



Spelthorne Borough Council Housing

Delivery Test Action Plan 2024

June 2025

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1. Introduction

Why Housing Delivery is important

- 1.1 There is wide publicity over the national housing crisis which we are experiencing in England. The lack of supply and pressure for new homes is felt most acutely in the South East of England. The Government is committed to building more homes as confirmed in the 2024 Spring Budget. This objective to increase the number of new homes is reflected in the revised National Planning Policy Framework (NPPF) 2024 and the continuation of the Housing Delivery Test.
- 1.2 The 2024 Housing Delivery Test result for Spelthorne Borough Council was published by the Secretary of State in December 2024. Spelthorne Borough Council scored **61%**. This compares with a figure of 68% in 2023, 69% for 2021, 50% for 2020, 60% for 2019 and 63% in 2018. The figure has, therefore decreased by 7% from the 2023 figure of 68%. As a result, and in response to this, the Council has produced a sixth Housing Delivery Action Plan to positively respond to the challenge of increasing its housing delivery. The Action Plan analyses the reasons for the under-delivery of new homes and sets out actions to improve housing delivery within the Borough.
- 1.3 The planning policy context to housing delivery contained in national and local plan policy is contained as Information Document 1 in Appendix 1.
- 1.4 An analysis of the housing delivery in Spelthorne is set out in Information Document 2 in Appendix 2. This includes the housing delivery test calculation for Spelthorne, housing land supply, need, delivery and trajectory and also planning performance.

2. The Action Plan Context

Aims of this Action Plan

- 2.1 This Action Plan is the Council's response to the challenge set out in the Government's National Planning Policy Framework to boost significantly the supply of homes and has five goals:
 - To examine the possible causes of the 'under delivery' of new homes in the Borough.
 - To explain what the Council has been doing so far to boost housing delivery.
 - To gather evidence on sites with planning permission (and sites under construction for housing development) to understand what barriers are preventing homes being built on these sites.

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- To build relationships with developers, landowners and agents responsible for building homes on sites that have planning permission, allowing the Council to adopt the role of an enabler of much needed residential development ensuring housing permissions are built out as quickly as possible.
 - To set out what actions the Council can take to increase the rate and number of homes built in Spelthorne.
- 2.2 Building houses is often a complex process. Often there are other factors beyond the council's control which explain why sites for housing do not come forward for development. It requires a broader approach to be taken to increase the delivery of new homes and the use of other tools available which are beyond the traditional remit of the Local Planning Authority.
- 2.3 The Housing Delivery Test Action Plan sets out key priorities and actions that the Council are undertaking to improve housing supply and delivery. The plan in itself is not a decision-making document but seeks to identify opportunities to improve housing provision.
- 2.4 Table 1 sets out the Council's corporate documents which all play a role in the delivery of housing.

Table 1 Spelthorne's corporate documents

Corporate Document	Overlap with Action Plan
Spelthorne Core Strategy and Policies DPD Document, February 2009	Housing Requirement Figure – 166 dwellings per annum superseded by housing need of 631 (+20% buffer) dwellings per annum (2024).
Emerging Local Plan	<p>A replacement Local Plan 2024-2039 is currently being prepared. The draft Local Plan 2024-2039 was submitted to the Secretary of State for independent Examination on 25 November 2022. The first examination hearing sessions were held in May 2023, following a pause in June 2023 these resumed in Jan 2025 and completed in Feb 2025.</p> <p>Following the examination hearings the Local Plan 2024-2039 has now progressed to a Main Modifications Consultation which is live until 15 May 2025.</p> <p>It is anticipated that the Local Plan</p>

	<p>2024-2039 will be formally adopted Autumn 2025.</p> <p>As a result of the examination hearings the Council is proposing through the Main Modifications to include an Immediate Review Policy which commits to producing an updated or replacement plan, which will be submitted for examination no later than two years from the date of adoption of this Local Plan 2024-2039.</p> <p>The Immediate Review will consider the housing requirement for the whole Borough based on the most up to-date national guidance. The monitoring of housing delivery, including the progress and implementation of sites, will inform the review.</p>
Corporate Document	Overlap with Action Plan
Corporate Plan 2024 - 2028	<p>Identifies five priorities:</p> <ul style="list-style-type: none"> • Community • Addressing Housing Need • Resilience • Environment • Services
Asset Management Strategy 2024/25 – 2027/28	<p>Covers the Council's property holdings and investment portfolio. Identifies priorities for the Investment portfolio, Development & Regeneration portfolio and Municipal Portfolio.</p> <p>These include the delivery of affordable housing and the meeting community needs.</p>
Housing, Homelessness and Roughsleeping Strategy 2025 - 2030	<p>Strategic priorities 2025-2030:</p> <ul style="list-style-type: none"> • Priority 1: Partnership Working: A multi-agency approach to tackling homelessness

Corporate Document	Overlap with Action Plan
	<ul style="list-style-type: none"> • Priority 2: Identifying opportunities to address housing need • Priority 3: Proactive homelessness prevention and an effective service response
Spelthorne Economic Prosperity Strategy 2023-2028	<p>The Spelthorne Economic Prosperity Strategy 2023-2028 builds upon the 2017-2022 Economic Strategy and continues to focus on prioritising the key needs for business to settle, grow and thrive. It also recognises that the environment and character of the Borough are key to achieving this.</p> <p>The vision of this strategy is: To secure sustained growth of the local economy for the benefit of businesses and residents whilst protecting the Boroughs environment and character.</p>

Assessment of under-delivery

- 2.5 Within this section, an assessment of the ‘under delivery’ of new homes in the Borough is considered which includes the local and national issues which influence housing delivery. A range of data and sources have been used to inform this analysis. As part of this process, the Council has engaged with stakeholders to improve its understanding of the issues affecting housing delivery. The analysis of the issues has been used to inform what actions the Council need to take to improve its housing delivery.

Implementation of Planning Permissions

- 2.6 Once planning permissions have been granted, local planning authorities have limited influence over deliverability. The timescales for implementing a planning permission are generally not considered to be a significant issue within the Borough. Under planning legislation, permission is required to start within three years from the date of the decision notice. Implementation generally occurs within the permission period. The NPPF advises at para. 81 that:

“To help ensure that proposals for housing development are implemented in a timely manner, local planning authorities should consider imposing a planning condition providing that development must begin within a timescale shorter than the relevant default period, where this would expedite the development without threatening its deliverability or viability. For major development involving the provision of housing, local planning authorities should also assess why any earlier grant of planning permission for a similar development on the same site did not start”.

- 2.7 However, there are some instances, where developers undertake the first stages of implementing a planning permission by carrying out the demolition of buildings on site and then delay the construction of the development. This happened, for example, at the former Centrica site in Staines-Upon-Thames. A two-year time period for all residential permissions was introduced by Spelthorne on 2 January 2020. This was an initiative to establish if a change in the timescales would assist in building out rates. However, it did not have a positive impact on housebuilding in Spelthorne and has created some confusion for applicants. Some developers have stated they have needed more time, particularly if site assembly is needed and often the only way forward is to re-submit the application in full. As a consequence, the time limit was reverted back to three years following the agreement of last year's HDTAP.
- 2.8 Planning Officers have continued to build relationships with developers, landowners and agents and carry on a dialogue after planning permission is granted. Pre-commencement planning conditions continue to be submitted, assessed and discharged by the officers.

Planning Decision Making Performance

- 2.9 The performance of decision making on planning applications is not considered to be a barrier to delivering new homes. Planning applications are being processed

within the statutory timeframes. The performance for the Local Planning Authorities (LPAs) are measured on their performance based on the % of planning applications they determine within specified timescales and on the numbers of applications allowed on appeal (the 'quality' assessment). This is outlined as follows:

- The **speed** of determining applications for **major** development
- The **quality** of decisions made by the authority on applications for **major** development;
- The **speed** of determining applications for **non-major** development;
- The **quality** of decisions made by the authority on applications for **non- major** development.

2.10 With just a few minor exceptions, non-major equates to a combination of the "minor" and "other" categories referred to above.

2.11 The quality measurement is the number of appeals allowed as a percentage of the total number of applications received in the category. The threshold for quality on both categories is **10%** and the **lower** the figure, the better the performance. The threshold for speed is **60%** (majors) and **70%** (non-majors) and the **higher** the figure, the better the performance.

2.12 On those sites where planning permission was refused, the appeal performance is good. The Council's assessment against the Government's targets is set out in table 2:

Table 2 Spelthorne's assessment against Government targets

Measure and type of Application	Threshold and assessment period	Spelthorne's Performance
Speed of Major Development	60% (October 2022 to September 2024)	100% N.B. The higher the % the better
Speed of non-Major Development	70% (October 2022 to September 2024)	99% N.B. The higher the % the better
Quality of Major Development *	10% (April 2022 to March 2024)	6 – 8.3%* and** N.B. The lower the % the better

Quality of Non-Major Development *	10% (April 2022 to March 2024)	1.6%* N.B. The lower the % the better
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* an additional 9 months is given to 31 December to allow for the receipt of appeal decisions.

