housing in Spelthorne, and supported the approaches set out in the SPD.</li> <li>- The response raised concerns in relation to the costs associated with maintenance and service charges for homes in tall buildings, and whether these buildings can achieve mixed communities.</li> <li>- In relation to viability review mechanisms, the response described that the</li> </ul>	<p>The delivery of tall buildings in Spelthorne falls outside of the scope of the SPD. Tall buildings are covered in the new Local Plan and in the Design Code which were adopted in March 2026.</p> <p>In relation to service charges, the SPD considers these in the context of Affordable Rent and Intermediate Rent properties. Service charges need to be taken into account when determining rents in line with the affordability criteria for these affordable tenures in the SPD.</p> <p>In relation to maintenance costs, the SPD requires developers to engage with Registered Providers of Affordable Housing early in the design process – this will help ensure that new affordable housing meets the needs of Registered</p>	<p>Yes</p> <p>A paragraph has been added at the start of the review mechanisms chapter to provide an overarching explanation of these and what the chapter covers.</p>

Table 2: Detailed Summary of Consultation Responses, Council Responses and SPD Amendments

Representor	Summary of Representation	Council's Response	Amend SPD?
	provisions were overly technical.	Providers and tenants, including in respect of maintenance costs.  The recently adopted Local Plan addresses how mixed and balanced communities can be achieved.	
Community Campaigner	<p>Response submitted via online survey.</p> <p>The representation states that traditional architecture design codes should be embedded within the SPD, as they perform strongly on economic, ecological and environmental grounds.</p> <p>It calls for stronger protection of historic buildings, including a ban on demolishing pre-1950 buildings, support for restoring and reconstructing historic structures, and protection for non-designated heritage assets.</p> <p>It states that using authentic traditional design codes would help meet housing needs while reducing environmental harm,</p>	<p>Building design and related heritage considerations largely fall outside the remit of this SPD. This is covered in the new Local Plan and in particular in the new Spelthorne Design Code which was adopted in March 2026.</p> <p>The Design Code is available online<sup>2</sup>.</p>	No change.

<sup>2</sup> <https://www.spelthorne.gov.uk/page/1351/spelthorne-design-code>

<b>Table 2: Detailed Summary of Consultation Responses, Council Responses and SPD Amendments</b>			
<b>Representor</b>	<b>Summary of Representation</b>	<b>Council's Response</b>	<b>Amend SPD?</b>
	supporting biodiversity, and strengthening Spelthorne's economic resilience.		
Private Individual	<p>Response submitted via online survey.</p> <p>The response raised financial management as a factor, although it did not identify specific circumstances.</p> <p>The response raised that the Viability Assessment and Viability Review Mechanisms Chapters are complex and would be easier to understand if they were simplified.</p> <p>The response referenced the Foundry House scheme in Elmsleigh Road and described that planning applications should be simplified.</p>	<p>The purpose of the SPD is to provide guidance to support the Local Plan. It is not able to consider wider Council administration matters.</p> <p>The Viability Assessment and the Viability Review Mechanisms Chapters have been further reviewed to consider the extent to which they are able to be understood.</p>	<p>Yes.</p> <p>Paragraphs summarising the content of the chapters have been added at the beginning of Chapters 3 to 8.</p> <p>Minor wording changes have been applied in several areas to ensure the wording of the SPD is as clear as possible.</p> <p>A number of changes have been made to the SPD to ensure it is as easy to understand as possible whilst remaining effective. This has included adding introductory paragraphs to each chapter and adding to the Glossary.</p> <p>A further thorough review of the wording has taken place, and a number of wording changes have been applied to remove duplication and ensure the wording of the SPD is as clear as possible.</p>
Staines Town Society	Response submitted via online survey.	Noted.	No change.

<b>Table 2: Detailed Summary of Consultation Responses, Council Responses and SPD Amendments</b>			
<b>Representor</b>	<b>Summary of Representation</b>	<b>Council's Response</b>	<b>Amend SPD?</b>
	<p>The response generally stated that the SPD provides useful guidance to support the delivery of affordable housing in Spelthorne.</p> <p>The response supported that the preferred/priority affordable housing products identified in the SPD were the most affordable ones.</p>		
Private Individual	<p>Response submitted via online survey.</p> <p>Every response was that they partially supported the SPD. No qualitative explanation was provided.</p>	Noted.	No change.
Local Councillor Greg Neall	<p>Response submitted via online survey.</p> <p>The response was supportive of the approaches in the SPD.</p> <p>It stated that it may be useful for the SPD to include historical rates of housing development in the borough.</p>	Noted.	<p>Yes.</p> <p>Information on housing delivery has been included in Chapter 3 of the SPD.</p>

<b>Table 2: Detailed Summary of Consultation Responses, Council Responses and SPD Amendments</b>			
<b>Representor</b>	<b>Summary of Representation</b>	<b>Council's Response</b>	<b>Amend SPD?</b>
Local Councillor Laura Barker	<p>Response submitted via online survey.</p> <p>The response states that the SPD provides developers and residents with clarity on what will be expected from new development and will help ensure that appropriate housing is built in our communities.</p> <p>It states that the summary is not necessarily effective and that the document could include a conclusion.</p>	<p>Noted.</p> <p>Regarding the inclusion of a conclusion, one has not been added as conclusions are not typically included in similar technical guidance documents.</p>	<p>Yes.</p> <p>Additions have been made to the Executive Summary to ensure it identifies key guidance contained in the SPD.</p>
Private Individual	<p>Response submitted via email.</p> <p>It advises:</p> <ul style="list-style-type: none"> <li>- One addition to the List of Acronyms.</li> <li>- 13 additions to the Glossary.</li> <li>- 14 minor changes to formatting and wording.</li> </ul>	<p>The majority of changes advised have been accommodated in the final version of the SPD.</p>	<p>Yes.</p> <p>A number of minor wording changes were made to paragraphs in Chapters 2, 3, 5, 7 and 8.</p> <p>Footnotes have been amended to include web addresses.</p> <p>Limited changes were made to formulas 1, 2, 3 and 5 within Chapter 8.</p>

Table 2: Detailed Summary of Consultation Responses, Council Responses and SPD Amendments

Representor	Summary of Representation	Council's Response	Amend SPD?
	<ul style="list-style-type: none"> <li>- Five amendments to the formatting of the review mechanism formulas.</li> </ul>		<p>The List of Acronyms and Glossary were updated to include the additions advised.</p> <p>Limited changes were made to formulas 1, 2 and 3 within Appendix B (worked example).</p>
Historic England	<p>Response submitted via email.</p> <p>No comments to make.</p>	Noted.	No change.
National Highways	<p>Response submitted via email.</p> <p>No comments to make.</p>	Noted.	No change.
Elmbridge Borough Council	<p>Response submitted via email.</p> <p>It recognises the value of clear and robust guidance to support the effective delivery of affordable housing.</p> <p>It supports the SPD's aim and its preference for on-site affordable housing but seeks clearer guidance on when off-site provision will be accepted.</p> <p>It states that the SPD should set out when viability review mechanisms will be triggered.</p>	<p>With respect to setting out when review mechanisms will be triggered, the SPD states that:</p> <ul style="list-style-type: none"> <li>- Early stage reviews will 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.</li> <li>- Late Stage Reviews for shorter term schemes should be triggered on occupation of 75 per cent of the homes in the scheme. With respect to longer</li> </ul>	<p>Yes.</p> <p>A new paragraph has been added in Chapter 6 of the SPD to provide clearer guidance on when off-site provision will be accepted.</p>

<b>Table 2: Detailed Summary of Consultation Responses, Council Responses and SPD Amendments</b>			
<b>Representor</b>	<b>Summary of Representation</b>	<b>Council's Response</b>	<b>Amend SPD?</b>
		<p>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 as determined by the Council.</p> <ul style="list-style-type: none"> <li>- Mid-stage reviews will be triggered on a case-by-case basis reflecting phases, plots or reserved matters sequencing.</li> </ul>	
Natural England	<p>Response submitted via email.</p> <p>No comments to make.</p>	Noted.	No change.
Bidwells on behalf of Perseus Land and Development	<p>Response submitted via email.</p> <p>It focuses on how the SPD should apply to development under Use Class C2 and advises that affordable housing requirements should not apply to residential care homes and nursing homes which do not contain self-contained dwellings.</p> <p>It provides a review of the relevant local policy, references Planning Practice Guidance</p>	The issue is noted and has been subject to internal discussion.	<p>Yes.</p> <p>Two new paragraphs have been added in Chapter 4 of the SPD. They clarify that the requirement for affordable housing in Local Plan policy H2 applies to specialist accommodation schemes that provide self-contained residential units, and that for schemes that do not provide self-contained accommodation, such as C2 care homes providing bedrooms only with a high level of care, an affordable housing requirement will not apply.</p>

<b>Table 2: Detailed Summary of Consultation Responses, Council Responses and SPD Amendments</b>			
<b>Representor</b>	<b>Summary of Representation</b>	<b>Council's Response</b>	<b>Amend SPD?</b>
	and provides information on a High Court Judgment.		
Gladman Developments Limited	<p>Response submitted via email.</p> <p>The response raises concerns that the affordable housing thresholds in Policy H2 may be too rigid and could undermine site deliverability.</p> <p>It states that the SPD should include a viability tested justification for the thresholds and other obligations before the adoption of this SPD, ensuring financial viability does not act as a constraint.</p>	<p>Amending affordable housing thresholds is not within the remit of the SPD as these are set out in policy in the new Local Plan which was adopted in March 2026.</p> <p>The Council notes current deliverability pressures which are acknowledged in the Introduction Chapter of the SPD.</p> <p>The SPD sets out a robust viability assessment process which can be used to justify a departure from affordable housing thresholds identified.</p>	Paragraph 1.5 of the Introduction Chapter has been updated to include that the SPD will be applied positively and pragmatically by the Council, given the current viability and deliverability challenges.
Waverley Borough Council	<p>Response submitted via email.</p> <p>It supports the greater provision of clarity regarding affordable housing delivery, tenure expectations, design integration, and viability processes. It states that the SPD is comprehensive and provides useful operational guidance for applicants and decision-makers.</p>	<p>Noted.</p> <p>The Council will continue to be pragmatic and flexible, given current delivery pressures.</p>	No change.

**Table 2: Detailed Summary of Consultation Responses, Council Responses and SPD Amendments**

<b>Representor</b>	<b>Summary of Representation</b>	<b>Council's Response</b>	<b>Amend SPD?</b>
	It encourages continued emphasis on flexibility and deliverability, particularly in the context of current viability pressures affecting residential development.		
Surrey County Council	Response submitted via email. No comments to make.	Noted.	No change.

12. Further to the formal responses received on the SPD, the Council has continued internal engagement on the document, including with Housing and Development Management officers. This has resulted in amendments to the SPD as follows:
- Two new paragraphs have been added to clarify that, with respect to affordable housing requirements for specialist accommodation schemes (e.g. Care/Nursing Homes), a requirement to provide affordable housing does not apply to schemes that are not proposing to provide self-contained accommodation.
  - It does not use the umbrella term “Low Cost Rent” and instead refers to Affordable Rent and Social Rent as distinct affordable tenures.
  - It has been updated to clarify that total housing costs, rather than just the rent, should not exceed the relevant Local Housing Allowance rate and should also not be higher than 80% of market rent.
  - The Table under paragraph 4.2 has been updated to explicitly express that sites allocated in the Local Plan are subject to affordable housing requirements set out within Section 10 of that document. Paragraph 4.4 has also been amended, and a new paragraph 4.5 has been added, to reflect this.

### **Next Steps**

13. The Council has considered all responses received to the consultation and has made a number of corresponding amendments to the Affordable Housing SPD.
14. A final version of the SPD will be presented to a Council Meeting on the 29<sup>th</sup> of June 2026 for adoption.

## Equality Analysis

<b>Directorate:</b> Regeneration & Growth  <b>Service Area:</b> Strategic Planning	<b>Lead Officer:</b> Jane Robinson, Local Plans and Infrastructure Manager  <b>Date completed:</b> June 2026
<b>Service / Function / Policy / Procedure to be assessed:</b>  Affordable Housing Supplementary Planning Document	
<b>Is this:</b> New / Proposed <input type="checkbox"/> Existing/Review <input checked="" 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	✓	
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**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 Leigh Street **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) (2025) and Draft NPPF (2026). 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 and responded to the statutory public consultation, including Surrey County Council, neighbouring authorities, utility providers and community groups. A full consultee list is available from the Strategic Planning Team and the Statement of Consultation has been published showing the responses received and if the SPD was updated as a result.</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 Affordable Housing SPD has been developed using existing evidence sources and underwent statutory public consultation for four weeks, starting from the 8 May 2026 to 5 June 2026. This provided the opportunity for all stakeholders to provide comment. The Statement of Consultation has been published showing the responses received and if the SPD was updated as a result.

**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. The Statement of Consultation has been published showing the responses received and if the SPD was updated as a result.

### 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 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. 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 S 106 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:  Dr S J Muirhead Group Head Commissioning and Transformation	Date: 10 June 2026
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**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:**

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# Spelthorne Borough Council

# Climate Change

## Supplementary Planning Document

May 2026



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# | 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 2024-28 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.

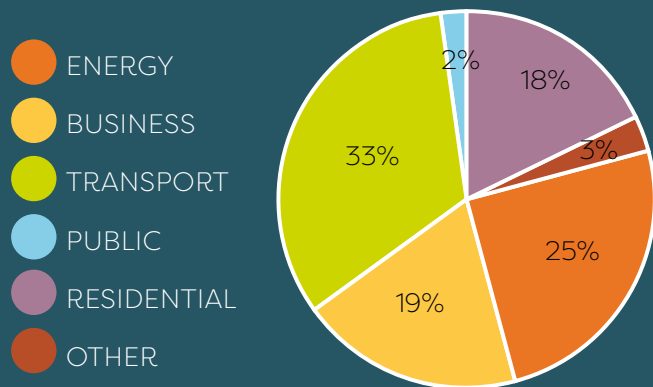


FIGURE 1: UK CARBON EMISSIONS BY SECTOR, 2022 - PROVISIONAL (DEPT FOR ENERGY SECURITY & NET ZERO, OFFICE FOR NATIONAL STATISTICS)

## 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 Local Plan policy PS1 "Responding to the Climate Emergency".

**1.22** The policy states:

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

*(a) Directing development towards locations that minimise the need to travel and maximise the ability to make trips by sustainable modes of transport including cycling, walking and public transport.*

*(b) Delivering an efficient use of land especially on the most accessible sites.*

*(c) Providing more walkable and cyclable neighbourhoods (Twenty Minute Neighbourhoods) that reduce demand for the use of private vehicles.*

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

*(a) Maximising energy efficiency and integrating the use of renewable and zero carbon energy (demonstrated through an energy statement);*

*(b) Optimising the site orientation, building form, layout, landscaping and materials to maximise natural light and heat, whilst avoiding internal overheating by providing passive cooling and ventilation;*

*(c) Incorporate sustainable construction and demolition techniques that provide for the efficient use of minerals including a proportion of recycled or secondary aggregates, and encourage the re-use of construction and demolition waste at source or its separation and collection for recycling;*

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

*(a) Achieve water efficiency of 110 litres per person per day and where feasible provide rainwater harvesting techniques;*

*(b) Where CHP (combined heat and power) distribution networks already exist, new developments are required to connect to them or be connection-ready, unless it can be clearly demonstrated that utilising a different energy supply would be more sustainable or connection is not feasible. The impacts of the CHP plants emissions upon air quality must be assessed in accordance with Policy E4;*

*(c) Incorporate measures for the secure storage of cycles and storage of waste including recyclable waste;*

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

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

*(a) how the energy hierarchy has been applied and how sustainable design and construction practice will be incorporated.*

*(b) applications should be accompanied by Construction Management Plans, which seek to manage the impact of construction traffic on the local and strategic transport networks*





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

**1.23** This SPD was originally prepared to support Spelthorne's previous Core Strategy 2009, and has been updated with relevant references and necessary changes. The core principles and guidance on implementation remain the same, giving applicants certainty even as the underlying policy framework has changed.

