

**AFFORDABLE HOUSING  
SUPPLEMENTARY PLANNING DOCUMENT (SPD)**

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

**REGULATION 12 STATEMENT OF CONSULTATION**

**Includes the results of Public Consultation and the  
subsequent Summary of Changes made to the SPD.**

**April 2022**



# Consultation Statement for the Affordable Housing Supplementary Planning Document (SPD)

## Table of Contents

|  |    |
|--|----|
| Introduction.....  | 5  |
| Background .....   | 5  |
| SPD preparation and early stakeholder involvement in the draft SPD ..... | 6  |
| Main Issues Raised and how these issues were addressed.....              | 7  |
| SPD Formal Public Consultation .....                                     | 11 |
| Other changes made to the SPD prior to its adoption.....                 | 24 |



## Introduction

1. This Consultation Statement outlines the ways in which stakeholders have been engaged during the preparation of the Affordable Housing Supplementary Planning Document (SPD).
2. In line with Regulation 12 of the Town and Country Planning (Local Planning) (England) 2012 regulations and with the Runnymede Statement of Community Involvement (5<sup>th</sup> March 2021), this statement provides details of:
  - (i) the persons the local planning authority consulted when preparing the SPD;
  - (ii) a summary of the main issues raised by those persons; and
  - (iii) how those issues have been addressed in the SPD.
3. Runnymede Borough Council formally consulted on a draft version of the Affordable Housing SPD over eight weeks from 1<sup>st</sup> December to 25<sup>th</sup> January 2022. This consultation was considerably longer than the statutory four-week requirement, to allow for the fact that the consultation took place over the Christmas period.
4. This consultation statement has been updated to reflect the feedback received and how this has been taken into account in the final version of the SPD (see Table 2 below). In addition, other changes have also been made to the SPD, mainly of a minor and editorial nature, and these are set out in more detail in Table 3 of this Statement together with the reasons for these changes. This final consultation statement will be published alongside the SPD for adoption.

## Background

5. The cost of housing accommodation in Runnymede Borough is high. Median house prices in the Borough are nearly 10 times median gross annual workplace-based earnings<sup>1</sup>. The average price for a property in Runnymede in May 2021 stood at £434,562, according to HM Land Registry data.
6. To address this issue, the Runnymede 2030 Local Plan includes Policy SL20: Affordable Housing, which requires that affordable housing be provided on all sites that result in a net gain of 10 or more (net) dwellings. This SPD sets out in more detail how the affordable housing policy will be implemented through the planning process.

---

<sup>1</sup> Median workplace-based affordability ratios (Table 5c) 1997-2020 Officer for National Statistics

7. The SPD does not include new policies and does not form part of the Council's Development Plan. However, once adopted, the SPD will form a material consideration in the determination of planning applications.

## SPD preparation and early stakeholder involvement in the draft SPD

8. The draft Affordable Housing SPD was prepared following a review of the previous Runnymede Affordable Housing Supplementary Planning Guidance (December 2007).
9. Officers initially scoped the content of the earlier SPD document. The sections to be included in the SPD were identified and then the best source of obtaining information on these various topic areas determined.
10. Officers also considered what additional issues have arisen that needed to be addressed within the updated SPD. Recent examples of Affordable Housing SPDs produced by other local authorities were also looked at to see if they covered any issues that would be beneficial to consider for Runnymede Borough.
11. In addition to the above, a number of presentations were given and meetings held to discuss the contents of the Affordable Housing SPD. In addition, stakeholders likely to have a particular interest in affordable housing delivery in the Borough were contacted directly about the SPD. Comments made on its contents are set out in Table 1 below together with the Council's response to the comments raised.
12. More specifically, the following early engagement on the draft Affordable Housing SPD was held:
  - A presentation was given on the proposed contents of the Affordable Housing SPD to the Housing and Enabling Working Party on 12<sup>th</sup> October 2021.
  - On the 14<sup>th</sup> October 2021, a member of the Planning Policy team attended the Runnymede Housing Development Partnership, in order to discuss the SPD with registered providers in the Borough.
  - A summary of the contents of the Affordable Housing SPD was sent out to 102 developers, agents, landowners and registered providers on the 14<sup>th</sup> October 2021, for a two-week consultation period.
  - A presentation was given on the proposed contents of the Affordable Housing SPD to the Infrastructure and Economic Development Working Party on 20<sup>th</sup> October 2021.

The comments made by attendees at these meetings are picked up in Table 1. Main Issues Raised and how these issues were addressed

13. Overall, the proposed content of the draft SPD was well-received, and the feedback was positive and constructive. More detailed points raised and the responses to them are set out below in Table 1.