** One appeal is being disputed with MHCLG and the outcome is awaited.

These statistics demonstrate the soundness of decision making by Planning Development Management (PDM) and that unsound decisions are not being made which would lead to unnecessary delays and costs to the delivery of new homes. However, close monitoring of the quality assessment for major applications is continuous due to the relatively small number of major applications received and the risk that the LPA could be the subject of Designation by Central Government. If this occurs, applicants may apply directly to the Planning Inspectorate for permission.

Housing delivery challenges

- 2.13 In the 1990s, the Council used to provide traditional council housing. However in 1996, it was decided to transfer the council housing stock to what was then Spelthorne Housing Association and is now part of A2 Dominion. The main reason for the transfer of properties at the time was the need to bring the properties up to an acceptable state of repair, which was best done by an affordable housing provider. Since then, the Council has had a direct role in developing new homes, for e.g., The West Wing at Knowle Green, Benwell House, Churchill Hall and the former Bugle PH – see table 3 below. Fluctuation in the delivery of new housing has been dictated by the economy and the availability of grant funding to subsidise affordable housing. The lack of affordable homes being provided in Spelthorne is a severe problem in Spelthorne and has become acute in recent years.
- 2.14 The Council's Housing, Homelessness and Roughsleeping Strategy 2025 - 2030 contains three strategic priorities which contribute to achieving "residents having somewhere to call home, which is suitable and affordable, is fundamental to having a good quality of life and contributes directly to sustainable and cohesive communities."
- 2.15 In common with many other local authorities in the South East, Spelthorne has a growing demand for genuinely affordable housing and is facing a number of key challenges. These include:
- Increasing numbers on the Housing Register (currently over 2,600)
 - Lack of availability of existing affordable housing
 - High rates of statutory homelessness
 - High use of emergency and temporary housing for homeless households
 - Increasing affordability issues (pay not keeping up with house prices)
 - Affordable rented (80% of market rent) does not meet the needs of our residents

- Lack of new-build affordable housing (only 324 affordable units delivered via s106 agreements in last 5 years).
- Private sector landlords exiting the market due to upcoming changes in legislation, creating additional accommodation pressure
- The effect of our proximity to London
- Issues around viability of new affordable housing delivery
- Impact of immigration on housing demand in the area
- Key worker accommodation
- Impact post COVID-19
- Wider economic impacts in relation to housebuilding (construction costs, interest rates)

2.16 Further details on the key challenges are contained in Information Document 3 at Appendix 3.

3. Action Plan

- 3.1 This section sets out the actions that the Council has already taken to increase housing delivery and the future actions required to continue this work. The Council is fully committed to working proactively to deliver the homes that Spelthorne needs, including a range of housing types and affordable housing.
- 3.2 It is acknowledged that the delivery of new homes has a wider remit than just the Planning Service and requires actions to be undertaken by other Council services including the Housing Service and the Asset and Property Management Service.

What the Council has already done

The New Local Plan

- 3.3 The need for an up-to-date Local Plan is a corporate priority and will assist in boosting the borough's housing supply as well as responding to housing needs, whilst balancing the objectives in the Local Plan, including Green Belt and environmental protection.
- 3.4 The Council submitted its draft Local Plan to the Secretary of State for Levelling up, Homes and Communities for independent inspection on 25 November 2022. As submitted, the Local Plan sought to meet the Borough's development needs through a combination of intensifying development of brownfield land, growth within Staines-upon-Thames and releasing a small amount of Green Belt (0.7%) to provide family housing. The first three hearings were held on 23 – 25 May 2023, and a further six dates were planned for June 2023. Following an Extraordinary Council Meeting on 6 June 2023, where a motion was agreed to pause the remainder of the Local Plan examination hearings, the examination was paused.
- 3.5 Another Extraordinary Council Meeting was held on 14 September to consider a report which outlined three options on the future of the Local Plan. At the start of the meeting, a letter from the Minister of State for Housing and Planning was read out which outlined the Governments concerns that the Council may withdraw the emerging Local Plan from examination. This has resulted in the Government intervening in the Local Plan process under section 27 of the Planning and Compulsory Purchase Act 2004.
- 3.6 Following this, Councillors voted to extend the pause in the Examination timetable until the proposed changes to the National Planning Policy Framework had been published before determining the next steps. The revised National Planning Policy Framework was published on 19 December 2023. Subsequently, at Environment and Sustainability Committee on 29 February 2024, the Committee resolved to propose to the Inspector to:
- Remove all Green Belt allocations from the Local Plan with the exception of the two allocations that meet the need for Gypsy, Traveller and Travelling Showpeople.
 - Keep all proposed flood risk sites but remove those at high risk of flooding and move some higher risk sites to later in the Plan period (11-15 years) to

allow the River Thames Scheme to be operational and effective, the design code to be completed, and subject to no resolute objection from the Environment Agency.

- Withdraw the Staines Development Framework as a core document.

- 3.7 The Council wrote to the Inspector on 6 March 2024 to make him aware.
- 3.8 In a meeting of Council on 18 July 2024 it was resolved that, in addition to what was resolved in the Corporate Policy & Resources Committee on 29 February 2024, to request a modification to add wording to the policies of the site allocations that are at risk from access and egress flooding issues.
- 3.9 On the 14 October 2024 SBC and the Environment Agency signed a statement of common ground (SOCG). The SOCG sets out agreement regarding what is the most appropriate modelling to be used in the Strategic Flood Risk Assessment, the Councils commitment to produce a Supplementary Planning Document or Supplementary Plan and agreed rewording of policy E3: Managing Flood Risk to be requested as a modification to the Inspector.
- 3.10 At a meeting on 24 October 2024 the Council resolved to:
1. Note that the Environmental Agency had signed a SoCG,
 2. Agree to keep the Green Belt allocations in the Local Plan as submitted to the Planning Inspectorate on 25 November 2022
 3. Agree to delegate authority to the Group Head of Place, Protection and Prosperity in consultation with the Chair of the Environment and Sustainability Committee, to undertake any further consultation required by the Planning Inspector; and
 4. Agree to delegate authority to the Group Head of Place, Protection and Prosperity in consultation with the Chair of the Environment and Sustainability Committee, to prepare a main modification to the Local Plan, for the new policy on 'Local Plan Early Review'.
- 3.11 Following the meeting of Council on the 24th of October the Chair of the Environment and Sustainability Committee, wrote a letter to the Planning Inspector to inform him of the outcome of the meeting and to request the resumption of the Local Plan Examination.
- 3.12 On 12 December 2024 the Council published the Notice of Examination Hearings resuming in January 2025 and included a series of documents on the Examination Website, providing up-to-date information for stakeholders, to support the hearings.
- 3.13 The Examination Hearings resumed on the 28 January 2025 and concluded on the 18 February 2025. Following this the Local Plan has now progressed to a Main Modifications Consultation which is live until the 15 May 2025. It is anticipated that the Local Plan will be formally adopted Autumn 2025.
- 3.14 As a result of the examination hearings, the Council is proposing through the Main Modifications to include an Immediate Review Policy which commits to producing an updated or replacement plan which will be submitted for examination no later than two years from the date of adoption of this Local Plan. The Immediate Review will consider the housing requirement for the whole Borough based on the most up to-date national guidance and monitor housing delivery, including the progress and

implementation of sites to inform the review.

- 3.15 The adoption of the new Local Plan will support the delivery of new homes in the borough, through the allocation of development sites and the release of Green Belt for family homes. The new Local Plan projects the delivery of almost 10,000 homes up to 2039, although given the nature of the Housing Delivery Test, which takes an average of the past three years of housing delivery, it may take some time for the impact of the new Local Plan to be filter down into the results of the HDT.

Digital Engagement

- 3.16 The key change to consultation techniques is reaching out to our communities through digital engagement. Although traditional methods are still being used the majority of engagement is now done via online communication which has proven more effective and engaging in promoting planning policy consultations and opportunities to discuss major planning applications.
- 3.17 The Council uses its social media platforms to provide information and notifications regarding planning consultations and schemes. The 'Inovem' platform has been used to consult the public on various planning consultations, including the Local Plan Regulation 19 consultation. The Council continues to write to all adjoining properties of a planning application received. Whilst this is done via traditional mail (as the email addresses are not known), all subsequent correspondence is electronic using *Idox Uniform.

Delivery using Council Assets

- 3.18 The previous Housing Strategy 2020-25 set out an action plan on the delivery and monitoring of the strategy. These included enabling the delivery of more affordable homes, promoting independence and wellbeing to enable people to remain in their homes and preventing homelessness and rough sleeping. The strategy plan of actions has been delivered and the housing team analysed data which formed the basis for the new Housing, Homelessness and Rough Sleeping Strategy 2025-30. The housing service is under extensive pressure and experiences high demand for temporary accommodation and affordable housing provision. The new strategy seeks to address the affordable housing demand in the borough and to assist those sleeping rough.
- 3.19 The Council's Capital Strategy states that it will help to deliver two key goals contained in the Corporate Plan:

- To deliver much-needed housing in order to help reduce homelessness locally, increase affordable provision and help meet the overall need for additional homes.
- To regenerate our town centres so that we can contribute to the economic development of the Borough.