**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 \(February 2025\)](#)
-  [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 (>10 dwellings or >1000m<sup>2</sup> floorspace), 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:

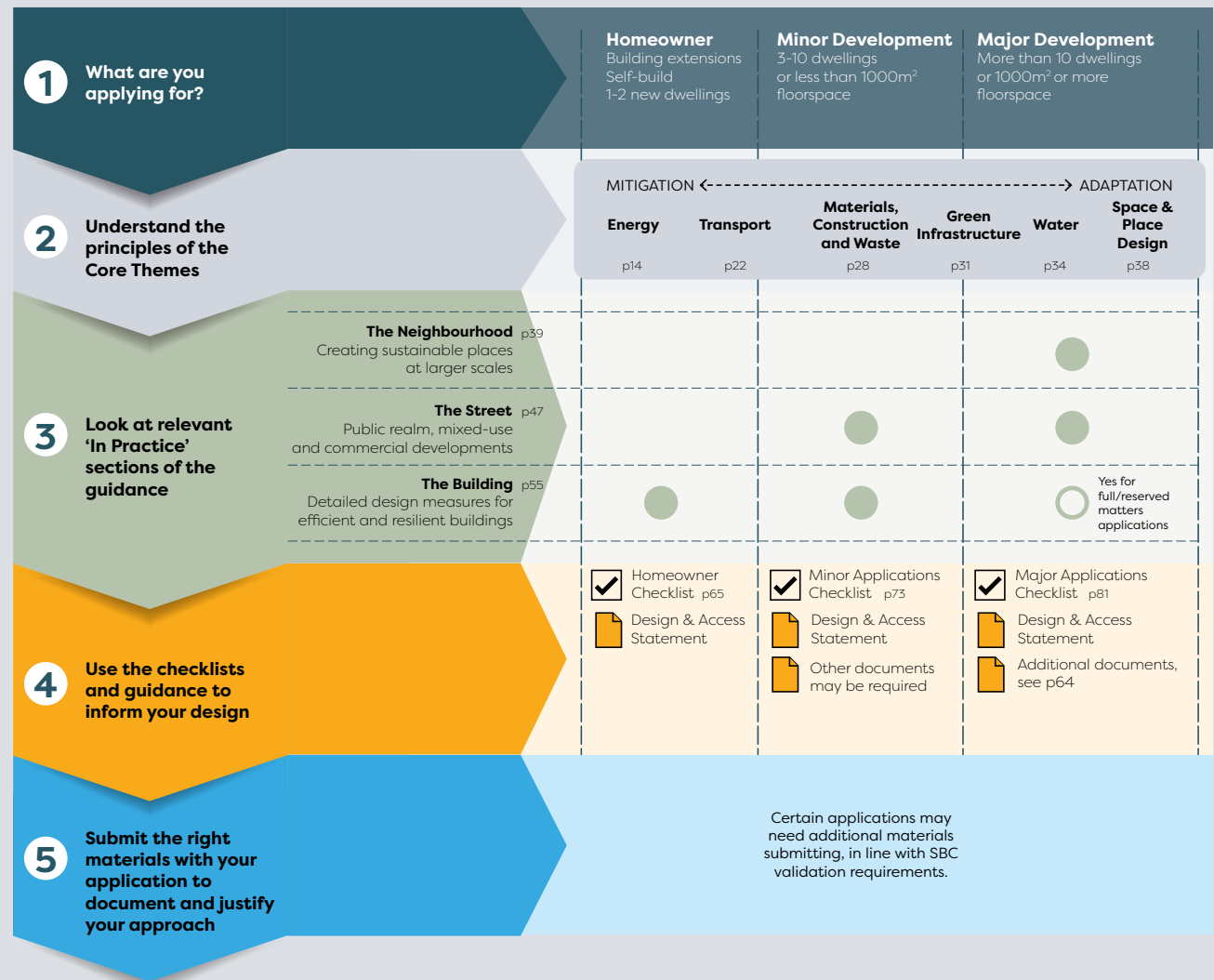
- **Core Themes:** the key principles of design that underpin the six themes of this document: Energy; Transport; Materials, Construction and Waste; Green Infrastructure; Water; and Space and Place Design.
- **In Practice:** demonstration of how the principles can be implemented in practice at a range 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 in Figure 2 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

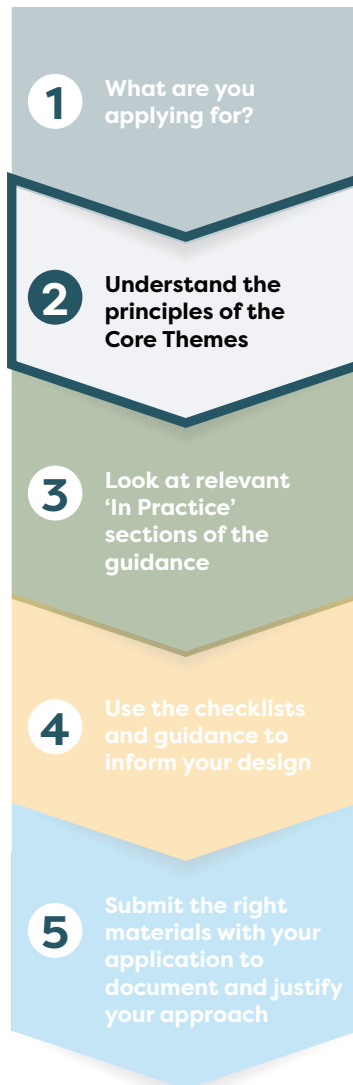


## Key Definitions

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 shown in Figure 3.

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

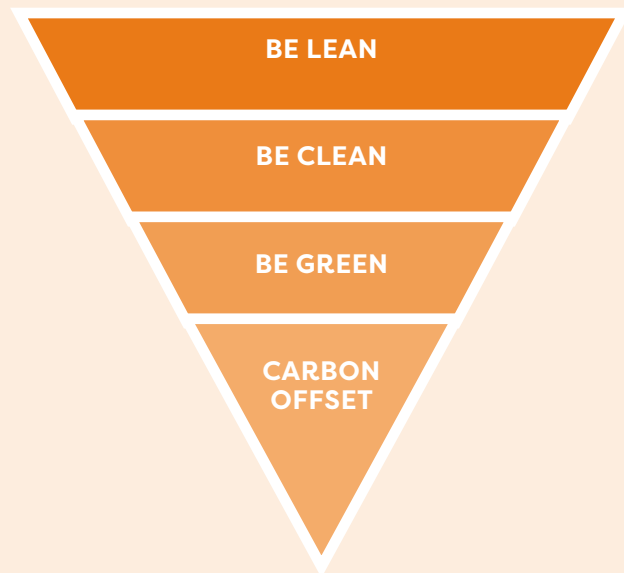


FIGURE 4: ENERGY HIERARCHY

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

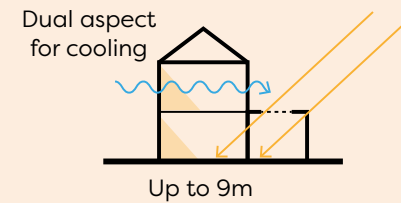
**Be lean: Design buildings to be passively cooled, lit naturally and need minimal heating**

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.

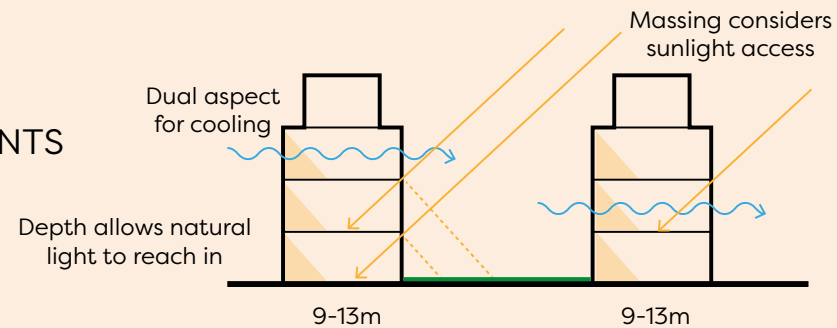
2.14 Key measures include:

- 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

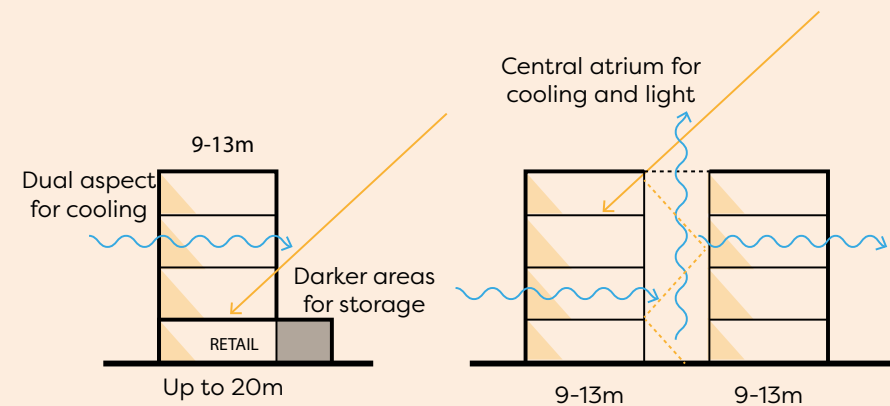


FIGURE 5: DESIGN FOR PASSIVE HEATING AND COOLING FOR DIFFERENT TYPES OF BUILDING

## 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.
- 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.

- 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.



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. Where a district or site-wide heating system is not feasible, heat pumps or other low carbon efficient technology should supply heat.



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.

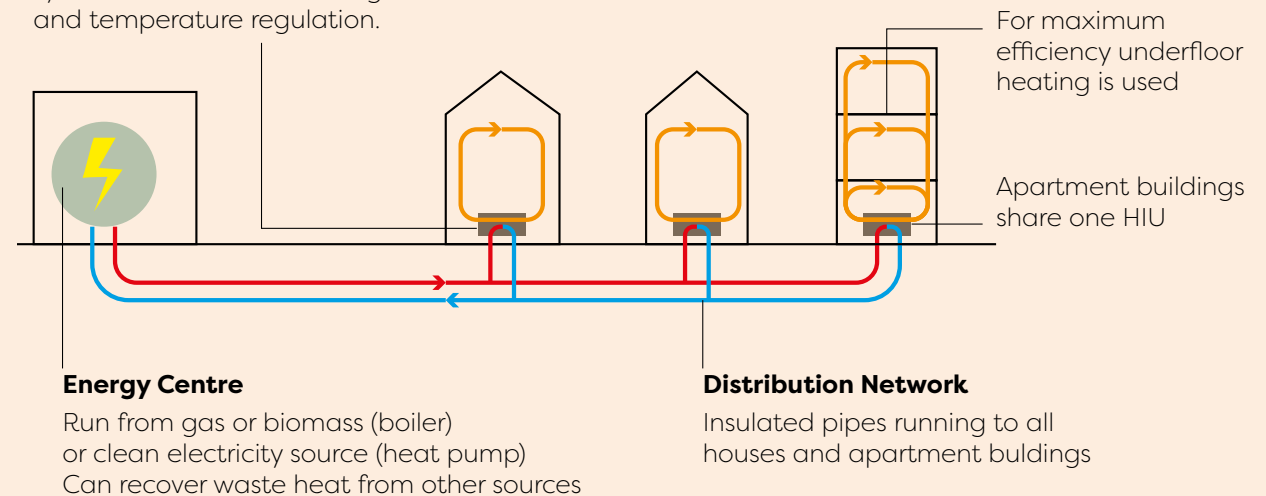


FIGURE 8: HOW HEAT NETWORKS WORK

### **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. Depending on the type of building technology options can include:
- 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 use data and information from smart meters, thermographic surveys and Energy Performance Certification (EPCs) to identify the largest opportunities for improving the energy performance of the buildings and use this to inform design proposals.

**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.

### **Engage with Distribution Network Operators (DNOs) to support low-carbon development**

**2.26** Early engagement with electricity network providers is essential to enabling the transition to low-carbon heating, renewable energy generation, and electric vehicle (EV) infrastructure across Spelthorne.

**2.27** A Distribution Network Operator (DNO) is a licensed company responsible for

owning, operating, and maintaining the local electricity distribution system. DNOs manage the infrastructure that distributes electricity from the National Grid to homes, commercial properties, and industrial sites

**2.28** Effective coordination with the DNO will reduce delays, ensure that developments are designed with sufficient electrical capacity.

**2.29** Within Spelthorne, the relevant DNOs are UK Power Networks (UKPN) and Scottish and Southern Electricity Networks (SSEN). Applicants should consult their online capacity maps and technical guidance when preparing development proposals.

**2.30** The transition to low-carbon technologies significantly increases electrical demand. Developments may require DNO engagement when proposing:








- Heat pumps (air-source or ground-source)
- Electric vehicle charging infrastructure
- Solar PV systems, battery storage or other generation assets

## Energy



- Electrification of industrial or commercial processes
  - Major refurbishments or new-build schemes requiring significant load increases
- 2.31** Developers should engage early with the DNO to determine whether:
- the existing local network has sufficient headroom, or
  - grid reinforcements or connection upgrades are required.
- 2.32** Applicants should prepare the following information prior to submitting a connection or capacity enquiry:
- The building's Meter Point Administration Number (MPAN)
  - Full site address and key contact details
  - Existing connected electrical capacity (kVA)
  - Anticipated future maximum demand (kVA) after installation of low-carbon technologies
  - Site layout plan including boundaries, building locations, and proposed meter locations
  - Details of planned electrical equipment including heat pumps, EV chargers and other large loads
- Details of all on-site generation or storage (existing and proposed)
  - Landlord/owner consent where required
- 2.33** This information should also be summarised in the planning application, typically within the Energy Statement.
- 2.34** Grid upgrade applications can take six months or longer depending on complexity and the level of network reinforcement required. Applicants must account for this in their project planning.
- 2.35** Early DNO engagement is essential to:
- avoid costly or avoidable delays
  - align building design with available capacity
  - optimise the connection point and reduce infrastructure requirements
  - determine feasibility of heat pumps and EV infrastructure from the outset
- 2.36** The Council encourages developers to explore all reasonable alternatives to reduce or shift peak electrical demand prior to requesting increased capacity from the DNO.

### Further Reference

**2.37** 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](#)
-  [NABERS \(Non-Domestic Building\)](#)

### MAJOR APPLICATIONS: DEMONSTRATING SUSTAINABILITY

-  BREEAM Building Certification
-  PassivHaus Certification

## Transport

2.38 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

**2.39** 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.

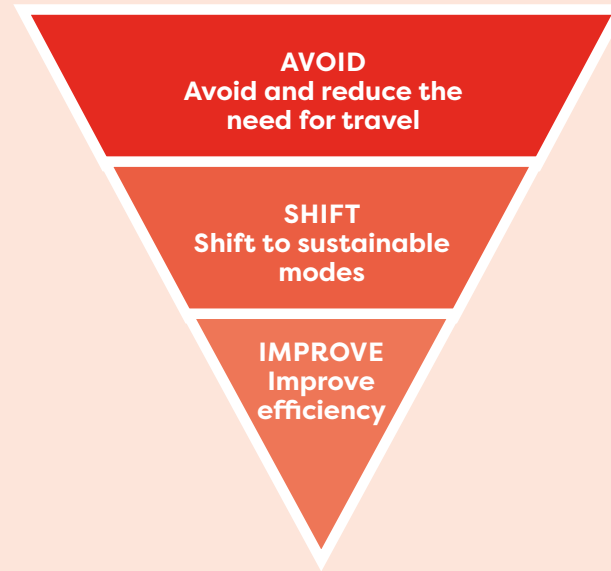


FIGURE 11: HIERARCHY FOR OVERALL APPROACH TO TRAVEL

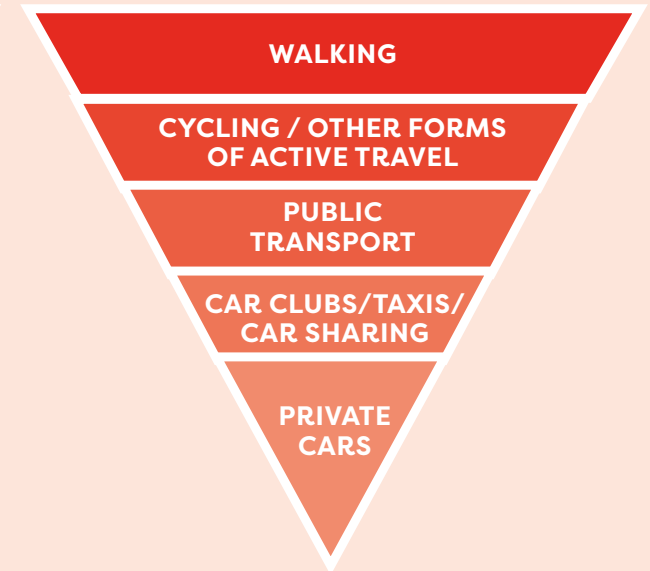
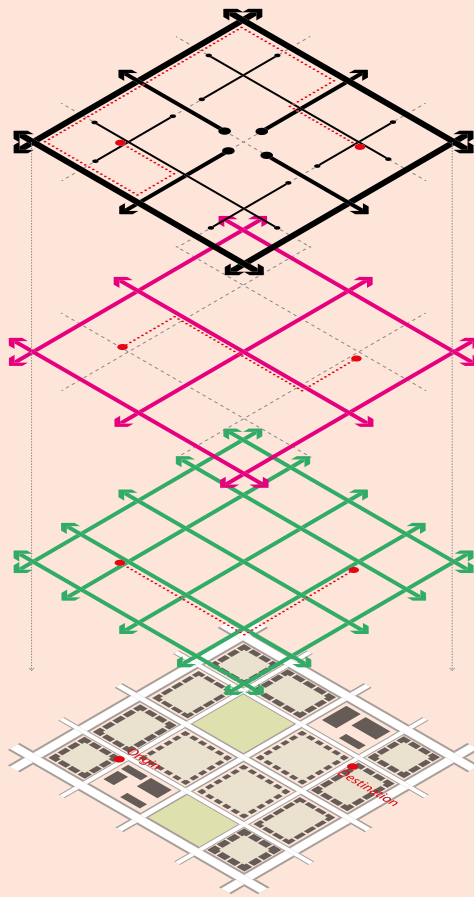


FIGURE 12: DESIGN HIERARCHY FOR MOBILITY

**2.40** 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 in Figures 11 and 12.

**2.41** 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.

## Design for 'filtered permeability' and Liveable Neighbourhoods



Page 148

### 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.

**2.42** 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.

**2.43** 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.

**2.44** 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.

**2.45** 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

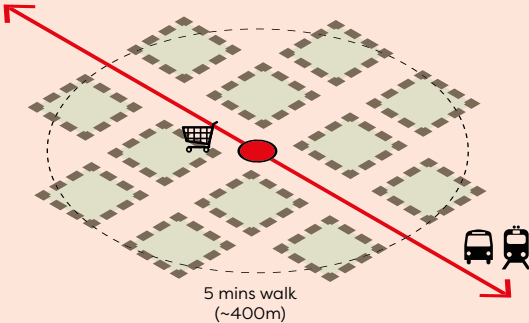
# Transport

## Locate development for sustainable travel choices

2.46 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.