**Table 1: RBC response to main comments raised during period of early engagement on the Affordable Housing SPD**

| Contents of the informal draft SPD             | Issues raised  | Response   |
|--|--|--|
| Affordable Housing Tenure                      | No mention is made of First Homes. Will this be addressed in the SPD                         | The initial intention was to include references to this new tenure in the SPD. However, this position has now changed (for the reasons set out below in Table 2) and the detail relating to the implementation of First Homes has been set out in an Interim Policy Statement on First Homes, which is available to view on the Council's website. |
| Commuted sums                                  | The best way to calculate commuted sums in lieu of on-site affordable housing was discussed. | It was considered that a Commuted Sums calculator should be produced which sits alongside the AH SPD. This would allow applicants to calculate the commuted sum payment expected for their proposed development.   |
| Preferred Registered Providers                 | Should this be in the SPD?   | It was considered that it was helpful to provide this information but whilst the Council could encourage developers to work with these providers, it wasn't enforceable.   |
| Nomination agreements and Local Lettings Plans | Would the SPD include templates of Nominations Agreements and Local Lettings Plans?          | Whilst none of these templates are currently proposed to be included in the SPD, signposting to the Council's Housing team will be provided if an applicant needs further advice on these templates/ requirements.   |
| Design of affordable housing                   | Does the SPD take into account parking for the affordable housing schemes?                   | The SPD sets out that parking for affordable housing schemes should meet the Council's current parking standards. The Council expects the same parking   |

|           |  |  |
|-----------|--|--|
|           |  | provision to be made available for affordable and market housing of the same size.   |
|           | Does the SPD include information about making developments more sustainable and net zero in particular?              | The SPD includes a cross reference to the adopted Design SPD (June 2021) and also policy EE1: Townscape and Landscape Quality of the Local Plan, which sets out the criteria for achieving good urban design within the context of national advice.<br>As far as net zero is concerned, that goes beyond the scope of the SPD in that its purpose is to provide guidance on existing policies in the adopted Local Plan and it cannot create new policy. This issue will therefore need to be picked up in the new Local Plan. |
|           | Is there any cross referencing to the Thorpe Neighbourhood Plan Design Principles?                                   | The draft SPD didn't originally include this cross-reference to the Thorpe Neighbourhood Plan and other emerging Neighbourhood Plans. The text of the draft SPD was therefore amended to reflect this point.   |
| Viability | Can more be done to address this issue and ensure that affordable housing provision is maximised?                    | The draft SPD already included a section on Viability. However, in response to this issue this section was reviewed, and a number of changes made in order to try and ensure that the Council maximises its provision of affordable housing in the Borough.  |
|           | Has the Harrogate model, which is used to set transfer values for affordable housing land, been included in the SPD? | The Harrogate model is used as a means of setting transfer values for land for affordable housing. In order to be included in the SPD it would need to have been taken into account as part of the Viability   |

|               |   |   |
|---------------|---|---|
|               |   | Appraisal which underpinned the adopted Runnymede 2030 Local Plan. This wasn't the case and consequently as the SPD cannot set new policy this model cannot be included in the SPD but could be considered as part of the new Local Plan.   |
| Planning Bill | Are the changes set out in the Planning White Paper and the proposed planning bill taken into consideration in the SPD? | No. It is unclear at this stage what those changes will be particularly with the recent change in Housing Ministers. However, the SPD will need to consider these changes prior to adoption and if they impact on issues such as the future of Section 106s or other factors that would impact on the contents of the SPD, further amendments to the SPD may be needed to reflect this. |

## SPD Formal Public Consultation responses

14. As set out above, formal public consultation took place on the draft Affordable Housing SPD between 1<sup>st</sup> December 2021 and 25th January 2022. Nine responses were received to the SPD.
15. People were made aware of the consultation through:
  - Notifying statutory consultees and generic and specific stakeholders on our consultation database.
  - Placing hard copies of the SPD in local libraries and the Council's Reception Area.
  - All of the consultation material was made available on the Council's website.
16. Table 2 below summarises the comments received to the public consultation and the Council's responses to them. It also outlines any changes made to the SPD as a result of these comments.