- 3.19 The Council formed its housing company, Knowle Green Estates (KGE), in 2016. KGE identified a need to promote the Council's own affordable housing schemes, and KGE is the vehicle used to deliver them to residents. However in Autumn 2023 Spelthorne Borough Council (SBC) took a decision not to undertake any direct development. Nevertheless, due to historical failure by the private sector to deliver affordable homes, affordable housing continues to be a Council Corporate Priority and SBC remains focused on how it can assist in improving the supply of affordable, social and keyworker and private rental homes to address the needs of residents identified in the Council's Housing Strategy.
- 3.20 The Council adopted a Development Delivery Strategy in October 2024 that will set some parameters to support the delivery of new housing on several of our sites via partnership arrangements with external organisations. Each site will be assessed individually with a bespoke delivery approach and objectives, which will be determined on the specifics of the site i.e. size, location, surrounding buildings, demographics.
- 3.21 Part of the development strategy includes an indicative site prioritisation list which categorises sites into short, medium and long term priorities. The site categorisation has been prioritised on a number of factors, one being to bring forward sites in conjunction with the policies and timescales in the Borough Local Plan which is anticipated to mean some of the sites will not actually be delivered until the latter part of the plan period. The Council sites will be openly marketed and/or partners procured to ensure full transparency within decision making around delivery options. The table below covers all housing developments delivered by the Council and managed by KGE.

Table 3 SBC Housing Developments

Site	App. No.	Dwellings	Occupation Date
Churchill Hall, Churchill Way, Sunbury on Thames	16/02045/FUL	Feb 2019 3 rented dwellings	28/09/18
Former Bugle PH, 73 Upper Halliford Road, Shepperton	17/01028/FUL	6 no. 2 bed and 2 no. 1 bed flats	Feb 2019
Benwell House, Green St, Staines (now owned by KGE)	17/01847/PDO	7 units including 12 affordable units 22 x one bed, 35 x 2 bed	April 2021

West Wing, Council Offices, Knowle Green, Staines TW18 1BX	18/01267/PDO	25 affordable rented residential units	Occupied: December- 2021 - February 2022 (fully occupied).
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Improved Decision Making

- 3.16 The Planning DM service has undertaken a number of initiatives to improve decision making and boost the timely delivery of housing. These include:

Offering more pre-application discussions to ensure issues are addressed early.

The Planning DM Officers regularly undertake pre-application advice. In 2024 a total of 276 planning enquiries were dealt with. Early advice can help identify whether in principle a proposal is likely to be acceptable, the key planning issues and policies that need to be considered, where the applicant may need further specialist advice to help prepare the application and what changes may be needed to any draft proposals. Such advice can save an applicant time in preparing the application and also the time taken by the Council to make a decision on it. In the case of proposals with little prospect of approval, early advice can avoid further abortive work. A good pre-application service will have a strong emphasis on front loading to reduce the time spent on decision making and use of planning conditions. This means a quicker turnaround can be achieved which subsequently can lead to the faster implementation of planning permissions for housing delivery. Some examples of development which were the subject of pre-application advice and which were amended and approved relatively quickly are: Wheatsheaf PH, Park Road, Stanwell 22/01417/FUL for 5 units, (16-18 High Street, Staines (23/01493/FUL) for 6 flats, the Renshaw development for 391 flats (22/00591/FUL), the Sunbury Cross Ex-Services Association Club, Sunbury for 47 flats (21/01801/FUL) and the Artrium, 31 - 37 Church Road Ashford for 9 flats (24/00832/FUL).

Use of Planning Performance Agreements

The Council offers planning performance agreements (PPAs) for major development proposals, which often involve a large quantum of housing units. This is one of the factors that might otherwise put developers off putting in an application in the borough. However, it gives absolutely no guarantee that the application will be recommended for approval. In previous years, the Planning DM service has received a positive take up on PPAs for larger schemes, for example, Shepperton Studios. A PPA covers pre-application advice through to the planning decision being made. It sets out timescales within which meetings will take place and a report will be presented to the Planning Committee which gives the developer certainty around timeframes for a decision. They have enabled the DM planning officers to make use of expert advisors to assist on complex issues in the consideration of the planning. Whilst no PPAs have been agreed in the past year, officers will continue to

push for these with developers on larger or complex schemes.

Revised Website

The planning pages of the website are constantly under review and recent changes have been undertaken to reflect new news, procedures and legislation. The DM service received a government grant last year to assist in improving the ICT experience. Work has been taking place on various internal changes to enable new TPOs to be processed digitally and additional work is being planned for this year. This will help residents, applicants and third parties obtain up to date information about all aspects of the Planning Service.

Consultations on Emerging Planning Proposals

In March 2022, the Consultations on Emerging Planning Proposals guidance was agreed by the Corporate Policy and Resources Committee (CPRC). This was updated and agreed by the Environment and Sustainability Committee on 18 June 2024. The guidance advises developers to undertake early engagement with the Community (including ward councillors) on the larger development proposals before submitting their applications to the Local Planning Authority. This follows guidance in the NPPF at paragraph 39 which advises that 'early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality preapplication discussion enables better coordination between public and private resources and improved outcomes for the community'. The advice in this process has been taken on board by some applicants. This process is being monitored to assess its impact and the first monitoring report was considered by the E&S Committee in June 2024.

Presentations to Councillors on major planning applications

Presentations to members on larger complex schemes, usually at the pre-application stage, have taken place a number of times over recent years. These enable Councillors to view the proposals at an early stage before they are made public, to ask questions and clarify issues and raise concerns, which need to be addressed. To avoid risk of pre-determination, Councillors do not give an opinion at the meetings. Whilst there have been none over the past year, Planning DM officers do have a procedure to make presentations to Councillors on complex planning applications after the Planning Committee agenda is made public and before the Committee meeting. This gives the Councillors an opportunity to receive a full explanation of proposals and a summary of the planning position, to ask questions and to seek clarification on issues but not to reach a decision.

The Community Infrastructure Levy (CIL)

The Community Infrastructure Levy (CIL) was implemented on 01 April 2015. CIL allows the Council to raise funds from some forms of new development to contribute towards both local and strategic infrastructure, to support development in the Borough. The management of the CIL process is the responsibility of the Council's Infrastructure Delivery Coordinator. The Council has a part time CIL administrator to resource the collection process, allowing the Infrastructure Delivery Coordinator to focus on the governance of spending the Levy and coordinating spending alongside the implementation of the Council's new Local Plan. In 2019 the Council purchased new dedicated CIL software (Exacom) which has improved the monitoring of CIL

and s106 agreements. Moving forward it will be important for the Council to ensure that adequate infrastructure is in place to support the delivery of housing. The Infrastructure Delivery Plan (IDP), which is a live document, assesses the existing infrastructure provision, the current shortfall and identifies the existing and future needs and demands for the borough to support new development and a growing population.

Considering compulsory purchase powers to unlock suitable housing sites

The Council has the option to utilise Compulsory Purchase Powers to help unlock potential development sites. In Staines town centre the Council has worked with developers to help unlock areas of land to enable larger schemes. Developers acquired 15 London Road (adjacent to the 17-15 Berkeley Homes site) and planning permission granted to incorporate this small site into the Berkeleys' scheme. This is currently nearing completion. Other developers were previously actively seeking to acquire 116-120 High Street (adjacent to the Charter Square development), following the Council's engagement but the planning application was refused permission and dismissed on appeal. Part 4 of the Planning and Infrastructure Bill 2025 has introduced significant reforms to compulsory purchase powers and process in the UK. The key aim is to expedite infrastructure development and create a simpler process for land acquisition, which will enable authorities to make greater use of their compulsory purchase powers. For registered providers, these changes could allow a more efficient process for land acquisition. Once the proposals have become law, the Council will have the opportunity to engage in compulsory purchase to assist housing delivery.

Using Brownfield Registers to grant permission in principle to previously developed land

Spelthorne publishes an updated brownfield register annually. This identifies all brownfield sites appropriate for residential development. The register includes relevant sites that have been submitted through Spelthorne's Strategic Land Availability Assessment (SLAA) or appropriate sites which meet the criteria. The Council will also consider in due course whether any of the sites will be moved to Part 2 of the Brownfield Register which will effectively grant permission in principle. This will need further consideration and would be the subject of a prior consultation process.

Encouraging the development of small sites and higher site densities

The Council's adopted Core Strategy seeks to encourage high density housing in certain locations under policy HO5. Within Staines Town Centre, development should generally be above 75dph where it is demonstrated that the development complies with the design policy EN1, particularly in terms of its compatibility with the character of the area and is in a location that is accessible by non-car-based modes of travel. Within Staines-Upon-Thames, developments have already been approved at over 300 dph (phases 1A and 1B- former Majestic House Site, now known as London Square) which is complete, 15-51 London Road (Berkeleys scheme), which is under construction, the Renshaw site and the scheme at Elmsleigh Road (Fairview Homes).