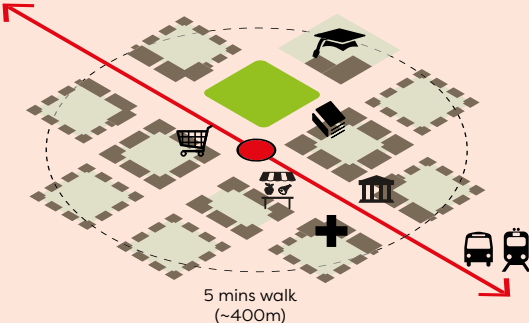
2.47 This means that locations such as town centres, public transport corridors and local centres should have higher densities of development and a greater mix of uses and services than less well-connected areas. This principle is known as 'transit-oriented development'. It means that people in those 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.

2.48 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
- Facilities close to public transport

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

## Transport

### *Provide infrastructure for sustainable transport*



2.49 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.

2.50 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

## Transport



FIGURE 16: DESIGN PRINCIPLES FOR EFFECTIVE SUSTAINABLE TRAVEL MOBILITY HUBS

**2.51** 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

**2.52** 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

**2.53** 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](#)

# Materials, Construction & Waste

2.54 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

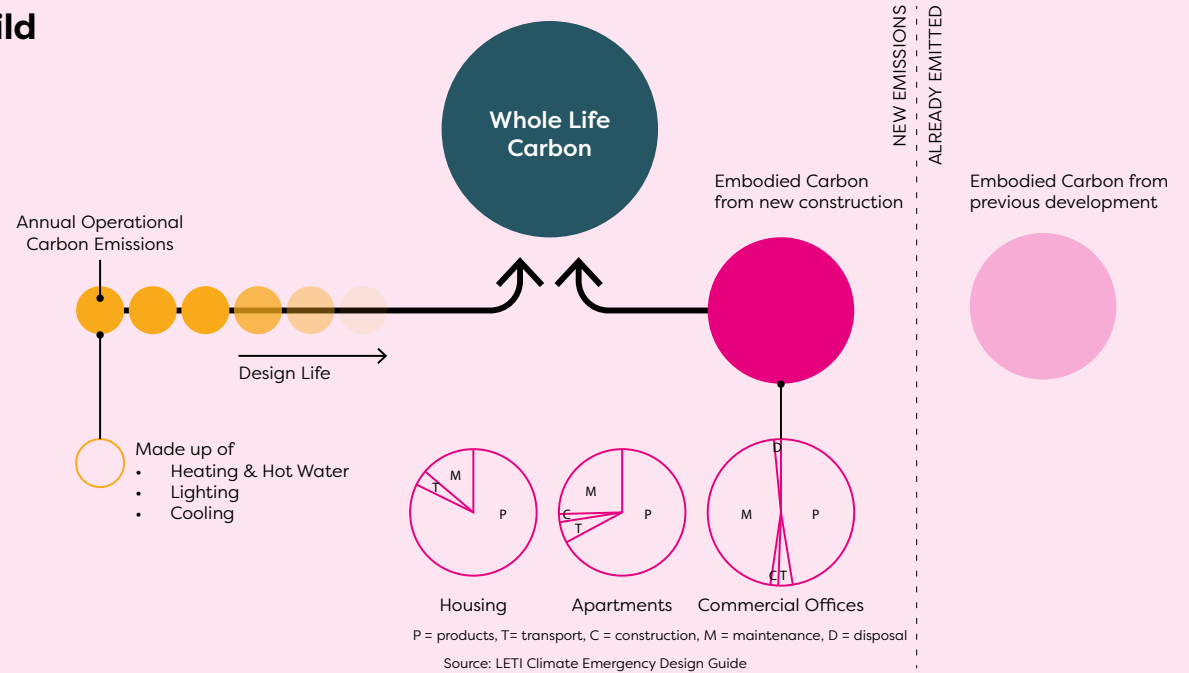


RICS Whole Life Carbon Assessment

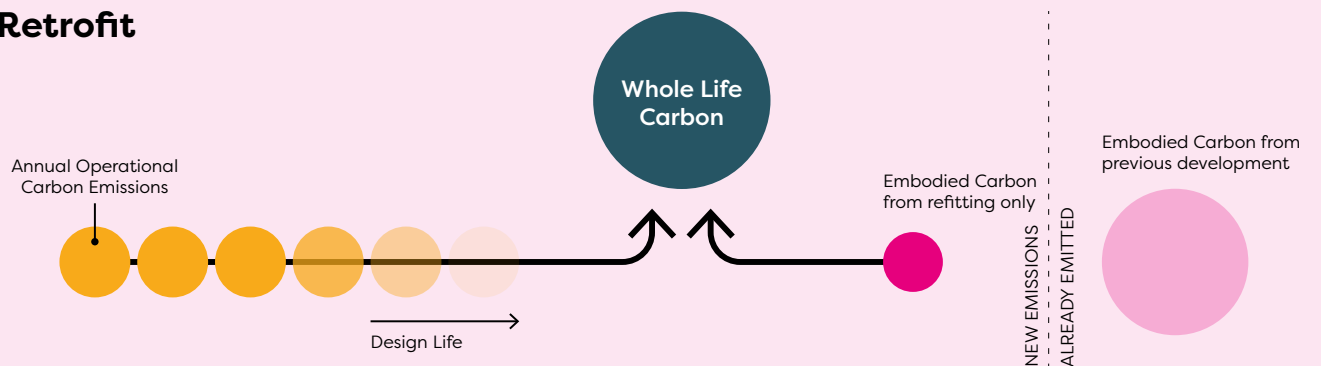
FIGURE 17: WHOLE LIFE CARBON CONSIDERATIONS FOR NEW BUILD AND RETROFIT DEVELOPMENT OPTIONS

## Materials, Construction & Waste

### Undertake a Whole Life Carbon Assessment New Build



### Retrofit



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

## Materials, Construction & Waste

**2.55** ‘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.

**2.56** 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)*

**2.57** 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**

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

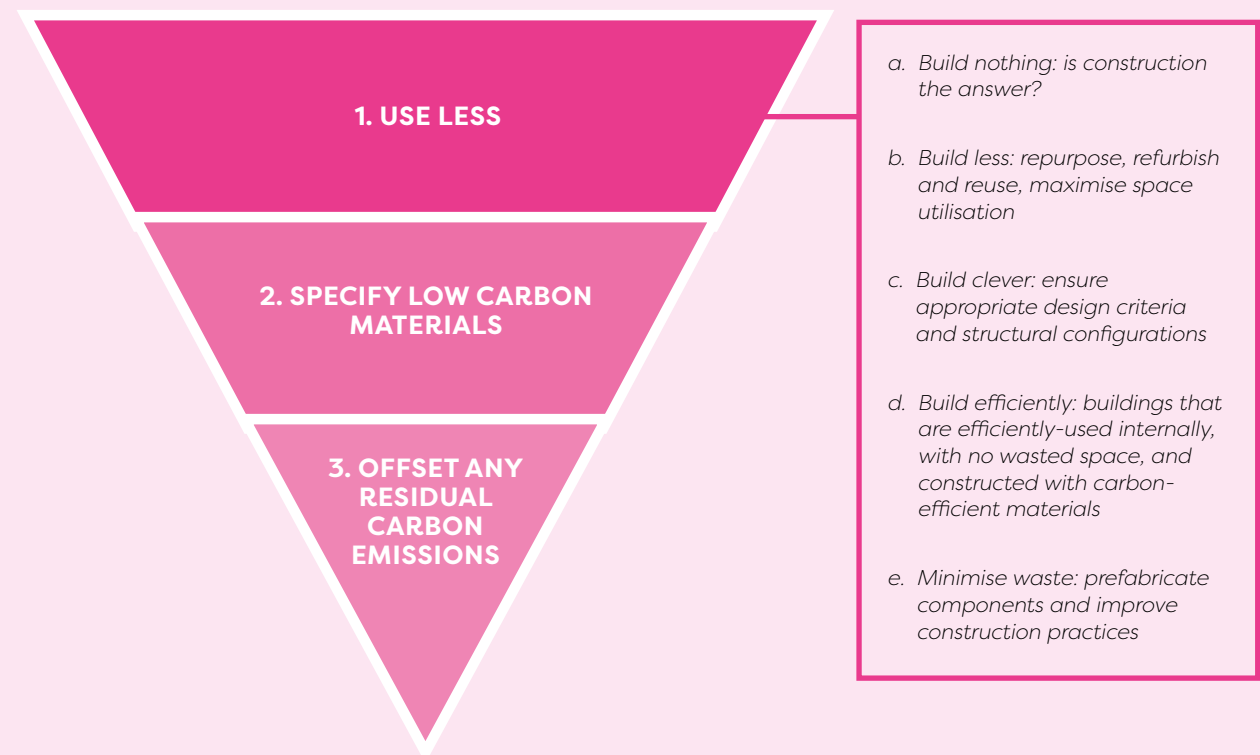


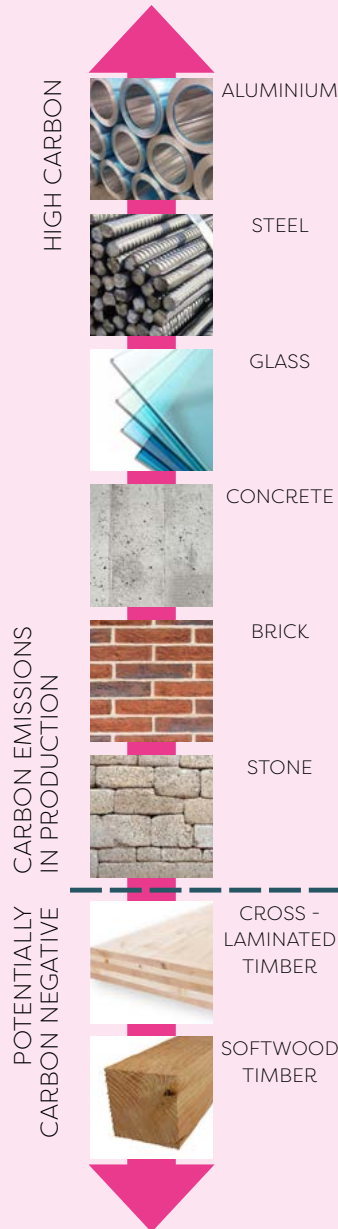
FIGURE 18: CONSTRUCTION HIERARCHY

## Materials, Construction & Waste

### Use low-carbon construction materials

- 2.59** 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.
- 2.60** 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.
- 2.61** 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.
- 2.62** 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.

FIGURE 19: RELATIVE EMBODIED CARBON OF DIFFERENT CONSTRUCTION MATERIALS






### Choose appropriate materials for a changing climate

- 2.63** 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.
- 2.64** 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 34 for more information.

### Further Reference

- 2.65** 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

**2.66** 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**

**2.67** 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.

**2.68** 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.

### ***Ensure biodiversity resilience***

2.69 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

2.70 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)







## Green Infrastructure



## Green Infrastructure

### Further Reference

2.73 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

### Provide green infrastructure throughout built environment

2.71 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

2.72 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)



## Water

**2.74** 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.

**2.75** 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)*

**2.76** 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.

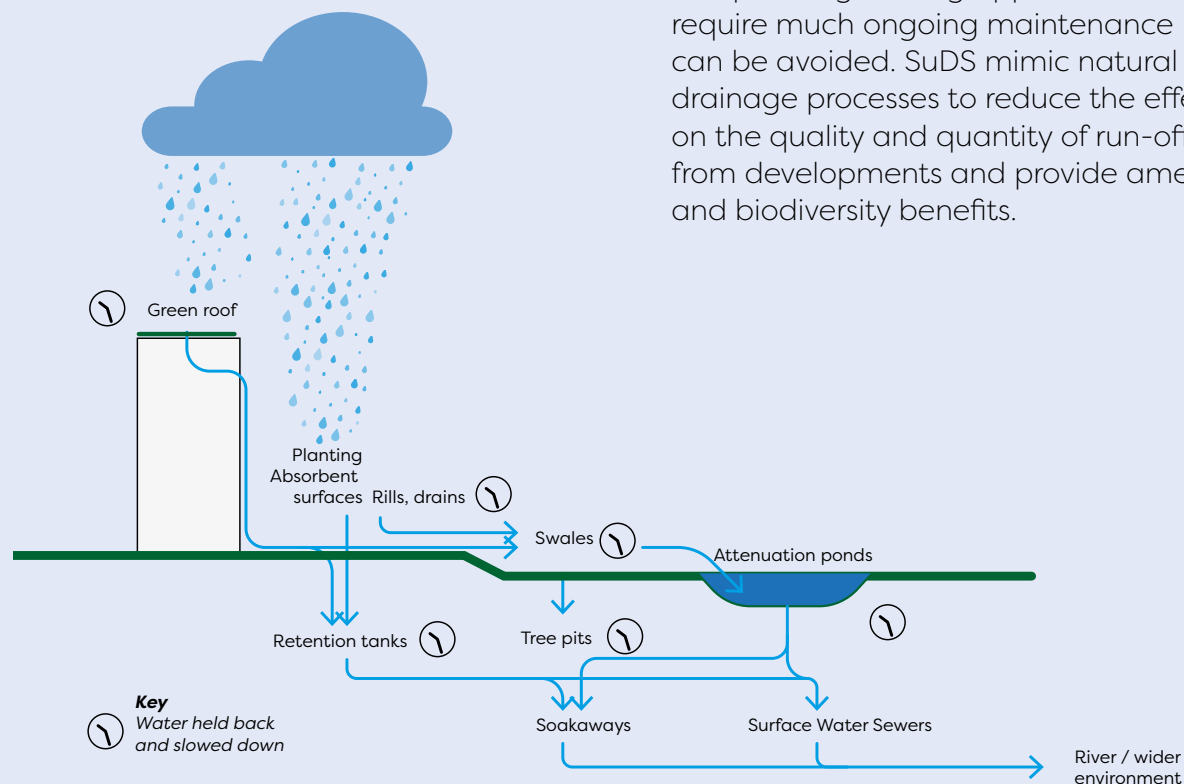


FIGURE 22: PRINCIPLES OF URBAN SUSTAINABLE DRAINAGE SYSTEMS

## Water

2.77 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.

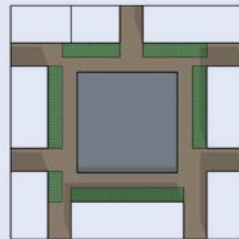
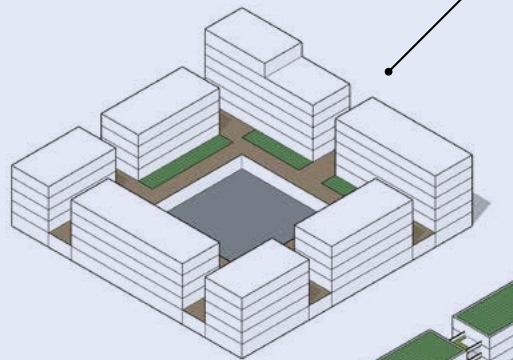


FIGURE 23: EXAMPLES OF SUSTAINABLE DRAINAGE SYSTEMS IN BUILT UP AREAS (TOP ROW: MALMO, SWEDEN; UPTON, NORTHAMPTON, HAMMARBY, SWEDEN) (BOTTOM ROW: CAMBRIDGE; MALMO, SWEDEN; MALMO, SWEDEN; NEWPORT)

## Calculate your Urban Greening Factor

### Low Urban Greening Factor

Mostly impermeable surfaces



### High Urban Greening Factor

- Green roofs
- Green walls
- Street trees, swales and planting
- Rain gardens and water on site
- Permeable paving
- Balconies with planting
- Shared, drained gardens on internal podiums

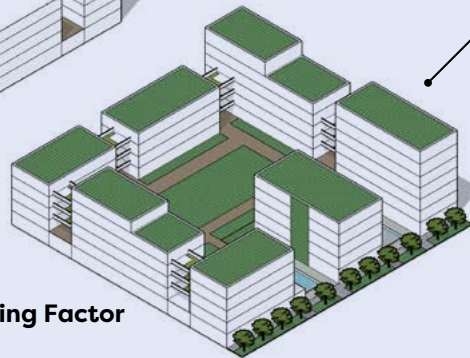


FIGURE 24: APPLYING THE URBAN GREENING FACTOR TO MAKE AN APARTMENT SCHEME MORE PERMEABLE FOR WATER

2.78 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.

