

# **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)

**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>
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**

<b>Representor</b>	<b>Summary of Representation</b>	<b>Council's Response</b>	<b>Amend SPD?</b>
	<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>	

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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>		
<p>Private Individual</p>	<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**

<b>Represontor</b>	<b>Summary of Representation</b>	<b>Council's Response</b>	<b>Amend SPD?</b>
	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>

**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>
	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.

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<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>

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<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>

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<b>Representor</b>	<b>Summary of Representation</b>	<b>Council's Response</b>	<b>Amend SPD?</b>
	<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>

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<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>

**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>
	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.

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<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.