Councillor Training on Planning Issues

Planning officers provide regular training seminars to all councillors. A full programme is delivered to councillors following the elections and regular

updates are given throughout their term as councillor. Planning training is also given to new councillors elected part way through the four year term. The training has covered the following areas:

- Planning in the Borough context and the role of the Planning Committee.
- Probity, predetermination and predisposition in planning
- The Planning Code
- Decision making
- Design in the planning process
- Planning enforcement and appeals
- How to approach the determination of planning applications and pitfalls
- Green Belt (two sessions)
- Flooding
- Permitted Development
- Use Classes Order
- Minerals
- County planning
- Transportation
- Planning and Infrastructure Bill 2025

Planning Officer Training

Planning and Enforcement Officers undertake regular training on a range of planning issues and other matters where relevant in order to keep abreast of developments, many of these are undertaken online since Covid lockdown. This particularly relates to new legislation and procedures. This will continue to be an on-going and necessary requirement of their jobs and for some officers, their membership of the Royal Town Planning Institute.

Simplifying conditions discharge phased on approved sites, and standardised conditions reviewed

A review of all planning conditions was previously undertaken by senior planning officers. This has resulted in the streamlining of conditions to ensure that they meet up to date guidance on the use of conditions and to safeguard against their use where other non-planning legislation would be more appropriately employed. Conditions are constantly being reviewed and updated where appropriate to improve the planning process.

Ensuring evidence on a particular site is informed by an understanding of viability

The Council's Local Plan requires all proposals of 15 dwellings or more and all sites in excess of 0.5 hectares include to provide 50% affordable housing. Where developments fall short of this requirement, an independent viability assessment would be submitted and assessed on an open book basis. This is a complex area where specialist advice is required, and planning officers and councillors have undergone training on this.

Technology

Over the past few years, the Planning DM section has accelerated its use of technology in the processing of planning applications. This includes:

- No paper files, all processing is via the Idox Uniform IT system.
- The use of Idox Enterprise for the “in-tray” process of processing the cases.
- All decision notices are automatically emailed to the applicant.
- All correspondence is sent electronically (except where an email address is not available).

This is under constant review with improvements in processes as and when new procedures and legislation are introduced. So far, the government grant has been used to improve our online data, e.g., tree preservation orders (TPO) to enable the data to be easily available and for the making of TPOs to be streamlined. The use of technology has greatly assisted in processing applications more quickly by removing all paperbased files and using technology for all means of file sharing and communication (except the initial neighbour notification on planning applications).

4 Future Actions

- 4.1 The Council will continue to positively look for further opportunities to increase its housing delivery and will work closely with the relevant Council services and external organisations to achieve this.

Local Plan Progress

- 4.2 As part of the new Local Plan the Council will seek to boost housing supply and delivery. The new Local Plan will review and update existing policies to ensure sustainable development comes forward.
- 4.3 The Strategic Land Availability Assessment (SLAA) is a key piece of evidence for the new Local Plan and will be updated on a regular basis to ensure that the position on land supply is up to date. The Council is in the process of updating the SLAA for the current year. In line with Planning Practice Guidance, officers are proactively identifying sites, including publicly owned land and brownfield land, for development to ensure that potential supply is exhausted. The Council has an open-ended call for sites on its website whereby landowners or site promoters can submit potential development sites for consideration in the next iteration of the SLAA¹.
- 4.4 The SLAA informs the policies on housing in the new Local Plan and acts as the starting point in determining which sites will be allocated. The Council has also produced an updated housing trajectory (Jan 2025) which reflects the most up to date information available. It combines information on past completions, existing planning permissions and identified housing allocations from the new Local Plan to illustrate projected housing supply over the plan period. Moving forward the Council will work with stakeholders to ensure that suitable and available sites come forward at particular points in the plan period.
- 4.5 It is estimated that the five year housing land supply in the Borough is currently

¹ <https://www.spelthorne.gov.uk/SLAA>

3,149 units, this equates to 4.2 years supply.

- 4.6 Upon anticipated adoption in Autumn 2025 the Local Plan will release a further 834 units from the Green Belt at this point it is projected the Council will then have a five-year supply of housing with the Green Belt sites being tested as part of the Local Plan examination.
- 4.7 Of the sites identified in the Housing Trajectory (Jan 2025), approximately 2,506 are expected to come forward within the next 5 years and 1,676 are expected to come forward within the next four years subject to planning permission being granted.

Digital Engagement

- 4.8 The Planning Development Management Service has recently been awarded a grant of £100,000 to enable the service to ensure improved access to planning data. Officers are currently working with the Department of Housing, Communities and Local Government on the programme for spending the grant. Whilst this, in itself, will not speed up housing build out rates, the improved flow of data information will assist developers and the local community in having all the relevant information easily available throughout the planning process. The officers have commenced work on the changes in collaboration with other councils and the completed work is expected around the end of 2025.

Decision Making

- 4.9 Table 7 in Appendix 2 shows, in the final column, the consequences resulting from the Housing Delivery Test for the current year. The consequence is shown to be a housing delivery test below the required 75%, leading to Spelthorne being required to produce an Action Plan. We will also have to apply a 20% buffer to our housing supply and consequently there will be a presumption in favour of sustainable development. This means that planning permission should be granted unless the harm caused by the application significantly outweigh the benefits.
- 4.10 The term tilted balance is used to define this passage of policy because when engaged, the tilted balance should change the 'balancing exercise' which the decision-taker (the planning officer, inspector or secretary of state) makes when deciding whether or not to grant planning permission; from a neutral balance where if the harms outweigh the benefits planning permission is usually withheld, to a tilted balance where the harms should *significantly and demonstrably* outweigh the benefits for permission to be withheld. Similarly on planning appeals, inspectors will give due regard to the presence of the presumption in favour of sustainable development. This means that on balance, a greater number of appeals may be allowed. This highlights the importance of not only boosting housing delivery but of having an up-to-date Local Plan to ensure that needs can be met through the identified supply.

- 4.11 The Council is also exploring and investigating the potential options for Local Development Orders (LDOs) in supporting housing delivery. LDOs are a planning tool introduced by the Government in 2004 intended to simplify and accelerate the planning process for specific types of development in defined areas.
- 4.12 The table below shows a projection of the number of homes required and the anticipated number of homes delivered by 2024. The information set out provides a conservative estimate of delivery based on average completions over the previous three years. This does not take into account the measures proposed by the Council to boost housing delivery, such as the Local Plan or Development Management controls. Anticipated completions are therefore expected to be higher than the very cautious estimate below.

Table 4 Spelthorne – Housing Delivery Test 2025 projected result

No of homes required			Total homes required	No of homes delivered			Total homes delivered	HDT Test %	Consequence
2022-2023	2023-2024	2024-2025		2022-2023	2023-2024	2024-2025			
611	618	631	1,860	138	287	206	631	34%	Action Plan + 20% Buffer + Presumption

Table 5 Improving Decision Making

Action	Service	Date
To review the standard planning conditions.	Planning Development Management	Ongoing
To continue to review the discharge of planning conditions to speed up the process.	Planning Development Management	Ongoing
To continue to liaise with applicants following planning permission to speed up procedures and to implement service improvements especially the discharge of planning conditions, to enable an early start on site as possible.	Planning Development Management	Ongoing
To review and monitor the impact of reverting back to the three year statutory time period on planning permissions.	Planning Development Management	Ongoing
To continue to improve planning performance on speed of decision making (currently at 99% - 100%)	Planning Development Management	Ongoing
To continue to improve planning performance on quality of decision making.	Planning Development Management	Ongoing

To continue to improve the way of working in respect of planning conditions.	Planning Development Management Environmental Health	Ongoing
To continue to provide ongoing Member training particularly in relation to housing delivery.	Planning Development Management	Ongoing
To continue to provide on-going planning officer training.	Planning Development Management	Ongoing
To continually refine the programme of improving data provision in Planning DM.	Planning Development Management	Ongoing
To further refine data improvement and the programme of Enterprise measures for DM staff to manage workloads and performance, improve the use of resources and efficiency / performance.	Planning Development Management	Ongoing
To continue to develop and offer a proactive pre-application service to support the delivery of sustainable development.	Planning Development Management	Ongoing

Table 6 Supporting Wider Housing Opportunities

Action	Service	Date
To continue dialogue with developers and landowners to build out rates and obtain information on barriers to deliver housing.	Strategic Planning	On-going
To work with site promoters and other stakeholders to deliver the Local Plan and site allocations.	Strategic Planning	On-going

Action	Service	Date
To continue to seek to achieve the maximum amount of affordable housing.	Planning Development Management Housing Strategy	On-going
To facilitate the delivery of housing on several Council sites via partnership arrangements with external organisations	Assets	On-going
CIL and S106 agreements – To continue to improve processes and improve monitoring.	Strategic Planning	On-going. Exacom software will assist in processing information.