2.79 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 and is supported by the Spelthorne Design Code.

## Water

### Be efficient with water



FIGURE 25: HOME RAINWATER CAPTURE SYSTEMS



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

**2.80** 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.

**2.81** 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.






**2.82** 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)



**2.83** 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

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

-  [Ciria: The SuDS Manual](#)
-  [Urban Design Learning: 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

**2.85** 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*

**2.86** 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

**2.87** 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

**2.88** 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.

**2.89** 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 1000m <sup>2</sup> or more 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'*

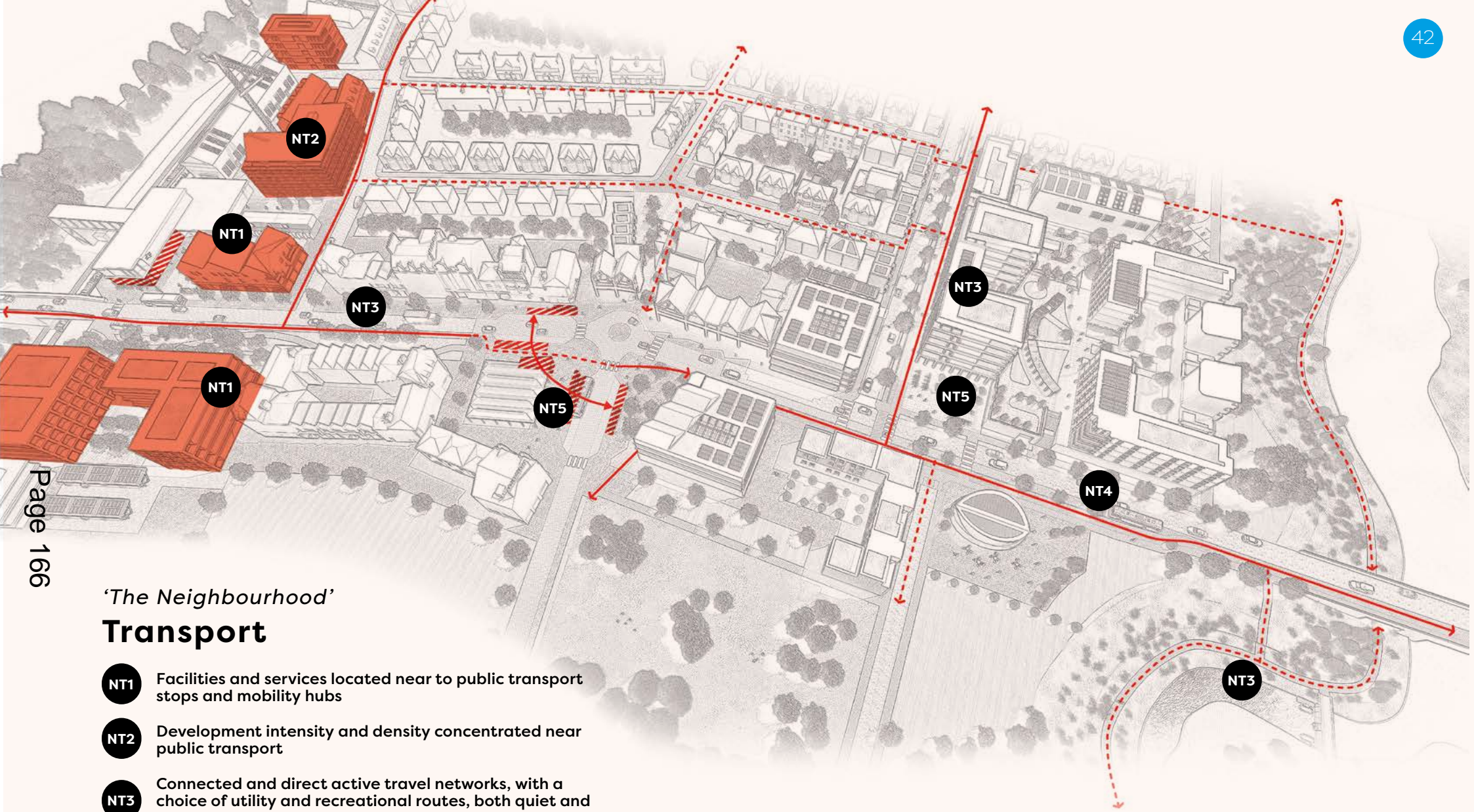
- 1 People can move around safely and conveniently by walking, cycling and other active travel means, making seamless connections to public transport for longer journeys
- 2 Facilities are available locally and concentrated near public transport so they can be accessed widely without needing a car
- 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

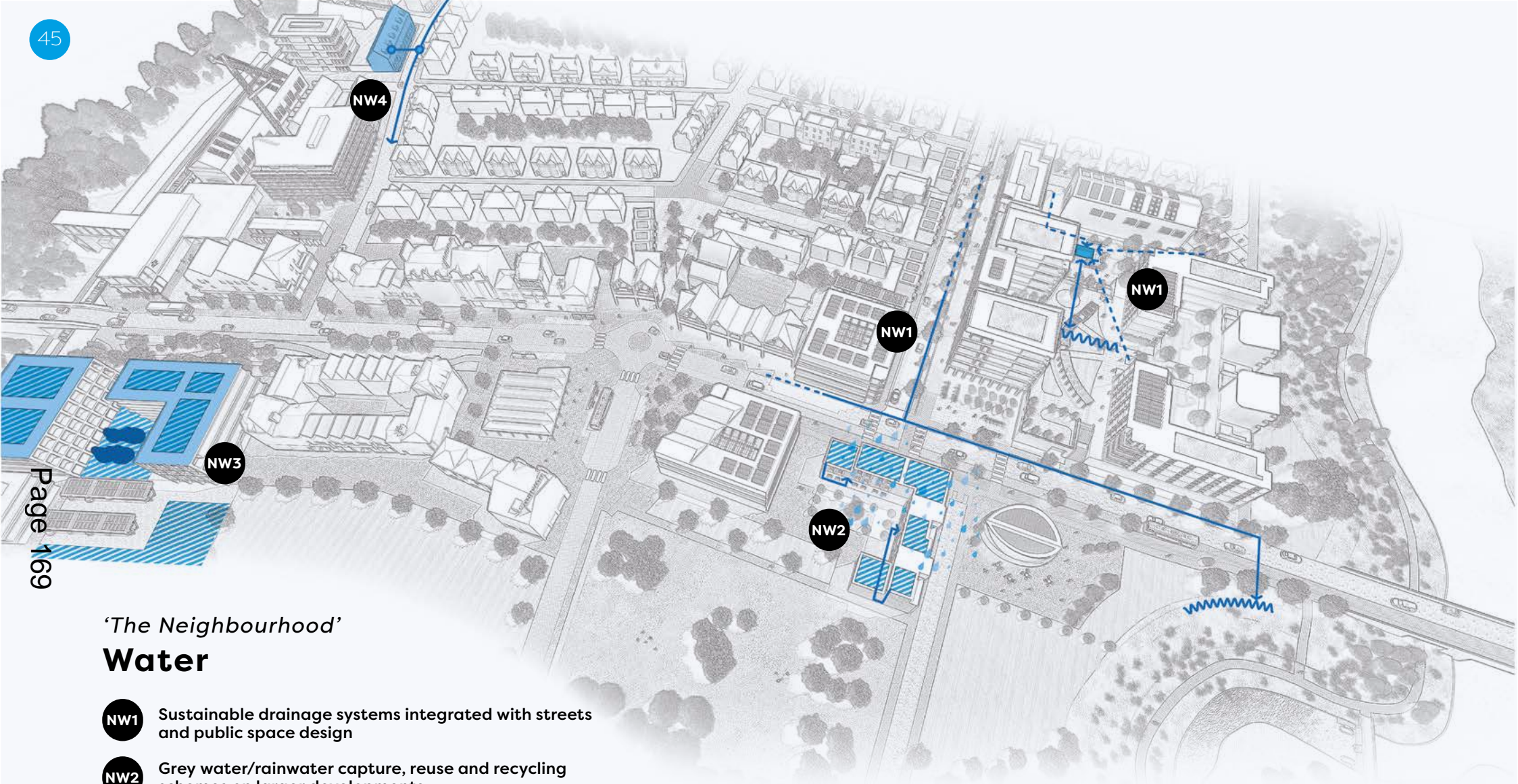
FIGURE 30: THE NEIGHBOURHOOD - MATERIALS, CONSTRUCTION & WASTE



*'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'

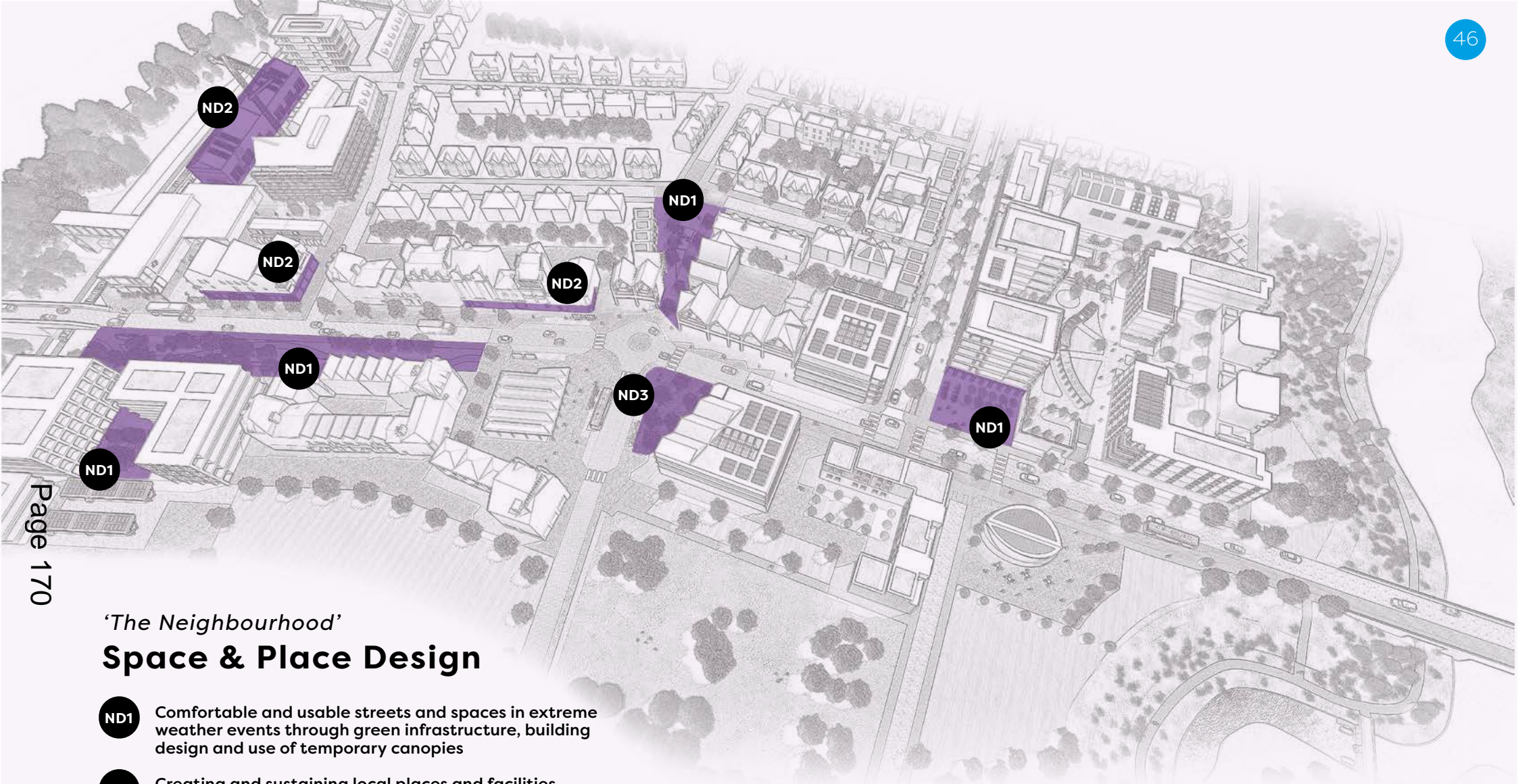
FIGURE 31: THE NEIGHBOURHOOD - GREEN INFRASTRUCTURE



## '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 1000m <sup>2</sup> or more 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 Street'***

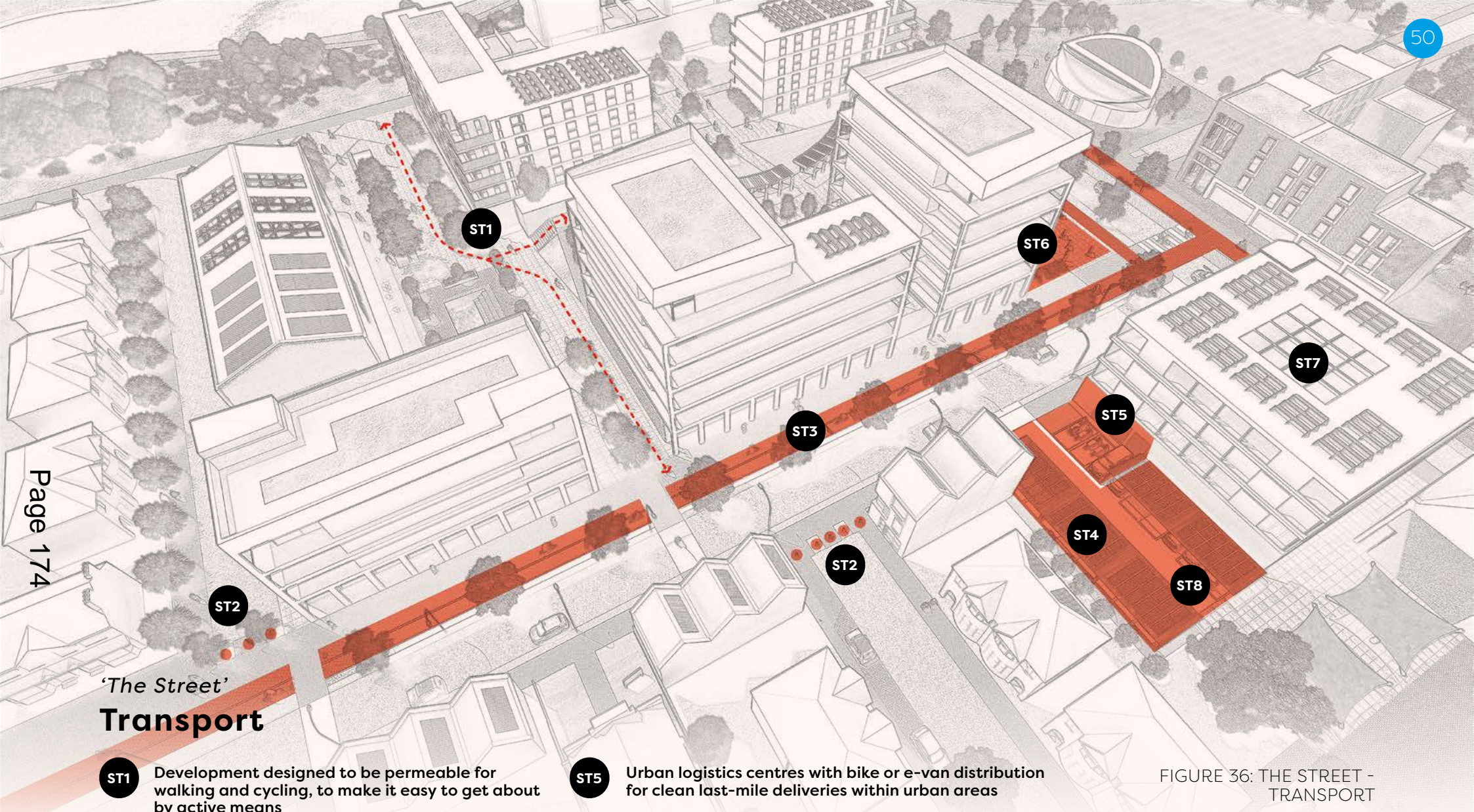
FIGURE 34: THE STREET

- 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**

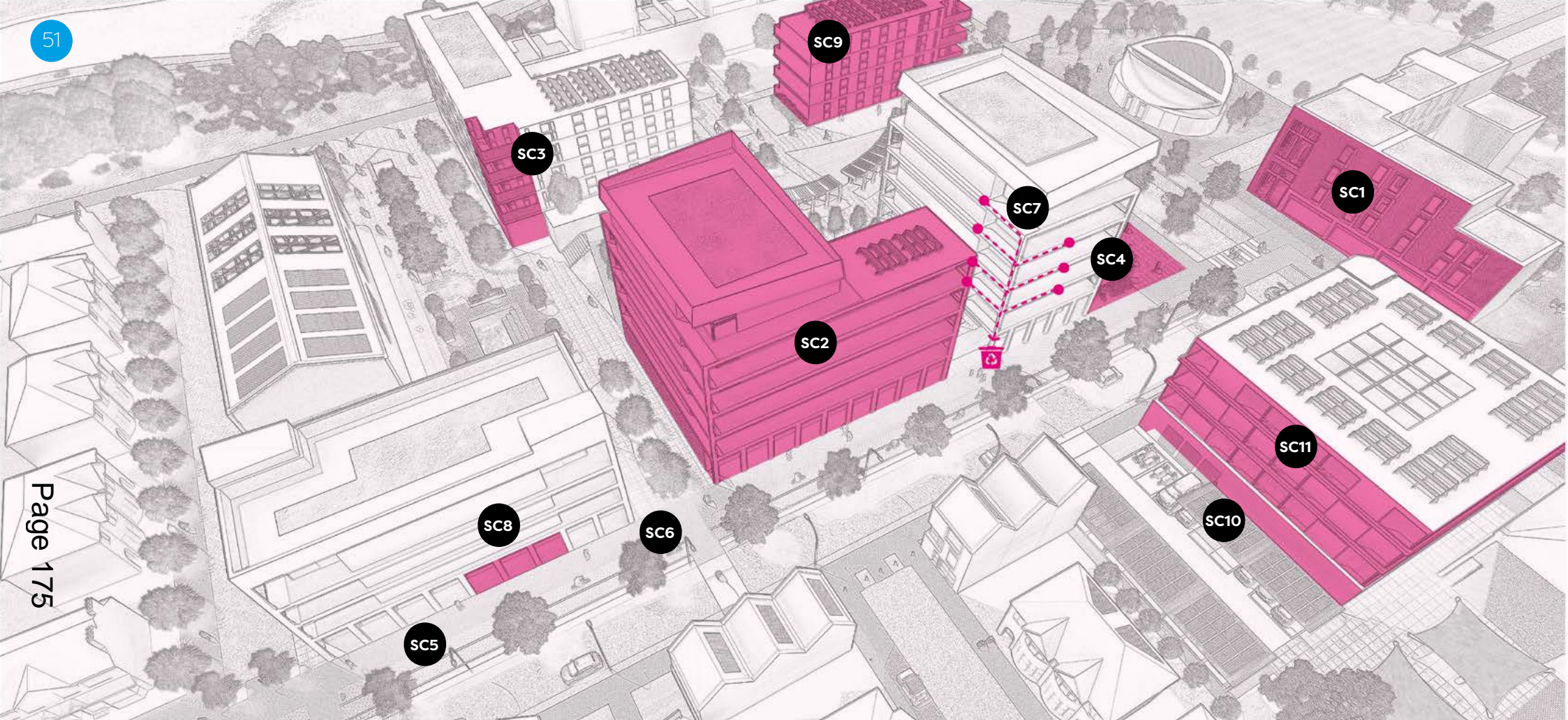
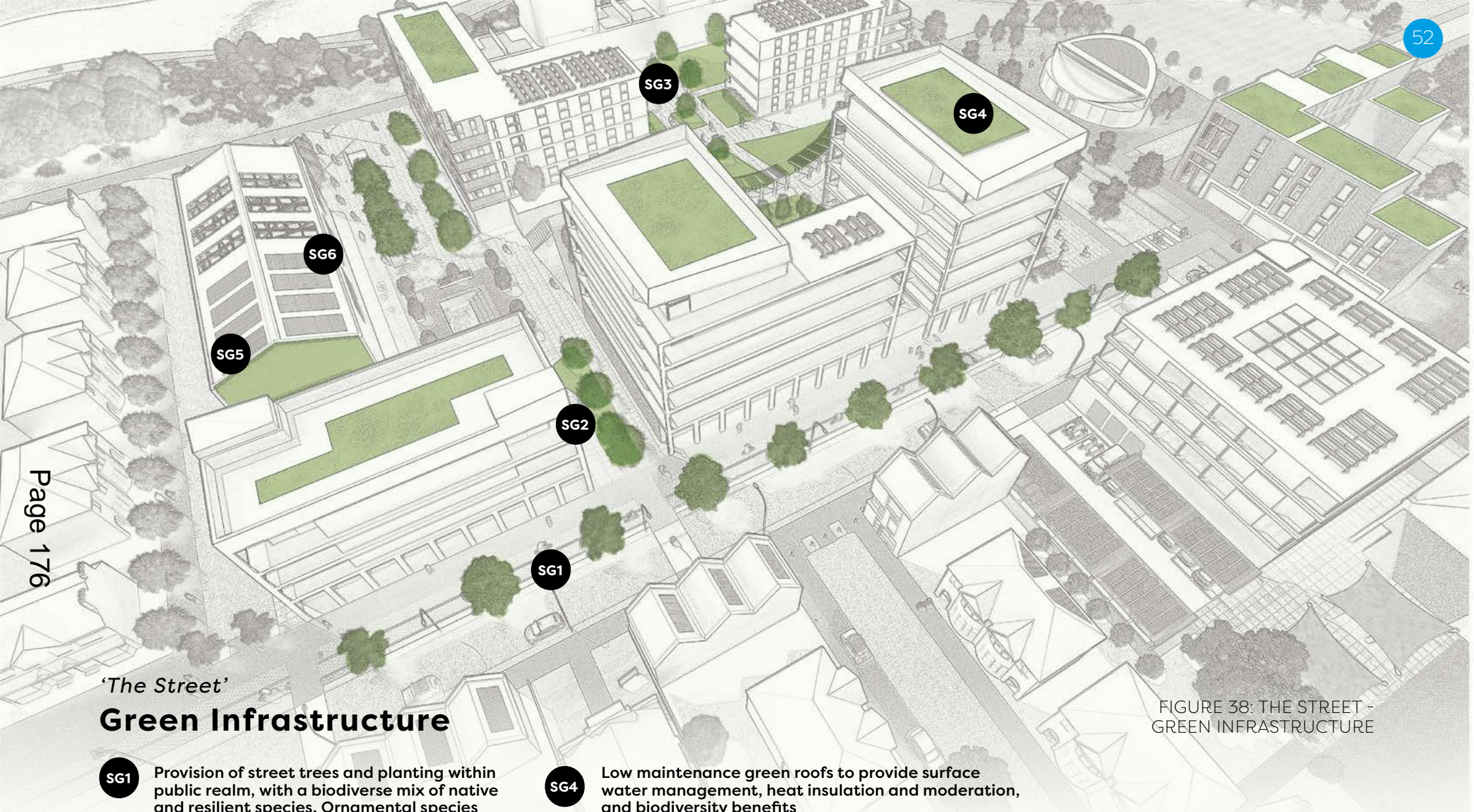
- 
- SC1** Prioritisation of low-carbon and locally sourced materials in design
  - SC2** Balance massing and embodied carbon, recognising that high-rise construction requires use of higher carbon materials and operational emissions. Density can often be achieved more sustainably at lower heights.
  - 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 &amp; 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

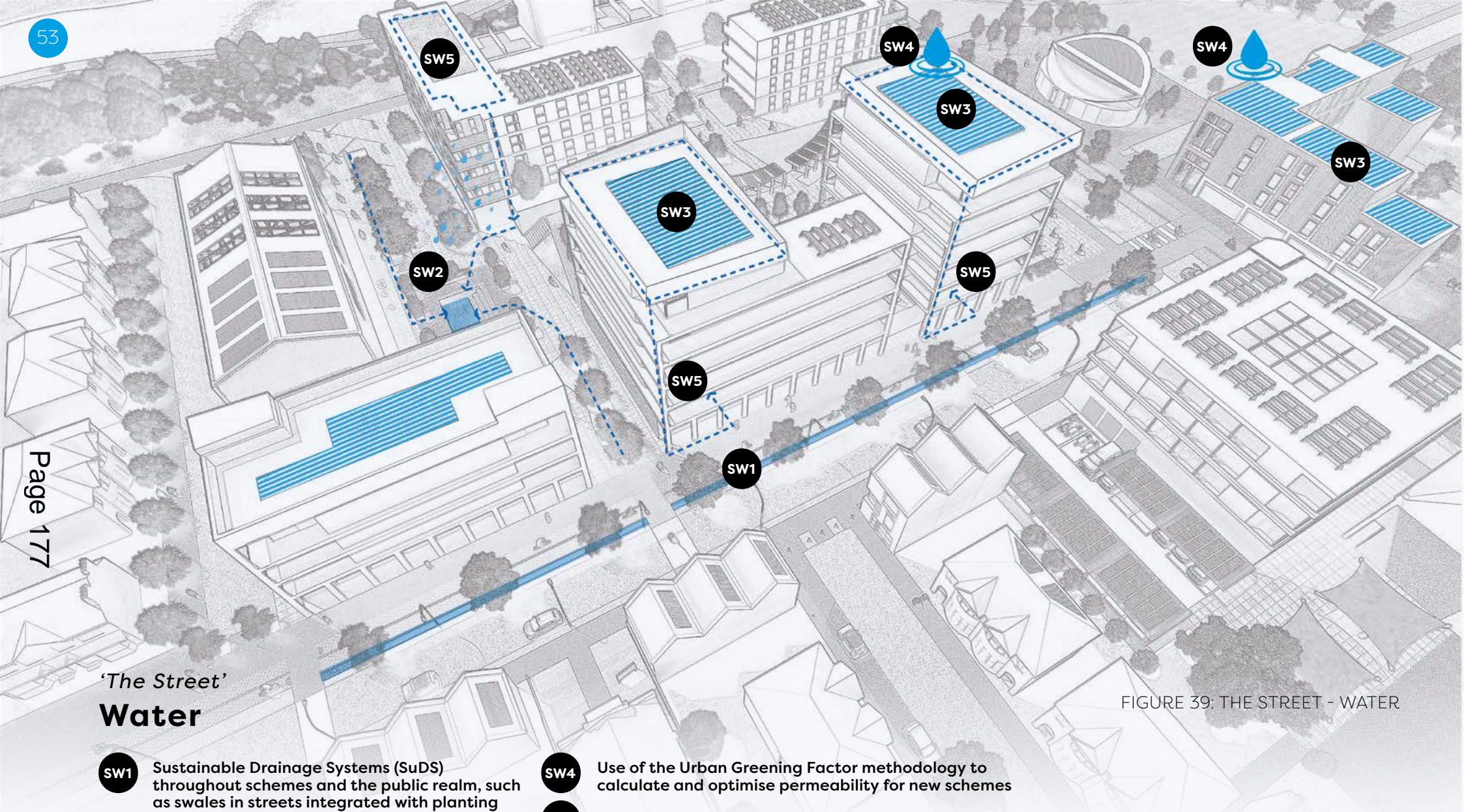
FIGURE 38: THE STREET - GREEN INFRASTRUCTURE

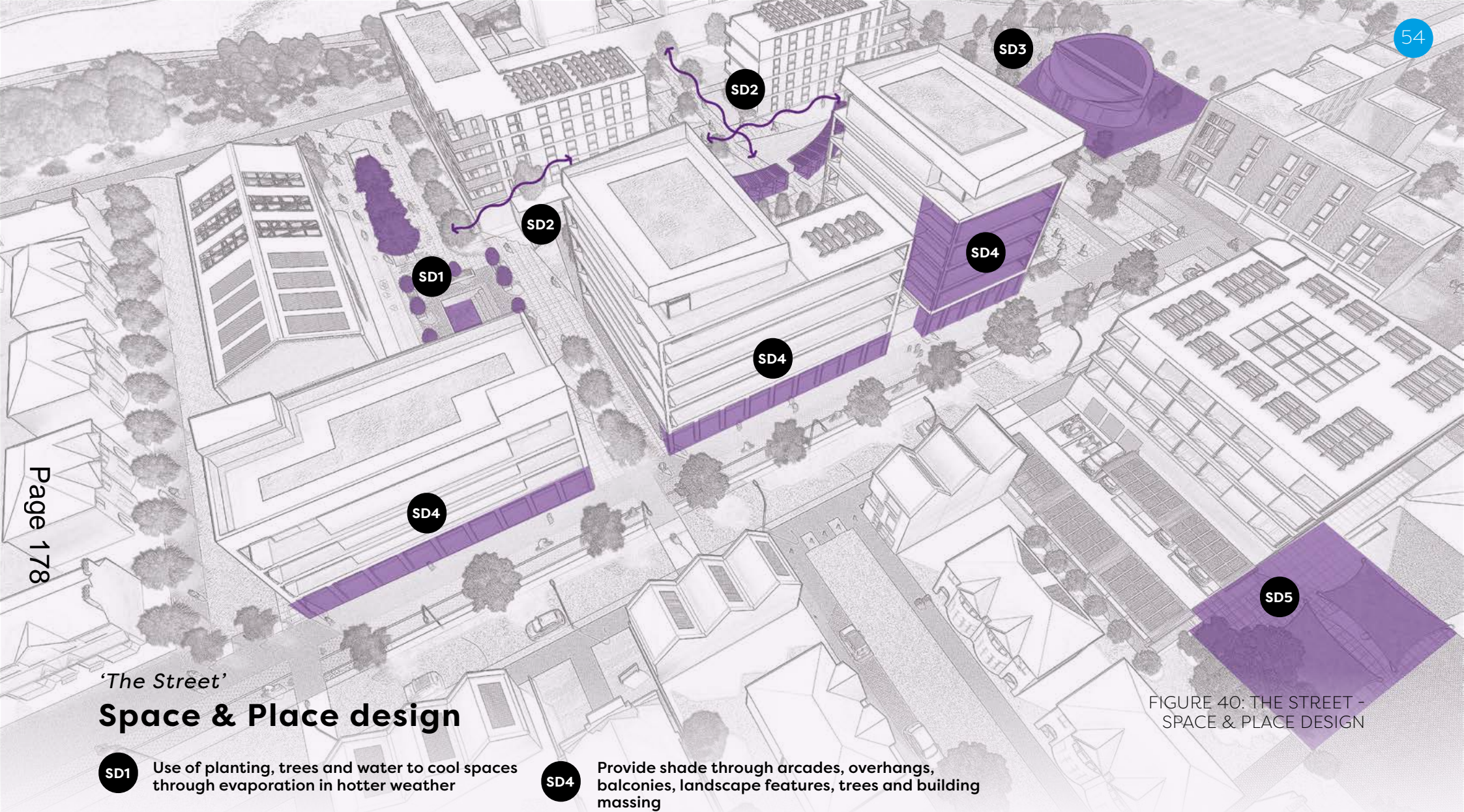
## 'The Street' Water

- 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

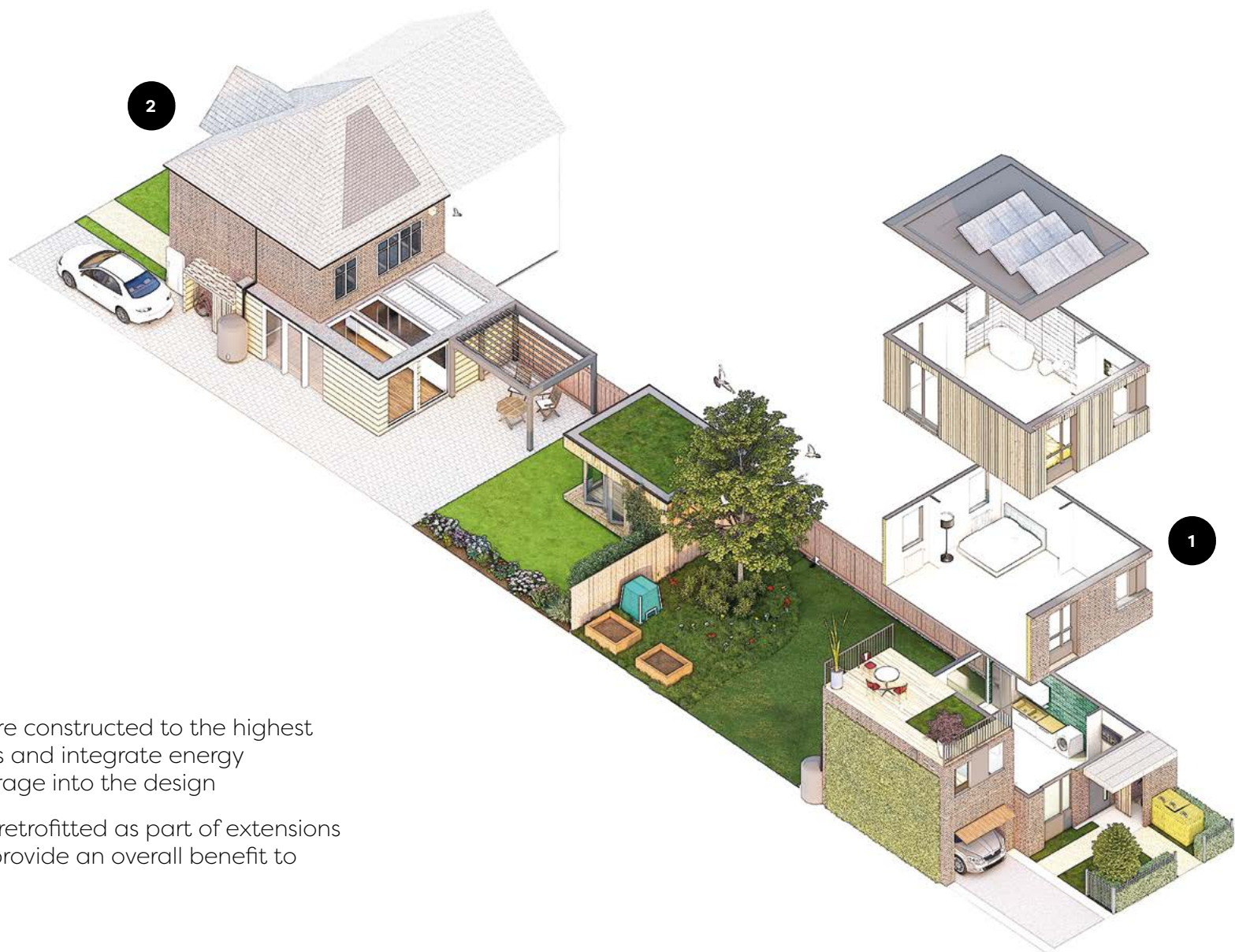
## The Building

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 1000m <sup>2</sup> or more 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