Next Steps

- 4.13 The future actions identified will be implemented and monitored over the next year by Planning DM, Strategic Planning, Assets and Housing Strategy. The Housing Delivery Test results will be issued for each authority on a rolling annual basis. If Spelthorne does not meet the test in future years, Housing Delivery Test Action Plans will continue to be produced by Planning Development Management.
- 4.14 This Action Plan will be reported to the Planning Committee for information.
- 4.15 The Council welcomes any suggestions to improve the delivery of housing in Spelthorne.
- 4.16 It is proposed that this plan will be made publicly available on the Council's website.

Esmé Spinks
Planning Development
Manager

Jane Robinson
Interim Strategic Planning Manager

Spelthorne Borough Council, April 2025

Information Document 1**1. Planning Policy Context**National Policy

- 1.1 The Government is committed to levelling up across the country, building more homes to increase home ownership, empowering communities to make better places, restoring local pride and regenerating towns and cities. The issue over housing delivery and any possible changes to the current methodology of housing provision for local planning authorities (currently calculated at 631 dwellings per year) has been the subject of much debate in the planning press. On 11 March 2025, the Planning and Infrastructure Bill was introduced to Parliament. The Bill is a key tool in the government's plans to build 1.5m homes and proposes various reforms, including those around compulsory purchase orders, strategic planning and development corporations. It is presently passing through parliamentary procedures having passed through two readings.
- 1.2 The Government, has subsequently, reinforced its objective to significantly boost the supply of new homes and making the local authority more accountable for delivery in their area by publishing the following:
 - A revised National Planning Policy Framework (NPPF) December 2024
 - Planning Practice Guidance (PPG) on Housing Supply and Delivery December 2024
 - Housing and economic needs assessment, February 2025
 - Planning and Infrastructure Bill, March 2025
- 1.3 The methodology for calculating the Housing Delivery Test is set out in the Housing Delivery Test Measurement Rule Book 2024. It measures the number of net homes delivered against the number of homes required over a rolling three year period.
- 1.4 The Government is, therefore, committed to the significantly boosting the delivery of more new homes nationally through their economic and housing growth agendas. To this end they have introduced a number of measures and reforms to the planning system intended to deliver more housing, improve housing affordability and remove barriers to development. Local planning authorities (LPAs) are challenged to be more proactive in increasing the speed and quantity of housing supply to meet the identified housing needs of their local area.

Information Document 2

2. Housing Delivery Analysis

- 2.1 The Housing Delivery Test (HDT) was introduced by the Government in 2018 as a monitoring tool to demonstrate whether local areas are building enough homes to meet their housing need. The HDT, which was published in December 2024 updates the previous result published in January 2023. This compares the number of new homes delivered over the previous three years with the authority's housing requirement. In the case of Spelthorne, the housing requirement is the minimum annual local housing need figure (631 dwellings per annum as of April 2025). The calculation is given as:

$$HDT(\%) = \frac{\text{Total net homes delivered over three year period}}{\text{Total number of homes required over three year period}}$$

2.2 The HDT will be used to determine the buffer to apply in housing supply assessments and whether the presumption in favour of sustainable development should apply. The HDT has the following consequences:

- Where housing delivery over the previous three years has been less than 95% of the housing requirement, LPAs should prepare an action plan setting out the causes of under delivery and the intended actions to increase delivery;
- Where delivery has been less than 85% of the housing requirement, a 20% buffer should be applied to the supply of deliverable sites for the purposes of housing delivery assessment;
- Where delivery has been less than 75% of the housing requirement, the NPPFs presumption in favour of sustainable development will apply.

2.3 In the 2023 HDT measurement, published in Dec 2024, there were 59 councils below 75% and consequently now face the 'presumption in favour of sustainable development'. The 2023 housing delivery test figure for Spelthorne is 61%, meaning it now faces this consequence. This calculation is based on the data set out in Table 7.

Table 7 Spelthorne – Housing Delivery Test: 2023 Measurement (published December 2024)

No of home required			Total homes required	No of homes delivered			Total homes delivered	HDT Test %	Consequence
2020-2021	2021-2022	2022-2023		2020-2021	2021-2022	2022-2023			
403	611	618	1632	518	336	138	992	61%	Presumption in favour of development

- 2.4 As a consequence, Spelthorne is required to produce an Action Plan within a period of 6 months of publication of the Housing Delivery Test measurement.
- 2.5 Spelthorne Borough Council (SBC) is responding to this challenge and has the ambition, recognised across its key strategic documents, to increase and accelerate the delivery of new housing across the district. The allocation of land to accommodate a minimum of 9,465 new homes (631 dwellings per annum) is being made through the emerging Local Plan, which completed its Examination Hearings in February 2025. Following this the Local Plan has now progressed to a Main Modifications Consultation which is live until the 15 May 2025. It is anticipated that the Local Plan will be formally adopted Autumn 2025.
- 2.6 As a result of the examination hearings the Council is proposing through the Main Modifications to include an Immediate Review Policy which commits to producing an updated or replacement plan which will be submitted for examination no later than two years from the date of adoption of this Local Plan. The Immediate Review will consider the housing requirement for the whole Borough based on the most up to-date national guidance and monitor housing delivery including the progress and implementation of sites to inform the review.
- 2.7 The PPG advises that:
- “The action plan is produced by the local planning authority where delivery is below 95% of their housing requirement. It will identify the reasons for under-delivery, explore ways to reduce the risk of further under-delivery and set out measures the authority intends to take to improve levels of delivery.”*
- 2.8 The table on the following page sets out the position for all Surrey boroughs and districts. It can be seen that at present six out of the eleven authorities are required to produce a housing delivery action plan. The possible consequences are based on the following:
- 95% = Action Plan
 - 85% = Action Plan + 20% buffer
 - 75% = Action Plan + 20% buffer + presumption in favour of development

Table 8 Surrey Local Authorities – Housing Delivery Test 2024

Local Authority	No of homes Required			Total Homes required	No. of homes delivered			Total Homes Delivered	HDT Test %	Current Consequence 2022 HDT Measurement
	2020-2021	2021-2022	2022-2023		2020-2021	2021-2022	2022-2023			
Elmbridge	421	641	647	1709	346	768	240	1354	79%	20% Buffer + Action Plan
Epsom and Ewell	384	577	576	1537	142	117	317	576	38%	Presumption + 20% Buffer + Action Plan
Guildford	374	562	562	1499	857	738	704	2300	153%	None
Mole Valley	226	339	339	903	244	248	217	709	78%	20% Buffer + Action Plan
Reigate and Banstead	310	461	461	1232	820	728	686	2234	181%	None
Runnymede	340	511	509	1361	390	557	598	1546	114%	None
Spelthorne	403	611	618	1632	518	336	138	992	61%	Presumption + 20% buffer + Action Plan
Surrey Heath	191	286	283	761	395	370	403	1168	153%	None
Tandridge	430	644	642	1716	162	246	308	716	42%	Presumption + 20% Buffer + Action Plan
Waverley	394	592	617	1603	682	823	969	2475	154%	None
Woking	232	4346	361	939	176	386	649	1211	129%	20% Buffer + Action Plan

- 2.9 Where there is a presumption in favour of development, the “tilted balance” applies where the balance is skewed in favour of sustainable development and granting planning permission except where the benefits are ‘significantly and demonstrably’ outweighed by the adverse impacts or where specific policies in the National Planning Policy Framework (NPPF) indicate otherwise. The “tilted balance” also applies where there is the absence of relevant up to date development plan policies or where the local authority does not have a five year housing land supply which is presently the case for Spelthorne.
- 2.10 The tilted balance therefore increases the prospect of planning permission being granted because it ‘tilts’ the balance in favour of approving an application.

Spelthorne’s Current Housing Land Supply Position

- 2.11 The Council’s housing target based on our local housing need is currently 631 dwellings per annum as of April 2024 and this comprises the basis for calculating the five-year supply of deliverable sites. In using the local housing need figure of 631 as the starting point for the calculation of a five year supply, it must be borne in mind that this does not represent a target as it is based on unconstrained need. The Council is planning to meet the local housing need figure of 631 homes per annum through its emerging Local Plan. The Strategic Land Availability Assessment and Housing Trajectory are updated regularly to consider all suitable, available and achievable land in the Borough to help meet development needs.
- 2.12 The Council has assessed the availability of housing in its Strategic Land Availability Assessment (SLAA) 2022. The Authority Monitoring Report (AMR) 2024 contains a housing trajectory and it is this that has been used as the baseline to inform the supply of sites. There has, however, been some updates to some of the sites and figures following consultation with the Councils Development Management and the Assets teams with the most recent Housing Trajectory being published in January 2025.
- 2.13 Due to the requirement set out in paragraph 79 of the NPPF to apply a buffer of 20% where there has been under delivery of housing over the previous three years, the local need housing figure is 757 (631 + 20% buffer) dwellings per annum. The effect of this increased requirement is that the identified sites only represent some 4.2 years supply and accordingly the Council cannot, at present, demonstrate a five year supply of deliverable housing sites. However, upon anticipated adoption in Autumn 2025 the Local Plan will release a further 834 units from the Green Belt at this point it is projected the Council will then have a five year supply of housing with the Green Belt sites being tested as part of the Local Plan examination.
- 2.14 As a result, current decisions on planning applications for housing development need to be based on the “presumption in favour of sustainable development ” approach as set out in paragraph 79 of the NPPF (2024) as referred to above.