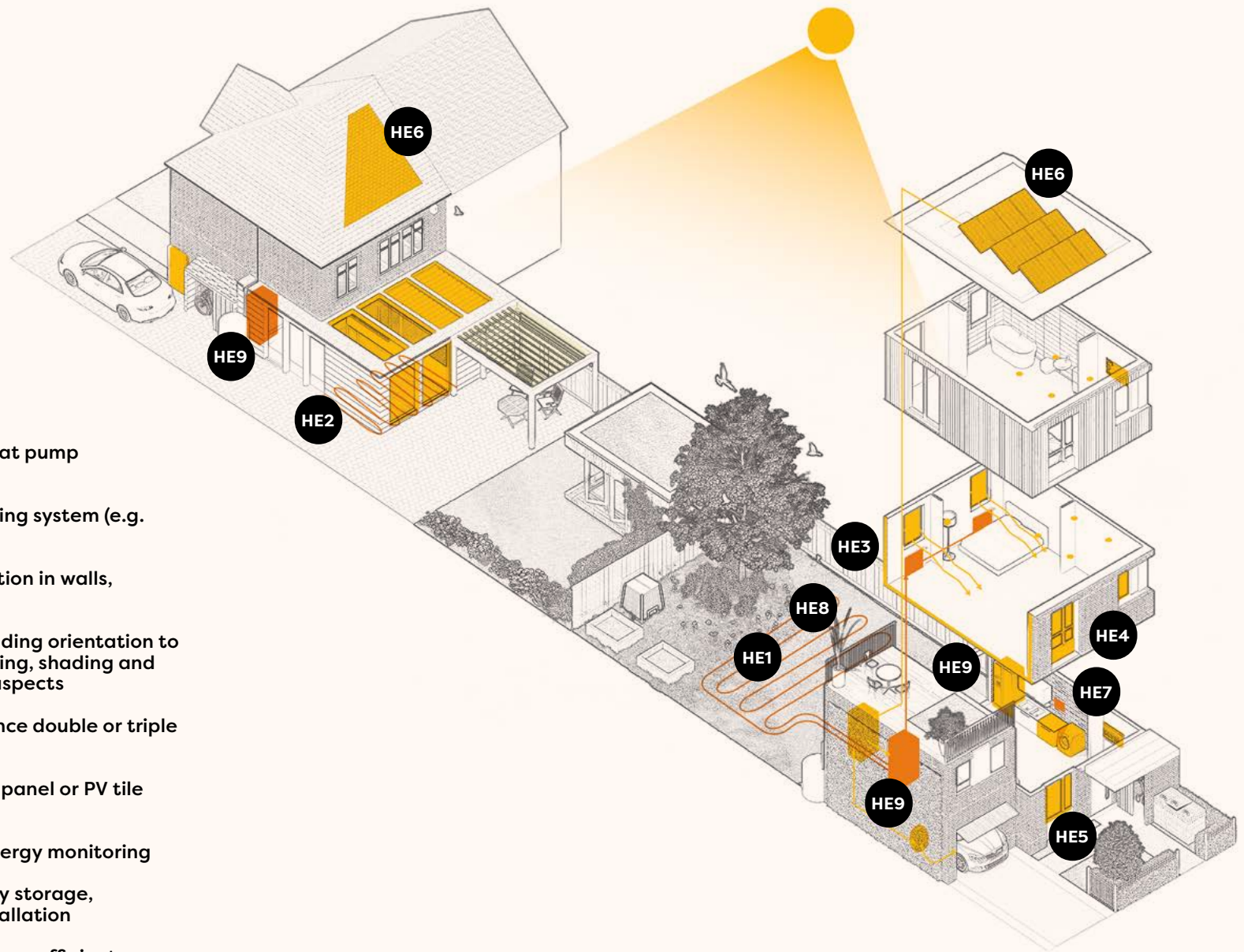


FIGURE 42: THE BUILDING - ENERGY

# '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)

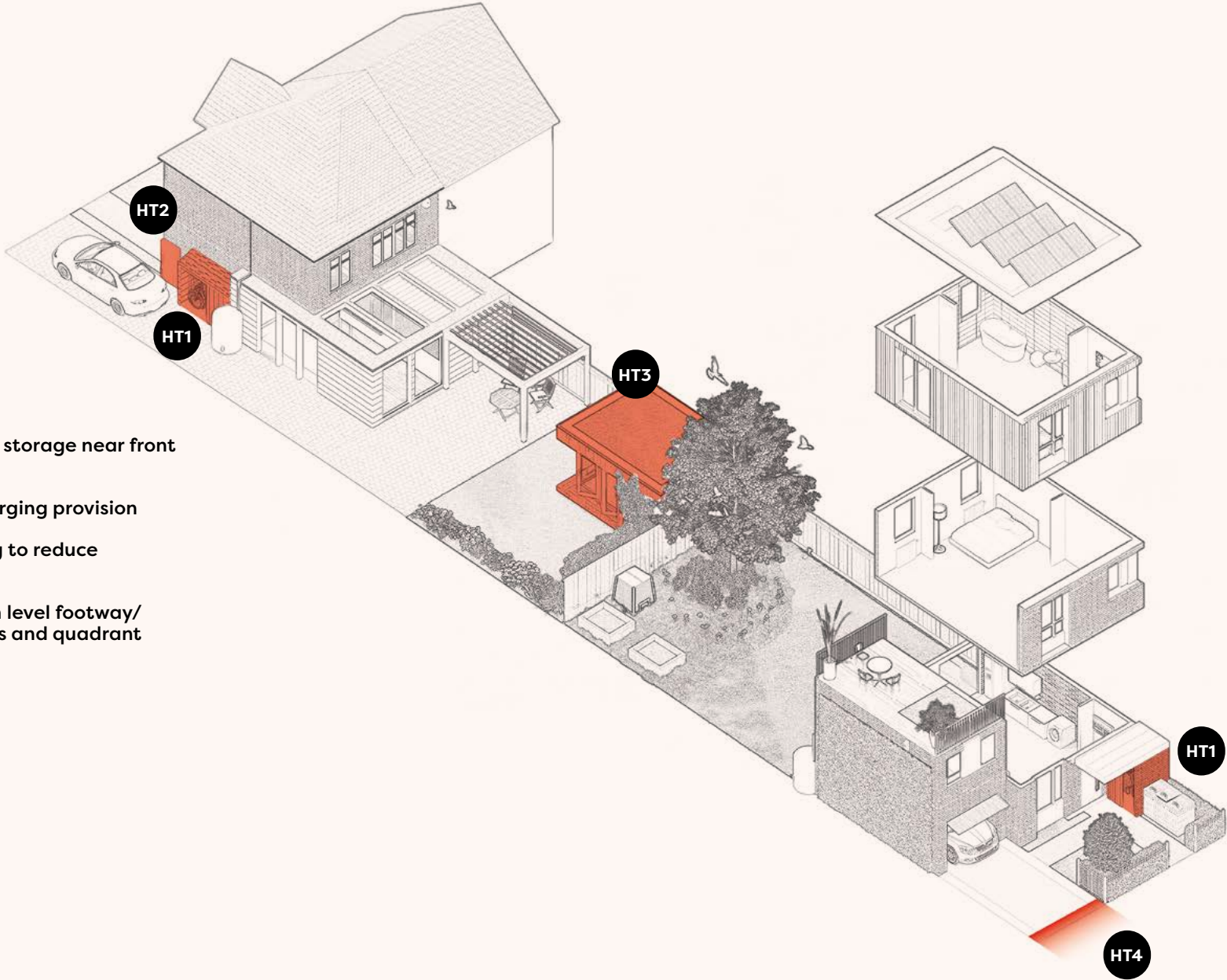


FIGURE 43: THE BUILDING - TRANSPORT

*'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

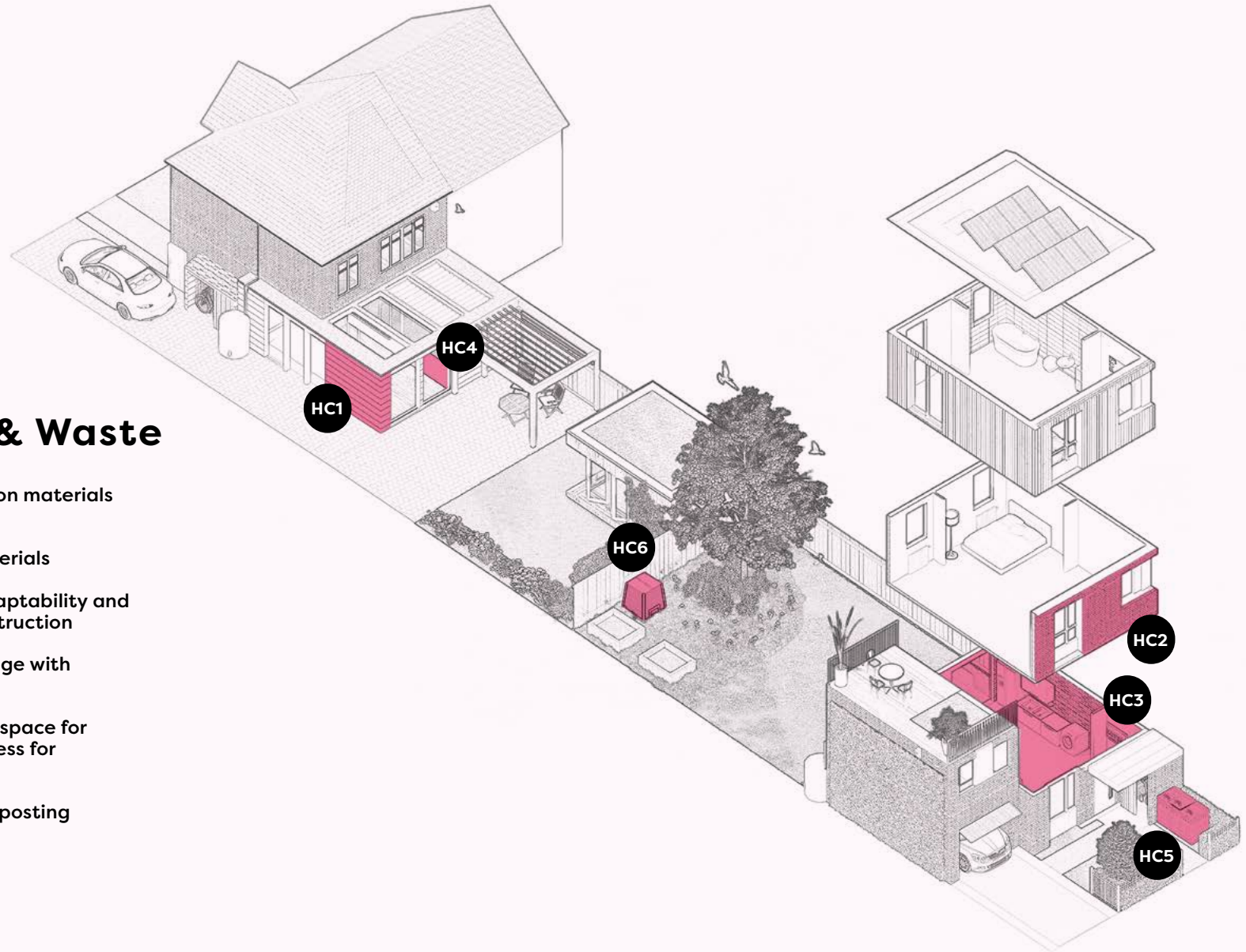


FIGURE 44: THE BUILDING - MATERIALS, CONSTRUCTION & WASTE

### '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

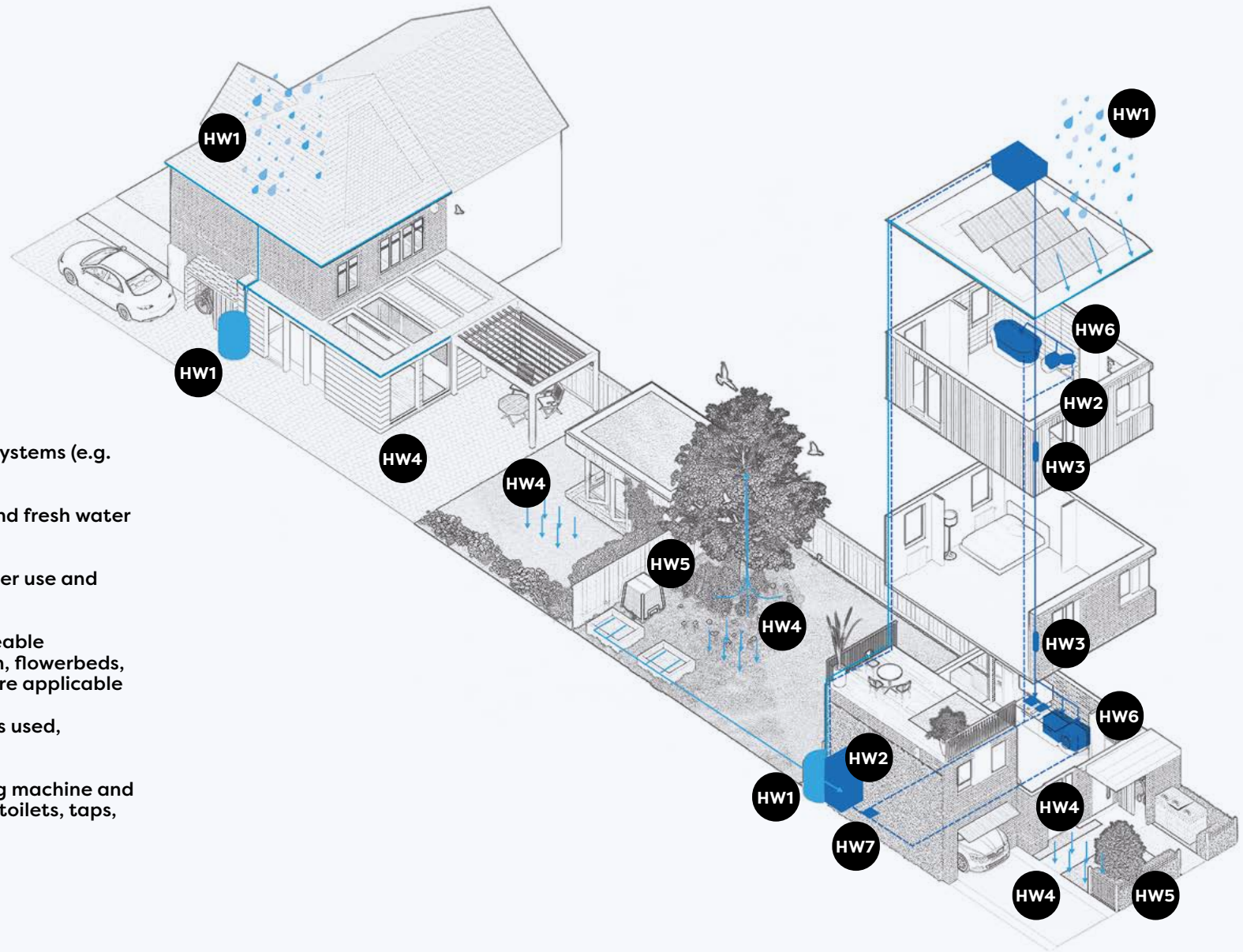


FIGURE 46: THE BUILDING - WATER

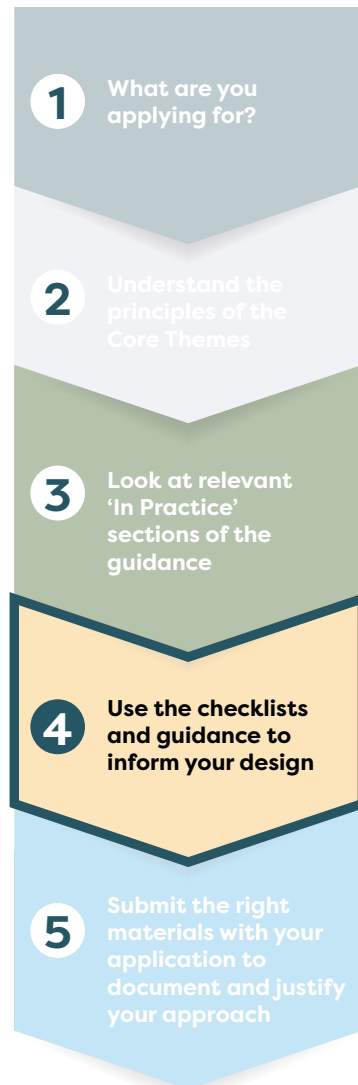
# 'The Building' Space & Place Design

- 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/page/1027/making-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

Spelthorne Local Plan 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>						
PS1: Responding to the Climate Emergency	<p>Inclusion of renewables, energy conservation</p> <p>Optimise design, layout and orientation to minimise energy usage.</p>	<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> <p><b>HE5</b> Double / triple glazing</p> <p><b>HE6</b> Installation of photovoltaic (solar) panels / tiles</p> <p><b>HE7</b> Install smart meter / energy monitoring</p> <p><b>HE8</b> In-home battery energy storage, integrated with PV installation</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

Spelthorne Local Plan 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>						
PS1: Responding to the Climate Emergency	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				
ID2: Sustainable Transport for New Developments	Accessibility by non-car means Secure cycle parking provision	<b>HT</b> Other, please state				

**CHECKLIST 1:**

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

Spelthorne Local Plan 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>						
PS1: Responding to the Climate Emergency	<p>Incorporate provision for the storage of waste and recyclable materials</p> <p>Use of sustainable construction materials.</p>	<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>				

## CHECKLIST 1:

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

Spelthorne Local Plan 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>						
E2: Biodiversity	New development contributes to restoring and enhancing habitats, biodiversity and avoids harm to protected sites	<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				
E4: Environmental Protection	Design and energy saving measures to reduce light pollution	<b>HG6</b> Green roof / walls <b>HG</b> Other, please state				

**CHECKLIST 1:**

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

Spelthorne Local Plan 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>						
PS1: Responding to the Climate Emergency	Promoting the efficient use and conservation of water resources	<b>HW1</b> Rainwater harvesting systems e.g. water butts <b>HW2</b> Separate grey water and fresh water systems <b>HW3</b> Water use limits and smart metering				
E3: Managing Flood Risk	Promoting measures to reduce flooding and risks from flooding	<b>HW4</b> Retain / expand permeable outdoor areas e.g. lawn, flowerbeds, permeable paving where applicable <b>HW5</b> Drought tolerant plants used, where applicable <b>HW6</b> Water-efficient appliances and fixings e.g. washing machine, taps				
E4: Environment Protection	Ensure development located near ground and surface water include measures to mitigate impacts on water quality	<b>HW7</b> Installation of leak detection system <b>HW</b> Other, please state				
E1: Green and Blue Infrastructure	Should be planned, designed and managed to achieve multiple benefits					

# CHECKLIST 1:

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

Spelthorne Local Plan 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>						
PS2: Designing Places and Spaces	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> Shaded and sheltered space outside front doors</p> <p><b>HD3</b> Use of materials to reduce local heating and microclimate effects, especially on south-facing aspects</p>				
PS1: Responding to the Climate Emergency	<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>HD</b> Other, please state</p>				



# 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 what to include on an energy statement as well as potential measures that can be included on 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 (e.g. bicycle storage, EV charging);
- matters relating to materials and building works
- Energy Statements should include the below checklist to clearly demonstrate that the necessary information has been provided and where it can be found. The completed Energy Statement / Energy Statement Checklists should be proportionate to the proposal

Please submit the completed checklist with your planning application.

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

Spelthorne Local Plan Policy	Policy promotes and/or requires:	Measures to be addressed through the Energy Statement	Considered in the proposed development scheme?			If YES, information should be formatted in an Energy Statement If NO or N/A, please explain or state reasons
			Yes	No	N/A	
<b>ENERGY (ENERGY STATEMENT CHECKLIST)</b>						
PS1: Responding to the Climate Emergency	<p>Inclusion of renewables, energy conservation</p> <p>Optimise design, layout and orientation to minimise energy usage.</p> <p>Encouraging renewable energy equipment installation, sustainable construction materials, encouraging developments to attain high energy efficiency rates e.g. BREEAM 'very good'.</p>	<p>Completed Energy Statement / Energy Statement Checklist proportionate to the proposal</p> <p>Summary table confirming baseline, energy targets and standards being met</p> <p><b>HE1, HE2, SE1, SE4:</b> Heat supply strategy, including consideration of low carbon options (e.g. ASHP, GSHP, heat networks, boilers)</p> <p><b>HE3:</b> Fabric first approach: insulation levels for walls, roofs and floors</p> <p><b>HE4:</b> Consideration of building orientation, ventilation, windows and shading for both solar gain and cooling</p> <p><b>HE5:</b> Glazing strategy, including performance and mitigation of overheating</p> <p><b>HE6, HE8:</b> zero carbon energy generation, where feasible (e.g. photovoltaics)</p> <p><b>HE7:</b> Commitment to delivery and post-construction verification through energy monitoring/smart meters</p> <p><b>HE9, SE3:</b> Energy-efficient lighting and appliances, where known</p> <p>Predicted energy use and carbon emissions summary</p> <p>Justification for any measures not provided, having regard to viability, constraints or scale</p>				

## CHECKLIST 2:

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

Spelthorne Local Plan 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>						
PS1: Responding to the Climate Emergency	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 retain level footway / cycleway				
ID2: Sustainable Transport for New Developments	Accessibility by non-car means Secure cycle parking provision	<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 <b>T</b> Other, please state				

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

Spelthorne Local Plan 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>						
PS1: Responding to the Climate Emergency	<p>Incorporate provision for the storage of waste and recyclable materials</p> <p>Use of sustainable construction materials.</p>	<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>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)

Spelthorne Local Plan 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>						
E2: Biodiversity	New development contributes to restoring and enhancing habitats, biodiversity and avoids harm to protected sites	<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>HG6</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				
E4: Environmental Protection	Design and energy saving measures to reduce light pollution					

**CHECKLIST 2:**

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

Spelthorne Local Plan 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>						
PS1: Responding to the Climate Emergency	Promoting the efficient use and conservation of water resources	<b>HW1</b> Rainwater harvesting systems e.g. water butts <b>HW2</b> Separate grey water and fresh water systems <b>HW3</b> Water use limits and smart metering				
E3: Managing Flood Risk	Promoting measures to reduce flooding and risks from flooding	<b>HW4</b> Retain / expand permeable outdoor areas e.g. lawn, flowerbeds, permeable paving where applicable <b>HW5</b> Drought tolerant plants used, where applicable <b>HW6</b> Water-efficient appliances and fixings e.g. washing machine, taps				
E4: Environment Protection	Ensure development located near ground and surface water include measures to mitigate impacts on water quality	<b>HW7</b> Installation of leak detection system <b>SW1</b> Use of Sustainable Urban Drainage Systems in public areas, integrated with planting <b>W</b> Other, please state				
E1: Green and Blue Infrastructure	Should be planned, designed and managed to achieve multiple benefits					

## CHECKLIST 2:

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

Spelthorne Local Plan 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>						
PS2: Designing Places and Spaces	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, HD2</b> Shaded outdoor areas and amenity space through building overhangs, trees / vegetation or other structures.</p> <p><b>HD3</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>				
PS1: Responding to the Climate Emergency	<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 Energy Statement and Climate Change 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 energy and climate change measures that should be incorporated into the scheme wherever possible. During early design stages, thought should be given to achieving the energy hierarchy (Be Lean, Be Clean, Be Green) and how the design will be resilient to changes in the climate.

This Energy statement and climate change 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 in addition to the required Energy Statement. 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:

- 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.





















**SPELTHORNE BOROUGH COUNCIL**

**CLIMATE CHANGE**

**SUPPLEMENTARY PLANNING DOCUMENT**

**TOWN & COUNTRY PLANNING (LOCAL PLANNING)  
(ENGLAND) REGULATIONS 2012 (AS AMENDED)**

**REGULATION 12 STATEMENT OF CONSULTATION  
JUNE 2026**

## PURPOSE OF THIS STATEMENT

1. This Statement of Consultation has been prepared in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). It sets out:
  - the persons and organisations consulted in the preparation of the update to the Climate Change Supplementary Planning Document (“SPD”), originally adopted in 2023.
  - the methods of consultation undertaken.
  - a summary of the main issues raised during consultation; and
  - how those issues have been taken into account in finalising the SPD.

## CONSULTATION UNDERTAKEN

2. Consultation was undertaken between Friday the 8 May 2026 and the 5 June 2026.
3. Notification of the consultation was sent via email on the 8<sup>th</sup> of May. It was issued to a mailing list held by the Council’s Strategic Planning Team. The mailing list comprised various individuals and organisations, including:
  - General consultation bodies identified in the Council’s Statement of Community Involvement (“SCI”), including voluntary bodies active in the local area, Neighbourhood Forums, and organisations representing the interests of different racial, ethnic or national groups, different religious groups, disabled persons, and persons carrying out business in the area.
  - Specific consultation bodies identified in the Council’s SCI. These include utility companies, government agencies, regional and local authorities and parish Councils.
  - Other prescribed bodies and stakeholders with an interest in planning policy matters within Spelthorne.
  - Organisations and individuals who have expressed an interest in receiving notifications relating to strategic planning matters in Spelthorne.
4. The draft SPD and supporting consultation materials were published on the Council’s website. The consultation was also hosted on the Council’s online engagement hub on Commonplace, which included an online survey to enable interested parties to submit representations.
5. Other ways for all stakeholders to respond to the consultation were made available, including by email to the designated Strategic Planning inbox [planning.policy@spelthorne.co.uk](mailto:planning.policy@spelthorne.co.uk), or alternatively by post to Strategic Planning, Council Offices, Knowle Green, Staines-upon-Thames, TW18 1XB

6. The consultation was publicised through the Council's social media posts, including Facebook, Instagram, LinkedIn and X.
7. Hard copies of the consultation documents were made available in the Council's main office and in the Borough's libraries.

## **MAIN ISSUES RAISED IN THE CONSULTATION AND THE COUNCIL'S RESPONSE**

8. In total, 16 valid representations were received from the public, including residents, local groups, statutory consultees and other interested external organisations, to this consultation. Internal comments from other departments within the Council were also received. 2 responses were also received from private individuals via Commonplace, which were not validated but provided respondent details.
9. Statutory consultees who responded to the consultation included:
  - National Highways
  - Natural England
  - Historic England
  - Surrey County Council
  - Elmbridge Borough Council
  - Waverley Borough Council
10. The key issues raised in the consultation are as follows:

### **STRENGTH OF REQUIREMENTS**

- Some calls for stronger and more enforceable standards for energy efficiency, water saving, sustainability and climate adaptation measures and some concerns about unclear and vague guidance and checklists. Respondents also reiterated that SPD requirements should remain proportionate, viable, and aligned with the adopted Local Plan.

### **FLOOD RISK AND WATER MANAGEMENT**

- Requests for stronger focus on groundwater, river and surface water flooding, including impacts on aquifers and drainage, alongside clearer developer guidance, mandatory mitigation measures, enhanced SuDS requirements, and greater consideration of groundwater effects.

## ENERGY, HEATING AND NET ZERO STANDARDS

- Suggestions for stronger energy guidance through recognised standards such as Passivhaus, LETI, NABERS and UK Net Zero Carbon Building Standards, alongside clearer requirements for heat pumps, district heating, renewable energy and energy storage. Respondents also reiterated the need to align with current regulations and Future Homes Standard requirements, while better distinguishing between residential and commercial standards.

## SUSTAINABLE TRANSPORT AND REDUCING CAR DEPENDENCE

- Strong support was expressed for active travel measures, including walking, cycling, EV charging infrastructure and travel hierarchy principles, alongside better public transport integration, uses and experiences and reduced reliance on private vehicles.

## GREEN INFRASTRUCTURE, AIR QUALITY AND CLIMATE RESILIENCE

- Support for urban greening, tree planting, green infrastructure and climate resilience measures, alongside calls for evidence-based greening and air quality assessments. Some calls for local food production through allotments, communal growing spaces and gardens.

## CLARITY, CONSISTENCY AND TECHNICAL ACCURACY

- Some identified greater consistency needed for definitions, technical terminology explanation, diagrams, checklists and acronym expansion. Formatting, typographical and other clerical errors should be amended.

## VIABILITY

- Some concerns that SPD requirements could exceed Local Plan policy and affect development viability, alongside calls for greater flexibility to reflect site-specific constraints, commercial uses and the scale of development.
11. The table below provides further detail on the responses received, sets out the Council's responses to the representations, and confirms the extent to which the SPD was amended to reflect them.

SPELTHORNE BOROUGH COUNCIL CLIMATE CHANGE SUPPLEMENTARY PLANNING DOCUMENT STATEMENT OF  
CONSULTATION- JUNE 2026

	REPRESENTOR	SUMMARY OF REPRESENTATION	COUNCIL'S RESPONSE	AMEND SPD?
1.	Elmbridge Borough Council (via email)	At this stage, we have no comments to raise but would welcome ongoing engagement as the work progresses.	Noted	None required.
2.	Natural England (via email)	Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.	Noted	None required.

3.	Mark Sitch obo SEGRO (via email)	<p>We are generally supportive of the approach proposed in the revised SPD.</p> <ul style="list-style-type: none"> <li>The reference to PassivHaus Certification on page 21 should specify that this applies only to residential developments, not commercial development.</li> <li>The Urban Greening Factor guidance on page 36 should clarify that the recommended score of 0.3 applies to predominantly commercial developments and excludes B2 and B8 uses due to their operational characteristics.</li> </ul> <p>Regarding the Energy Statement Checklist and Policy PS1:</p> <ul style="list-style-type: none"> <li>Concerns are raised that the SPD wording requiring developments to demonstrate “compliance” with energy principles is too prescriptive and exceeds the adopted Local Plan policy, which instead seeks to</li> </ul>	<p>Do not consider an exception should be made for commercial</p> <p>Is not considered necessary for clarity</p> <p>There is only one instance of “comply” on page 81</p>	<p>None required</p> <p>None required</p> <p>None required</p>
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		<p>“maximise” and “encourage” measures.</p> <ul style="list-style-type: none"> <li>• The requirement for applicants to justify measures not included, particularly on viability grounds, is viewed as potentially onerous and unsupported by policy.</li> <li>• It is suggested that the SPD should instead refer to “broad alignment” with the principles and the inclusion of site- and scheme-specific measures where appropriate.</li> <li>• The respondent supports the SPD’s recognition of carbon offsetting for residual embodied carbon emissions within the Construction &amp; Waste Checklist.</li> </ul> <p>Additional comments relate to the proposed Distribution Network Operator (DNO) requirements:</p> <ul style="list-style-type: none"> <li>• The respondent notes these requirements are not explicit within Policy PS1 and should not appear as mandatory planning policy requirements.</li> </ul>	Noted	<p>SPD will be amended for clarity to state 2.31: Developers should engage early with the DNO to determine whether:</p>
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SPELTHORNE BOROUGH COUNCIL CLIMATE CHANGE SUPPLEMENTARY PLANNING DOCUMENT STATEMENT OF  
CONSULTATION- JUNE 2026

		<ul style="list-style-type: none"> <li>• They consider the information more relevant to DNO connection and capacity processes rather than planning applications.</li> <li>• The respondent argues such information should not be required within Energy Statements and that the planning system should rely on other consenting regimes operating effectively rather than duplicating their requirements.</li> </ul>	It is not “required” in the energy statement	None required
4.	Surrey County Council (via email)	<p>We are pleased to note the document is clear and comprehensive overall.</p> <p>It may be useful to align the document with the latest government position on clean energy, particularly for heat network zoning and the latest thinking on energy storage, flexibility and overheating.</p>	Noted	<p>Official government policy includes: CP30, WHP, current LA heat network zones (surrey not currently included) , clean flexibility roadmap, future homes standard. This is beyond the scope of the update but will be considered as part of the Local Plan immediate review.</p>



SPELTHORNE BOROUGH COUNCIL CLIMATE CHANGE SUPPLEMENTARY PLANNING DOCUMENT STATEMENT OF  
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		<p>In Section 2.17 (“Be Green”), we note that where a district or site-wide heating system is not feasible, heat pumps or other low carbon efficient technology should supply heat. This should be mentioned in this section or the “Be Clean” section.</p> <p>The checklists at the end of the document are clear and concise. We suggest that HE3 is listed first in order to align the checklist with the energy hierarchy.</p>	<p>Noted</p> <p>Noted</p>	<p>Add a sentence after 2.16 reading: Where a district or site-wide heating system is not feasible, heat pumps or other low carbon efficient technology should supply heat.</p>
5.	<p>Historic England (via email)</p>	<p>English Heritage has no comments on the consultation documents.</p>	<p>Noted</p>	<p>None required</p>

6.	National Highways  (via email)	<p>The transport chapter of the Climate Change SPD sets a clear direction towards reducing transport-related carbon emissions by prioritising sustainable travel, integrating development with active and public transport networks, and promoting measures such as travel planning and electric vehicle infrastructure. It reflects a “avoid–shift–improve” approach, aiming to minimise car dependency while ensuring new developments are well-connected and designed to encourage sustainable travel behaviour.</p> <p>The document also shows how transport should work in practice within the neighbourhood, the street and the building focusing on proximity to public transport and promoting active travel.</p> <p>We have undertaken a review of the objectives set out in the SPDs and welcome the clear focus on reducing reliance on private vehicles and supporting a shift to more sustainable modes of travel. The overall approach is consistent with national policy objectives and conforms with Local Development Plans.</p> <p>The policies contained within the SPDs will not have a significant impact on the Strategic Road Network. Therefore, National Highways has no further comment to make regarding these documents.</p>	Noted	None required
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SPELTHORNE BOROUGH COUNCIL CLIMATE CHANGE SUPPLEMENTARY PLANNING DOCUMENT STATEMENT OF  
CONSULTATION- JUNE 2026