Table 9 Spelthorne's Housing Land Supply Position

Five Year Supply Position	
Need April 24 – March 29 = $(5 \times 631) =$	3155
Buffer at 20% = $(3155 \times 1.2) =$	3786
Annual need including 20% buffer =	757
Projected 5 year supply =	3149
Housing supply $(3149 / 3786 \times 5) =$	4.2 years of supply

Spelthorne's Housing Performance

- 2.15 A large proportion of the existing housing stock was built between 1920 and 1970. A very high proportion is owner-occupied and comprises mainly detached, semi-detached and terraced housing. The 2021 Census indicates that approximately 13% of the stock is social housing managed by Registered Social Landlords (RSLs) with a similar amount of private rented accommodation. Some 2% of the stock is vacant. The Housing completions (net) by sector April 2009-March 2024 is set out in Appendix 4 Table 19.
- 2.16 House prices have continued to fluctuate. Table 10 illustrates changes in annual average (median) house prices over the last eleven years according to latest available data. Data on house prices is derived from actual sale prices which can show significant variation over time, particularly when the total volume of sales is small. The information should therefore be seen only as a guide to relative movement in house prices by type.
- 2.17 All affordable housing for rent is managed by RSLs and for each scheme granted planning permission the Council initially has 100% nomination rights for first lets with 75% thereafter. One important contextual indicator relating to the achievement of affordable housing policies is the size and composition of the Housing Register. Since 2009 the Council has operated a Choice Based Lettings scheme which significantly extends the opportunities for families on the Housing Register.

Table 10 Average House Prices in Spelthorne by type of dwelling

	Type of Dwelling			
	Detached	Semi-detached	Terraced	Flat/Maisonette
March 2013	£413,453	£288,940	£235,190	£167,183
March 2014	£452,436	£316,491	£257,380	£182,821
March 2015	£516,173	£361,784	£293,173	£208,525
March 2016	£592,566	£414,053	£333,480	£234,909

March 2017	£621,268	£430,119	£346,341	£249,377
March 2018	£626,016	£436,594	£350,260	£248,872
March 2019	£623,430	£366,785	£346,192	£242,583
March 2020	£622,124	£436,085	£348,964	£238,159
March 2021	£650,856	£454,713	£366,415	£241,539
March 2022	£720,721	£498,707	£394,531	£258,075
March 2023	£791,193	£521,984	£413,094	£262,032
March 2024	£744,681	£496,331	£397,435	£267,250
% change 2013-2024	80%	72%	69%	60%

Source: <http://landregistry.data.gov.uk/app/ukhpi/explore>²

² The average house prices figures used within the Housing Delivery Test Action Plan are taken from the UK House Price Index which is on the Land Registry Government website (<http://landregistry.data.gov.uk/app/ukhpi/explore>). Here you can source a variety of house price statistics, such as the average house price by property type e.g. detached houses / flats and maisonettes and percentage change (yearly) by type of property. The average prices above are at the average for the whole Borough.

Projecting future provision

2.18 The housing trajectory (Table 11) shows housing completions for the last seven years and anticipated delivery for the next 15 years to 2039/40. It combines information on past completions, existing planning permissions and identified housing sites from the Strategic Land Availability Assessment 2022 to illustrate projected housing supply going forward into the new Local Plan period. Table 11 is based on monitoring information collected in 2023/24 with monitoring data for 2024/25 in the process of being formalised and will inform the next iteration of the plan.

2.19 Net completions for the previous seven years are recorded and broken down into four categories – conversions, change of use, small sites with fewer than 5 dwellings (net) and large sites of 5 or more dwellings (net). Data on housing completions by bedroom are set out in Table 11. Data for projected completions in future years is recorded on the same basis in Table 11.

Table 11 Draft Housing Trajectory Data 2024-2039/40

	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40
Actual Completions																							
Actual total completions (gross)	287	310	248	656	210	150	306																
Actual total completions (net)	250	289	228	639	205	138	287																
Annual losses	37	21	20	17	5	12	19																
Under construction at start of year	476	1010	1094	982	538	345	1320	1509															
TOTAL SUPPLY																							
Units under construction								738	492	227	0	0	0	0	0	0	0	0	0	0	0	0	0
Extant units not started*								35	183	227	86	48	0	0	0	0	0	0	0	0	0	0	0
Allocations*								0	119	409	523	460	580	469	456	504	409	337	349	303	259	259	259
Brownfield Tier 2*								0	0	18	0	16	153	94	29	0	0	200	157	109	48	23	160
Small sites windfall trend								43	43	43	43	43	43	43	43	43	43	43	43	43	43	43	43
PDO windfall trend								0	0	0	0	0	54	54	54	54	54	36	36	36	36	36	36
TOTAL SUPPLY	250	289	228	639	205	138	287	816	837	924	651	566	830	660	582	601	506	616	584	491	386	361	498
ANNUAL REQUIREMENT																							
Standard Method Annual Requirement								631	631	631	631	631	631	631	631	631	631	631	631	631	631	631	631
Standard Method Annual Requirement plus 20% buffer								757	757	757	757	757											
Annualised Requirement (cumulative)								631	1262	1893	2524	3155	3786	4417	5048	5679	6310	6941	7572	8203	8834	9465	10096
Cumulative completions								816	1653	2577	3228	3794	4625	5285	5867	6467	6973	7588	8173	8664	9050	9411	9909
Years remaining at start of year								16	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1
Residual								9465	8649	7812	6888	6237	5671	4840	4180	3598	2998	2492	1877	1292	415	54	-444
ANNUAL REQUIREMENT taking account of past and projected completions								592	577	558	530	520	516	484	464	450	428	415	375	323	138	27	-444

- 2.20 Anticipated completions for the year 2024/25 are 203. Anticipated completions for the year 2025/26 are 837.
- 2.21 For the period from 2024/25 to 2039/40 the estimated net annual completions are based on the following components:
- Dwellings under construction
 - Dwellings with planning permission (unimplemented)
 - Allocations
 - Sites of 5 or more dwellings identified in the SLAA 2022.
 - Estimates for dwellings provided by conversions, change of use and from small sites (fewer than 5 units net)
- 2.22 Given the past trends in the Borough's implementation rates of planning permissions it has been assumed that most remaining unimplemented permissions will be completed over the next five year period from 2024. However, a small non-implementation factor of 5% has been applied on a precautionary basis to allow for permissions which expire.
- 2.23 Another component of the trajectory is based on estimates and is made up of four elements. The first, dwellings provided by conversion of existing residential properties into smaller units, is calculated from the average annual net provision over seven years. The second element derives from the change of use from non-residential property to residential, such as a shop to a dwelling. Again, the estimate is based on the annual average net provision over a seven year period. Traditionally this was always a small component of the overall total. However, the significant increase in large office to residential conversions as a consequence of the Government's relaxation of planning controls has significantly increased this source of supply which is now estimated separately. It is not known how long this trend will continue, so whilst the trajectory takes account of known schemes, the longer term estimate for this source of dwelling supply remains cautious having regard to current levels of provision.
- 2.24 The fourth element relates to new build dwellings on sites delivering fewer than five dwellings (net). This is the threshold for sites considered to be too small to be reliably identified in the SLAA. Currently there is no evidence from completions data to suggest that this source of new housing is likely to decline over the plan period and the estimate of 43 units per annum is taken from the SLAA and Housing Trajectory Jan 2025. This is based on the average annual net completions figure for the last twelve years and is included in the trajectory in years 5-10 and 10-15.
- 2.25 The final component of supply is that provided by the Housing Trajectory Jan 2025. Every site of 5 or more dwellings listed in the study is assessed on a likely implementation date based on the criteria of whether a site is developable and deliverable over the next fifteen years broken down into three five year periods.

- 2.26 At the time the Local Plan was submitted for Examination, the Council was planning to meet the Local Housing Need derived from the standard method for calculating housing need. The Council was unable to meet its housing needs in the urban area alone, so the release of a small amount of Green Belt was proposed. The Local Plan which was submitted for Examination included a 0.7% release of Green Belt alongside making an efficient use of brownfield land and maximising densities in sustainable locations.
- 2.27 The number of dwellings completed, under construction and with outstanding planning permission at 31 March 2024 is shown in Table 12.