7.	<p>Waverley Borough Council</p> <p>(via email)</p>	<p>Waverley welcomes the update to the Climate Change SPD and supports the objective of improving climate resilience and reducing carbon emissions from new development. The Council particularly supports the provision of practical guidance to applicants on sustainable construction and adaptation measures.</p> <p>It would be helpful to ensure that implementation expectations remain clear, proportionate and consistent with national policy and building regulations requirements, particularly where viability constraints arise.</p>	Noted	None required
8.	<p>Private Individual</p> <p>(via email)</p>	<p>The respondent provided feedback mainly highlighting need to improve clarity, consistency, accuracy, formatting, terminology and cross-referencing throughout the document. The respondent sought consistency with definitions of “major” and “minor” development, particularly regarding floorspace and site area thresholds.</p> <p>Particular change recommendations included:</p> <ul style="list-style-type: none"> <li>• Clarifying development classification thresholds.</li> <li>• Correcting technical inaccuracies and clerical errors.</li> <li>• Updating outdated references and broken links.</li> <li>• Improving readability and usability for applicants.</li> </ul>	<p>Technical inaccuracies, clerical errors and inconsistencies noted.</p>	<p>SPD to be updated to be more consistent, technically accurate and ensure better clarity.</p>

SPELTHORNE BOROUGH COUNCIL CLIMATE CHANGE SUPPLEMENTARY PLANNING DOCUMENT STATEMENT OF CONSULTATION- JUNE 2026

		<ul style="list-style-type: none"> <li>Ensuring correct alignment of diagrams, figures and checklists with the written guidance.</li> </ul>		
9.	Private Individual (via Commonplace)	<p>The respondent provided generally positive feedback on the revised draft SPD.</p> <p>They felt the document used clear and accessible language, commenting that it was “easy to fathom the general consensus,” and found the diagrams easy to understand. They also believed the checklist would help applicants.</p> <ul style="list-style-type: none"> <li>While they did not suggest specific changes to the SPD, they noted that “not everything is about targets” and encouraged the Council to consider the impact of policies on local people as well as broader national objectives.</li> </ul>	Noted	None required
10.	Private Individual (via Commonplace)	<p>The respondent was strongly supportive of the revised draft SPD overall, describing it as “excellent” and praising the clarity of the language, the diagrams and the use of examples from other towns.</p> <p>However, they expressed concerns about the level of attention to flood risk, particularly groundwater flooding in parts of Staines. They felt the references to flood risk in the checklist were too vague and called for clearer, more detailed guidance for developers on mitigating both river and groundwater flooding, including</p>	Noted	None required

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		reducing impacts on aquifers and groundwater pressure. The respondent specifically referenced Dr Jonathan Paul's report in relation to groundwater risks.		
11.	Private Individual (via Commonplace)	The respondent provided positive feedback on the revised draft SPD. They agreed that the document uses clear and accessible language and felt that the checklist would help applicants apply the guidance.	Noted	None required.
12.	Private Individual (via Commonplace)	The respondent provided generally positive feedback on the revised draft SPD. They indicated that the document mostly used clear and accessible language, although their additional comment suggested it was only clear "to some extent." They also found the diagrams easy to understand and sufficiently detailed. The respondent was uncertain about whether the checklist would help applicants.	Noted	None required.
13.	Private Individual (via Commonplace)	The respondent provided positive feedback on the revised draft SPD, agreeing that the document uses clear and accessible language and that the checklist would be helpful for applicants.	Noted	None required.

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14.	Private Individual (via Commonplace)	<p>The respondent was broadly positive about the revised draft SPD, describing it as a 'comprehensive document'. They considered the language, technical explanations, diagrams and checklist to be clear, accessible, and useful for applicants.</p> <p>However, they suggested that the SPD should place greater emphasis on the impact of climate change on food production. They highlighted the importance of localising food production in the same way the SPD addresses local energy generation and storage. The respondent advocated for recognition of spaces for growing food, such as private gardens and communal allotments, reflecting the approach taken by earlier planners.</p>	Noted	None required.
15.	Private Individual (via Commonplace)	<p>The respondent expressed general support for the revised draft SPD. They felt the document was clear and accessible, confirming that the language, technical explanations, and diagrams were easy to understand. They also agreed that the checklist would be helpful for applicants.</p>	Noted	None required.
16.	Private Individual (via Commonplace)	<p>Generally supportive of the revised draft SPD, describing the language, diagrams, and checklist as clear, accessible, and helpful and particularly welcoming the inclusion of the checklist.</p> <p>However, they noted they would have preferred a Climate Crisis SPD. They also highlighted challenges experienced as a heat pump user in Spelthorne, particularly difficulties accessing</p>	Noted	None required.

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		trustworthy advice on low-carbon heating options, such as air source heat pumps versus solar energy. They suggested the Council could consider providing advisory services, or endorsing trusted installers and advisers, to give residents greater confidence when improving their homes.		
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## NEXT STEPS

12. The Council has considered all responses received to the consultation and has made a number of corresponding amendments to the update to the Climate Change SPD.
13. A final version of the SPD will be presented to a Council Meeting on the 29 June for adoption.

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## Equality Analysis

<b>Directorate:</b> Regeneration & Growth  <b>Service Area:</b> Strategic Planning	<b>Lead Officer:</b> Jane Robinson, Local Plans and Infrastructure Manager  <b>Date completed:</b> June 2026
<b>Service / Function / Policy / Procedure to be assessed:</b>  Climate Change Supplementary Planning Document	
<b>Is this:</b> New / Proposed <input type="checkbox"/> Existing/Review <input checked="" 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?

<p>➤ The Climate Change Supplementary Planning Document (SPD) encourages the delivery of more sustainable design for future developments within Spelthorne and supports the effective implementation of climate change policies within the Spelthorne Local Plan 2024-2039/40. The document supports the Council in meeting its Public Sector Equality Duty by ensuring the delivery of sustainably designed future development considers the diverse needs of residents.</p>
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#### 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 Leigh Street. **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 Climate Change SPD seeks to provide guidance on delivering climate-resilient future development, including mitigation and adaptation measures and to ensure that sustainability is embedded within the planning application process through clear design principles. The SPD outcomes include reducing carbon emissions from new development; increasing the resilience of buildings, public spaces, and communities to climate impacts, such as heatwaves, flooding, and extreme weather; ensuring development follows clear standards for energy efficiency, water management, transport, materials, and biodiversity. The document also supports Spelthorne’s ambition to reach Net Zero by 2030.</p> <p>These outcomes are sought for all residents but more particularly those vulnerable to heat, cold, and flooding. Future residents of new developments will also benefit from improved energy bills, resilient homes, and healthy environments, along with local businesses and employees who will likewise benefit from efficient buildings as well as sustainable transport. Spelthorne’s diverse communities will also benefit from reduced pollution as well as improved public realm and green spaces. Biodiversity Net Gain (BNG) and green infrastructure principles will also benefit the natural environment.</p>
<p><b>Are there any associated policies, functions, services, or procedures?</b></p>	<p>The Climate Change SPD is associated with a range of existing policies, functions, services and procedures, including interpreting and relying on local and national policy frameworks, including the National Planning Policy Framework (NPPF) (2025) and Draft NPPF (2026). The SPD also directly supports and provides further guidance on the</p>

	<p>Spelthorne Local Plan 2024-2039/40 (particularly Policy PS1 and its supporting evidence). There are also associated strategies, plans and national legislation, such as the Spelthorne Climate Change Strategy 2022–2030, Surrey County Council Transport Plan, Local Cycle and Walking Infrastructure Plans (LCWIPs) and environmental legislation, specifically in regard to Biodiversity Net Gain under the Environment Act 2021. Associated processes include</p> <p>The SPD also supports compliance with the Equality Act 2010 by ensuring that the sustainably designed future development reflects 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>The delivery of climate-resilient development involves Surrey County Council in regard to highways, transport planning, EV infrastructure, and flood risk matters. Delivery of sustainably designed development also involves key partners such as developers, landowners and planning applicants, utility providers (e.g. Energy networks, water companies, drainage authorities). environmental bodies (e.g. Natural England, DEFRA, Environment Agency (BNG, SuDS guidance).</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 Climate Change SPD. The SPD draws on several key datasets that provide detailed information about increasing climate risks, including heatwaves and flooding, which disproportionately affect older people, disabled people, young children, pregnant women, and those with pre-existing health conditions (Section 1 and 2).

The evidence highlights the need for shade, access to nature, improved and accessible public spaces, specifically accessible active travel routes supporting users with mobility needs, safe streets, and reduced pollution. The evidence also highlighted some economic benefits, including reduced travel costs and cheaper heating bills.

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 climate change impacts and needs to ensure

climate-resilience, though detailed data for some protected groups (e.g. ethnic minorities, LGBTQ+ residents, Gypsy & Traveller communities) is limited and could go further to understand which groups are most affected by climate change-related issues. Future updates and consultation to understand the needs of these groups 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 Climate Change SPD 2026 Update has been developed using existing evidence sources and a public consultation on the original SPD took place between 18 September 2023 and 16 October 2023. Statutory Public Consultation for this update to the Climate Change SPD ran for 4 weeks, from the 8 May 2026 to 5 June 2026. This enabled all stakeholders to provide comment before the final version of the SPD. The

In line with the Council's Statement of Community Involvement (SCI), the certain consultees, bodies and groups 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 climate-resilience or the update to the Climate Change SPD. The statutory consultation ran for 4 weeks from the 8 May 2026 to 5 June 2026. Understanding the needs of the Borough's diverse groups, including residents with a disability, of different age groups and from different ethnic background etc. will also assist the assessment.

### 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)	<ul style="list-style-type: none"> <li>• Climate measures such as EV charging, heat-pump installation, retrofit requirements or home energy standards may create cost or accessibility barriers for older and younger residents, particularly those on lower incomes.</li> <li>• Older people may be more vulnerable to heatwaves, cold homes, poor air quality and may need more accessible adaptation measures.</li> <li>• Children and young people are more exposed to poor air quality, heat stress and flood risk in some neighbourhoods.</li> <li>• Without age-specific analysis, the SPD risks assuming all groups can access and benefit from retrofit, energy efficiency advice or climate-adaptation measures equally.</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure consultation deliberately seeks input from older people, youth groups, and schools.</li> <li>• Incorporate age-specific vulnerability data (heat vulnerability, fuel poverty rates, mobility needs) into future evidence updates.</li> <li>• Provide plain-English guidance, accessible formats, and targeted communications for older residents.</li> <li>• Encourage developers to design schemes that respond to heat resilience, shade, green infrastructure, and accessibility for residents of all ages.</li> </ul>
<b>Disability</b> (including carers)	<ul style="list-style-type: none"> <li>• Disabled residents may face higher energy needs, mobility challenges, and reliance on assistive technology—meaning poorly insulated homes or heatwaves disproportionately affect them.</li> <li>• Retrofit measures (e.g., loft insulation, internal wall insulation) can be physically disruptive and difficult for disabled residents.</li> <li>• EV charging or cycle infrastructure may be inaccessible to wheelchair users and those with limited mobility if not designed properly.</li> <li>• Residents relying on benefits may struggle to afford adaptation/energy improvements without support.</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure engagement captures the views of disabled residents and carers early in the process.</li> <li>• Promote inclusive design by encouraging accessible EV charging bays, step-free routes, and accessible sustainable transport.</li> <li>• Encourage developers to integrate thermal comfort, ventilation, and accessible design into sustainability proposals.</li> <li>• Consider signposting to grants, national retrofit funding and local support for energy efficiency measures.</li> </ul>

<p><b>Gender</b> (men and women)</p>	<ul style="list-style-type: none"> <li>• Women, particularly single-parent households, may be disproportionately affected by fuel poverty and may have less capacity to absorb energy-related costs.</li> <li>• Men may be more represented in sectors impacted by changes required for sustainable construction or skills transitions.</li> <li>• The SPD does not currently assess gender-specific responses to climate vulnerabilities or ability to participate in consultation/retrofit schemes.</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure consultation captures a balanced gender mix and the needs of single-parent households.</li> <li>• Consider targeting engagement materials to groups more likely to experience fuel poverty.</li> <li>• Encourage developers to consider designing public realm for safety, lighting, and accessibility—issues which often have a gendered impact.</li> </ul>
<p><b>Race</b> (including Gypsies &amp; Travellers and Asylum Seekers)</p>	<ul style="list-style-type: none"> <li>• Ethnic minority groups nationally experience higher levels of fuel poverty, overcrowding, and housing in areas at flood/heat risk.</li> <li>• Gypsy &amp; Traveller communities may be affected by flooding, extreme heat, or energy-inefficient accommodation types.</li> <li>• Language barriers may affect ability to access retrofit schemes, climate guidance or consultation</li> </ul>	<ul style="list-style-type: none"> <li>• Engage directly with ethnic minority groups, Gypsy &amp; Traveller communities, and asylum-seeker support services.</li> <li>• Provide accessible information, translation where needed, and community-based outreach.</li> <li>• Integrate race-specific vulnerability evidence (e.g., heat/flood vulnerability) into future updates.</li> </ul>
<p><b>Religion or belief</b> (including people of no religion or belief)</p>	<ul style="list-style-type: none"> <li>• Some faith groups have multigenerational households which may experience higher heat stress, ventilation needs or fuel costs.</li> <li>• Places of worship may face specific challenges meeting retrofit or climate compliance standards due to heritage constraints.</li> </ul>	<ul style="list-style-type: none"> <li>• Consult with faith groups and community leaders on the SPD, particularly regarding impacts on places of worship.</li> <li>• Ensure guidance recognises the needs of heritage buildings and culturally specific living arrangements.</li> </ul>
<p><b>Gender Re-assignment</b> (those that are going through transition: male to female or female to male)</p>	<ul style="list-style-type: none"> <li>• Transgender and non-binary residents may experience higher income precarity, barriers to accessing services, or unsafe living conditions intensified by heat/cold or fuel costs.</li> </ul>	<ul style="list-style-type: none"> <li>• Engage with LGBTQ+ groups during consultation to understand specific climate-related vulnerabilities.</li> </ul>

	<ul style="list-style-type: none"> <li>• Lack of targeted evidence means their needs in relation to energy, safety or climate vulnerabilities may be overlooked.</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure public realm and active travel proposals (lighting, safety) consider the needs of LGBTQ+ residents who may feel less safe in poorly lit areas.</li> </ul>
<b>Pregnancy and Maternity</b>	<ul style="list-style-type: none"> <li>• Pregnant women and infants are particularly vulnerable to poor air quality, overheating, damp/mould, and cold homes.</li> <li>• Climate-related health impacts, such as extreme heat, disproportionately affect pregnant residents.</li> <li>• Low-income single-parent households may face barriers to retrofit or energy-efficiency upgrades.</li> </ul>	<ul style="list-style-type: none"> <li>• Encourage developers to include green infrastructure, shade, and good ventilation to reduce overheating.</li> <li>• Ensure consultation reaches single parents and families with infants.</li> <li>• Incorporate health-based vulnerability data (e.g., risks associated with heat).</li> </ul>
<b>Sexual orientation</b> (including gay, lesbian, bisexual and heterosexual)	<ul style="list-style-type: none"> <li>• LGBTQ+ residents may experience higher housing insecurity and may be more reliant on rented or shared homes which often have lower energy efficiency.</li> <li>• Without specific datasets, risks related to climate vulnerability or access to information may be overlooked.</li> </ul>	<ul style="list-style-type: none"> <li>• Engage with LGBTQ+ community groups and networks during consultation.</li> <li>• Ensure inclusive design principles in shared spaces and public realm measures.</li> <li>• Provide accessible climate information and signposting aimed at diverse households.</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 SPD relies on strong climate resilience-related 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. The SPD references inclusive design principles, accessibility expectations, and the need for equitable access to climate resilient development and benefits from this future development, across all protected groups. Further safeguards could be put in place, including embedding the consideration of impacts on all groups in the checklist process for applicants

## Step 5 – Monitoring

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


Monitoring of the Climate Change SPD will rely on existing planning and housing processes. This includes through the Council’s Local Plan monitoring, assessment by planning officers of conditions and obligations placed on planning permissions, the use of metrics and tools, the Urban Greening Factor, energy statements and renewable energy outputs, drainage strategies and SuDS performance and BREEAM/Passivhaus/other relevant accreditations

Together, these mechanisms will allow the Council to monitor whether the policy is delivering the intended outcomes and identify any impacts on residents, including those within protected groups.  
Monitoring will include reviewing any disproportionate impacts on protected groups by using anonymised equalities data where available.

## 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:

<p>Group Head:</p>  <p>S J Muirhead Group Head Commissioning and Transformation</p>	<p>Date: 10 June 2026</p>
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**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:**

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