Table 12 Number of dwellings completed, under construction and with outstanding planning permission at 31 March 2024

	Conversion/ Change of Use	Small sites (less than 0.4ha)	Large sites (0.4ha or greater)	Total dwellings – all sites
Gross Completions (2023-24)	130	96	80	306
Losses (2023-2024)	7	12	0	19
Net Completions	123	84	0	287
Units under construction	38	157	1314	1509
Units not started on sites under construction	0	0	0	0
Units with outstanding planning permissions (net)	35	141	31	207
Total units outstanding	73	298	1345	1716

(Source: In house monitoring)

Table 13 Approved and Implemented Residential Development

Year	Schemes approved in year	Units approved in year	Starts this year	Total under construction
2023-2024	54	577	490	1509
2022-2023	57	632	1125	1319
2021-2022	58	443	172	345
2020-2021	52	242	212	538
2019-2020	63	756	138	982
2018-2019	69	998	270	1092
2017-2018	89	1085	821	1010
2016-2017	54	654	411	476
2015-2016	68	581	381	439

2.28 Table 13 shows the rate of approved residential schemes in Spelthorne since 2015-16. This highlights the Council's rate of approval and also shows the number of units started each year by developers. Starts each year are generally much lower than the number of approvals, indicating that whilst the Council is positively responding to the challenge of boosting its role in housing delivery internally, external factors which are beyond the control of the Council will influence the decision to implement a scheme.

Table 14 Housing completions (net) by bedroom April 2009-March 2024

Year	Total Dwellings (Gross)					Losses (ii)					Net Completions					Running Total
	1 bed	2 bed	3 bed	4 bed	Total	1 bed	2 bed	3 bed	4 bed	Total	1 bed	2 bed	3 bed	4 bed	Total	
2009-2010	77	166	26	27	296	2	36	43	4	85	75	130	-17	23	211	211
2010-2011	70	112	19	11	212	3	21	43	6	73	67	91	-24	5	139	350
2011-2012	53	91	90	28	262	3	43	52	5	103	50	48	38	23	159	509
2012-2013	66	98	38	20	222	2	6	42	2	52	64	92	-4	18	170	679
2013-2014	66	98	19	15	198	2	2	1	2	7	64	96	18	13	191	870
2014-2015	79	172	48	34	333	42	8	8	10	68	37	164	40	24	265	1,135
2015-2016	89	166	71	29	355	2	6	31	8	47	87	160	40	21	308	1,443
2016-2017	98	189	50	37	374	6	11	8	2	27	92	178	42	35	347	1,790
2017-2018	108	111	36	32	287	8	12	6	11	37	100	99	30	21	250	2,040
2018-2019	164	92	33	21	310	3	4	8	6	21	161	88	25	15	289	2,329
2019-2020	122	98	20	8	248	1	6	11	2	20	121	92	9	6	228	2,557
2020-2021	294	327	30	5	656	0	6	7	4	17	294	32	23	1	639	3,196
2021-2022	92	114	4	0	210	0	0	5	0	5	92	114	-1	0	205	3401
2022-2023	90	48	7	5	150	0	4	4	4	12	90	44	3	1	138	3539
2023-2024	165	101	18	22	306	1	4	12	2	19	164	97	6	20	287	3,826
2009-2024 (i)	1633	1983	509	294	4419	75	165	281	68	593	1558	1814	228	226	3,826	27,875

(i) Period covered by the Spelthorne Core Strategy and Policies DPD.

(ii) Losses of residential units (through redevelopment, conversion and to other uses) are accounted for in the year in which a development is commenced on the site.

Density

- 2.29 From 2009 to 2024 the average density for all completed schemes was 79 dwellings per hectare. Table 15 shows that there has been a notable increase towards higher density development over the past three years.

Table 15 Percentage of new dwellings on completed sites between 2009 and 2024 at different density ranges.

Year	Sites completed in year	Number of dwellings on completed sites	Average density of completed sites	% of dwellings completed at different density ranges		
				<35	35-75	>75
2009-2010	40	235	63	3%	67%	30%
2010-2011	38	272	64	7%	52%	41%
2011-2012	33	260	39	7%	89%	4%
2012-2013	38	146	44	18%	42%	40%
2013-2014	27	242	55	6%	44%	50%
2014-2015	42	307	65	18%	11%	71%
2015-2016	28	176	76	6%	42%	52%
2016-2017	46	440	51	19%	55%	26%
2017-2018	44	296	50	29%	27%	44%
2018-2019	48	459	66	57%	8%	35%
2019-2020	35	230	71	7%	23%	70%
2020-2021	58	513	134	9%	8%	83%
2021-2022	12	137	190	2%	5%	93%
2022-2023	23	150	148	6%	2%	92%
2023-2024	40	306	95	4%	3%	93%
Total	552	4,169	79			

Source: In house monitoring

Affordable housing

- 2.30 The overall provision of affordable housing has declined in recent years. A few years ago, there was an increasing trend for developers to seek to reduce on-site provision of affordable housing on the grounds of viability and / or to promote off-site provision or an in-lieu financial contribution. However, in more recent years, the level of s106 affordable housing has declined to the extent it is now a severe problem in Spelthorne and does not meet the needs of our residents. Indeed in 2023/24, there were just 43 newly built affordable housing completions in the Borough (see table 16 below). A number of larger schemes have recently been granted planning permission with significantly lower proportions of on-site provision than Policy HO3 seeks to achieve. In addition,

the conversion of offices to residential under the “prior approval” regime has prevented the negotiation of affordable housing in a significant number of schemes.

Table 16 Number of affordable homes provided per year since 2009

Year	Affordable dwellings completed (gross)	Affordable dwellings lost in year	Affordable dwellings completed (net)	Rent		Shared Ownership*		Other/not specified	
				Gross units	%	Gross units	%	Gross units	%
2009-10	99	54	45	64	65	35	35	0	0
2010-11	96	44	52	84	87	12	13	0	0
2011-12	144	59	85	101	70	43	30	0	0
2012-13	63	20	43	51	81	12	19	0	0
2013-14	44	0	44	44	100	0	0	0	0
2014-15	16	43	27	8	50	8	50	0	0
2015-16	138	14	124	82	59	56	41	0	0
2016-17	46	0	46	46	100	0	0	0	0
2017-18	9	0	9	5	55.5	4	44.5	0	0
2018-19	6	0	6	6	100	0	0	0	0
2019-20	0	0	0	0	0	0	0	0	0
2020-21	177	0	177	22	12	155	88	0	0
2021-22	104	0	104	0	0	104	100	0	0
2022-23	0	0	0	0	0	0	0	0	0
2023-24	43	0	43	43	100	0	0	0	0
Total	985	234	751	556	59%	429	46%	0	0

Source: In house monitoring

*** It should be noted that the shared ownership dwellings do not meet the housing needs of those on the housing register.**

Table 17 Affordable dwellings granted planning permission 2023-2024

	Number of sites	Total Dwellings (gross)	Affordable dwellings granted pp	Affordable dwellings as % of all dwellings granted pp
All schemes	60	207	13	6%
Schemes above 15 unit threshold as defined in Policy HO3 ³	3	58	0	0%

Source: In house monitoring

- 2.31 The conversion of offices to residential under the “prior approval” regime has prevented the negotiation of affordable housing in a significant number of schemes. In the year to 31 March 2024, only one dwelling was granted through prior approval applications from 1 application. (Table 18).

Table 18 Prior approval applications granted April 2023-March 2024

Application No	Address	Date Approved	Number of dwellings
23/01273/PDO	Office 6A (First Floor) Araby Corner, 6 High Street, Shepperton, TW17 8DN	14/12/2023	1

The Brownfield Land Register

- 2.32 The National Planning Policy Framework (NPPF) requires councils to encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value. All sites included on the register have been provisionally assessed as meeting the NPPF definition of previously developed land.

- 2.33 To be included, sites must also meet the following:

³ As per national planning guidance (NPPF 2021) this is now applied to schemes of 10 units or more.

1. at least 0.25 hectares in size or capable of supporting at least five dwellings;
 2. "suitable" for residential development;
 3. the land is "available" for residential development; and
 4. residential development of the land is "achievable".
- 2.34 Spelthorne updates its Part 1 Brownfield Register annually. The Register provides up-to-date and consistent information on sites that are considered to be appropriate for residential development as long as they meet the criteria set out in Town and Country Planning (Brownfield Land Registry) Regulations 2017. Registers are in two parts, Part 1 comprises all brownfield sites appropriate for residential development and Part 2 those sites granted permission in principle. The Part 1 Brownfield Land Register includes sites that have planning permission or are allocations in the adopted Local Plan. The register includes relevant sites that have been submitted through Spelthorne's Strategic Land Availability Assessment (SLAA) or appropriate sites which meet the criteria.
- 2.35 The Brownfield Land Register does not affect the status of sites that already have planning permission or are allocated in the adopted Local Plan for development. The inclusion of other sites on the register does not give them any formal status, or grant permission in principle, or in any sense infer that planning permission will be granted for development. The Brownfield Land Register will be subject to periodic review and through ongoing refinement further sites will be added whilst others may be removed.

The New Local Plan

- 2.36 The current review of the Council's Local Plan has identified a need to create around 631 housing units each year over the next 15 years. The Council submitted its draft Local Plan to the Secretary of State for Levelling up, Homes and Communities for independent inspection on 25 November 2022. The Local Plan seeks to meet the Borough's development needs through a combination of intensifying development of brownfield land, growth within Staines-upon-Thames and releasing a small amount of Green Belt (0.7%) to provide family housing.
- 2.37 The first three hearings were held on 23 – 25 May 2023, and a further six dates were planned for June 2023. Following an Extraordinary Council Meeting on 6 June 2023, where a motion was agreed to pause the remainder of the Local Plan examination hearings, the examination was paused.
- 2.38 Another Extraordinary Council Meeting was held on 14 September to consider a report which outlined three options on the future of the Local Plan. At the start of the meeting, a letter from the Minister of State for Housing and Planning was read out which outlined the Governments concerns that the Council may withdraw the emerging Local Plan from

examination. This has resulted in the Government intervening in the Local Plan process under section 27 of the Planning and Compulsory Purchase Act 2004.

- 2.39 Following this, Councillors voted to extend the pause in the Examination timetable until the proposed changes to the National Planning Policy Framework have been published before determining the next steps. The revised National Planning Policy Framework was published on 19 December 2023. Subsequently, at Environment and Sustainability Committee on 29 February 2024, the Committee decided on options regarding Green Belt allocations, flood risk sites and the Staines Development Framework, and wrote to the Inspector on 6 March 2024 to consider the decisions.
- 2.40 The Staines Development Framework was also consulted on alongside the Local Plan. The aim was to provide a structure to shape and transform the town centre. The Development Framework was an important element of the new Local Plan as it set out the opportunities for Staines to deliver new homes, commercial activity and vital infrastructure. At the E&S Committee on 29 February 2024, a decision was made to recommend to the Inspector that the SDF be withdrawn as a Core Document.
- 2.41 In a meeting of Council on 18 July 2024 it was resolved that, in addition to what was resolved in the Corporate Policy & Resources Committee on 29 February 2024, to request a modification to add wording to the policies of the site allocations that are at risk from access and egress flooding issues.
- 2.42 On the 14 October 2024 SBC and the Environment Agency signed a statement of common ground (SOCG). The SOCG sets out agreement regarding what is the most appropriate modelling to be used in the Strategic Flood Risk Assessment, the Councils commitment to produce a Supplementary Planning Document or Supplementary Plan and agreed rewording of policy E3: Managing Flood Risk to be requested as a modification to the Inspector.
- 2.43 At a meeting on 24 October 2024 the Council resolved to:
1. Note that the Environmental Agency had signed a SoCG,
 2. Agree to keep the Green Belt allocations in the Local Plan as submitted to the Planning Inspectorate on 25 November 2022
 3. Agree to delegate authority to the Group Head of Place, Protection and Prosperity in consultation with the Chair of the Environment and Sustainability Committee, to undertake any further consultation required by the Planning Inspector; and
 4. Agree to delegate authority to the Group Head of Place, Protection and Prosperity in consultation with the Chair of the Environment and Sustainability Committee, to prepare a main modification to the Local Plan, for the new policy on 'Local Plan Early Review'.
- 2.44 Following the meeting of Council on the 24th of October the Chair of the Environment and Sustainability Committee, wrote a letter to the Planning Inspector to inform him of the outcome of the meeting and to request the resumption of the Local Plan Examination.

- 2.45 On 12 December 2024 the Council published the Notice of Examination Hearings resuming in January 2025 and included a series of documents on the Examination Website, providing up-to-date information for stakeholders, to support the hearings.
- 2.46 The Examination Hearings resumed on the 28 January 2025 and concluded on the 18 February 2025. Following this the Local Plan has now progressed to a Main Modifications Consultation which is live until the 15 May 2025. It is anticipated that the Local Plan will be formally adopted Autumn 2025.
- 2.47 As a result of the examination hearings, the Council is proposing through the Main Modifications to include an Immediate Review Policy which commits to producing an updated or replacement plan which will be submitted for examination no later than two years from the date of adoption of this Local Plan. The Immediate Review will consider the housing requirement for the whole Borough based on the most up to-date national guidance and monitor housing delivery, including the progress and implementation of sites to inform the review.

Information Document 3

2 Key challenges

The key challenges set out in the following section have been identified as areas for the Council to overcome and to positively address any current barriers to housing delivery. In addressing these challenges, the Council will seek to maintain its high standards and will not compromise on the quality of housing delivered. In addressing these challenges, the Council will have regard to its corporate priorities and will seek betterment for the community.

Increasing numbers on the Housing Register: Over the past three years, the number of applicants on the Council's Housing Register has grown by 79%.

Lack of availability of existing affordable housing: In 2017/18 there were eleven applicants for every social housing vacancy.

High rates of statutory homelessness: There is an average of 116 households for whom we have a duty to provide accommodation per year, with one in five households approaching us due to the termination of a private sector tenancy.

High use of emergency and temporary housing for homeless households: The average occupancy of temporary accommodation at the end of each quarter from 2021/22 to 2024/25 is 130 households. See Table H4. For example, the average cost to the Council to accommodate one homeless household in emergency housing is approximately £20,000 per annum

Increasing affordability issues: ratio of the median house price to the median wage in the area evidences a year-on-year rise over the past four years, with Spelthorne outpacing the ratios for both the South East and England. Lack of new-build affordable housing: The net increase of provision over the past five years has been a mere 321 units – with only 43 units provided in the past two years. In planning terms, affordable housing can only be secured with schemes of 15 houses or more (policy HO3) and many applications are for a lower number of dwellings than this. In addition, each application (for 15+ units) which is not policy compliant with policy HO3, is required to provide a viability assessment on an open book approach which is undertaken by an independent advisor appointed by the LPA. Due to the rising costs in recent times, several of the applications have been able to demonstrate that providing affordable housing is non viable. The Council is currently exploring other ways (other than s106 agreements) to secure the much needed affordable housing.

The effect of our proximity to London

As well as the evident demand for affordable housing from local residents, there is also considerable pressure from London. The cost of housing in London is even higher than in Spelthorne, and London boroughs are actively placing homeless households from their boroughs into Spelthorne, as well as 'block booking' emergency accommodation facilities within Spelthorne for their

homeless people, placing further demand on the already strained private sector.

Key worker accommodation

Whilst housing affordability is a significant issue in general, it acutely affects key workers, who help to run the essential local services such as schools, hospitals, doctor's surgeries and fire stations. According to Government statistics released in 2011, the latest records available, the medium income for employees within Spelthorne is £31,457, which is in line with the Surrey average. However, the starting salaries for essential local workers is much less. We know anecdotally that key worker staff are moving further and further away from Spelthorne into Hampshire and Berkshire and commuting to work. This means that when they look for their next promotion they are more likely to look in those areas; this is another factor leading to loss of workforce. Whilst some key workers are being recruited from London, one of the main factors which will keep them in Spelthorne is availability of affordable housing.

Appendix 4

Table 19 Housing completions (net) by sector April 2009-March 2024

	Total Dwellings (Gross)				Losses (ii)				Net Completions				
Year (Apr-Mar)	Private	RSL	Public	Total	Private	RSL	Public	Total	Private	RSL	Public	Total	Running Total
2009-2010	197	99	0	296	29	56	0	85	168	43	0	211	211
2010-2011	116	96	0	212	29	44	0	73	87	52	0	139	350
2011-2012	118	144	0	262	43	60	0	103	75	84	0	159	509
2012-2013	159	63	0	222	32	20	0	52	127	43	0	170	679
2013-2014	154	44	0	198	7	0	0	7	147	44	0	191	870
2014-2015	317	16	0	333	25	43	0	68	292	-27	0	265	1,135
2015-2016	217	138	0	355	33	14	0	47	184	124	0	308	1,443
2016-2017	328	46	0	374	27	0	0	27	301	46	0	347	1,790
2017-2018	278	9	0	287	37	0	0	37	241	9	0	250	2,040
2018-2019	304	6	0	310	21	0	0	21	283	6	0	289	2,329
2019-2020	248	0	0	248	20	0	0	20	228	0	0	228	2,554
2020-2021	479	177	0	656	17	0	0	17	462	177	0	639	3,196
2021-2022	106	104	0	210	5	0	0	5	205	0	0	205	3,401
2022-2023	150	0	0	150	12	0	0	12	12	0	0	138	3,539
2023-2024	263	43	0	306	19	0	0	19	244	43	0	287	3,826
2009-2022(i)	3,434	948	0	4,419	356	237	0	593	3,182	644	0	3,826	27,875
		5											

(i) Period covered by the Spelthorne Core Strategy and Policies DPD.

(ii) Losses of residential units (through redevelopment, conversion and to other uses) are accounted for in the year in which a development is commenced on the site