**Table 2: Representations received to the Affordable Housing SPD and the Council’s response to them**

| Representor                          | Summary of Representation  | Council’s Response  | Amend SPD?  |
|--------------------------------------|--|---|---|
| <p><b>Accent Housing Limited</b></p> | <p>First Homes – It appears allocated sites within the current plan will not be subject to First Homes. There’s not much information on what happens where there is a requirement for windfall sites.</p> <p>Issues for RP’s in delivering shared ownership with small numbers etc.</p> <p>First Homes are at a 30% discount but would Runnymede demand greater discounts if needed?</p> | <p>As First Homes are being introduced quickly by the Government and, as a result, the Council does not currently have evidence to include the full extent of local eligibility criteria in the Borough, it is considered that the position on First Homes in Runnymede should be set out in an Interim Policy Statement, as opposed to within this SPD. This will enable future updates to be made as and when more supporting evidence becomes available.</p> <p>The precise wording change is set out below in Table 3 for paras. 1.3.1 and 2.3.10.</p>  | <p>Yes. Amend the SPD to remove references to the implementation of First Homes and instead refer the reader to the Council’s published Interim Policy Statement.</p> |
|                                      | <p>Social / Affordable Rent. Is there a preferred rented tenure? Social or Affordable?. Given the high rental values in the district, surprised no cap e.g. 70% of Market Rent’s for Affordable Rent rather than the national 80%. Consider graded caps e.g. 80% for 1 beds down to 50% for 4 beds?</p>  | <p>The purpose of the SPD is to interpret and provide guidance on existing policy. Policy SL20 of the adopted Local Plan doesn’t differentiate between social and affordable rent, as there is not sufficient evidence to do so. The SPD cannot therefore make this distinction. It is however hoped that more detailed evidence will be produced on this issue in the Housing and Economic Development Needs Assessment (HEDNA) as part of the evidence for the review of the Local Plan. It is intended that a more detailed approach to this issue will be included in the next iteration of the Local Plan.</p> | <p>No change.</p>   |

| Representor | Summary of Representation  | Council's Response  | Amend SPD?   |
|-------------|--|---|--|
|             | <p>Site maximisation. I can see pushback from developers as while RBC are wanting to maximise site density to meet affordable needs, they are citing nationally described space standards minimums for AH dwellings. Land availability / cost will be critical here so may see challenges around unit sizes.</p> | <p>This text is based on Policy SL19 of the adopted Local Plan so whilst there might be push back, if an applicant wants to secure planning permission they will need to take the requirements of policy SL19 into account.</p> <p>In term of land costs, it has been assumed that Accent Housing Ltd are referring to the Harrogate Model which, as referred to above on page 9, wasn't included in the Viability work that underpinned the Local Plan and consequently cannot be included in the SPD.</p> | <p>No change.</p>  |
|             | <p>Good to see same parking standards for AH as private.</p>   | <p>Noted.</p>   | <p>No change.</p>  |
|             | <p>Positive to see AH distributed throughout a site, to promote an inclusive, sustainable community.</p>   | <p>Noted.</p>   | <p>No change.</p>  |
|             | <p>It would be good to see reference in the SPD to local lettings plans being encouraged for the affordable homes, even it doesn't include a template .</p>  | <p>The SPD is a planning document and is not therefore considered to be the right place for this level of detail on what is effectively a housing issue. Instead, a reference has been included in the SPD as to where to get additional housing templates.</p>   | <p>Minor change.</p>   |
|             | <p>On the viability, although an open book viability assessment is expected, it goes on to open the</p>  | <p>It will be for the Council to decide if the information contained in the report is commercially sensitive and therefore requires</p>   | <p>Add additional text to para. 3.1.14 to clarify the limited circumstances in</p> |

| Representor | Summary of Representation  | Council's Response   | Amend SPD?   |
|-------------|--|--|--|
|             | <p>door for the developer to redact some parts. I can see developers taking this opportunity!</p>  | <p>redaction. It is suggested that additional wording (red text) is added to the SPD at para. 3.1.14</p> <p>Where a developer raises viability concerns in relation to contributions for an application, the Council will, as set out in the adopted Runnymede 2030 Local Plan, expect a full "open-book" viability assessment for the scheme, unless <b><u>in exceptional circumstances</u></b> the applicant can clearly demonstrate why parts <b><u>of the assessment are so commercially sensitive that it</u></b> must be redacted.</p> | <p>which developers may be able to withhold information from an open book appraisal.</p> |
|             | <p>Interesting to see in the Regulation 12 statement that RBC can't include the 'Harrogate model' in the SPD, but it doesn't say whether this is being considered as a new policy separate to the SPD.</p> | <p>As set out above, in response to the comment on social/ affordable rent, the Council needs evidence to include a policy in a Local Plan. The Harrogate Model wasn't included in any of the evidence used to produce the Local Plan, and in particular, in the viability work underpinning the Plan. It cannot therefore be referred to within this SPD. The Harrogate Model would need to be included in the review of the Local Plan and its evidence before it can be included as a new policy separate to the SPD.</p>                 | <p>No change.</p>  |

| Representor                        | Summary of Representation  | Council's Response  | Amend SPD?        |
|------------------------------------|--|---|-------------------|
| <b>Egham Residents Association</b> | <p>The Egham Residents' Association (ERA) empathise with the spirit and essence of this document.</p>  | <p>The support from Egham Residents' Association in terms of the spirit and essence of this document is appreciated.</p>  | <p>No change.</p> |
|                                    | <p>The problem is of such a scale that action to solve it both quickly and fully seems utterly impossible without radical changes in attitude and policy. The implications are so serious, however, that a big drive to tackle and diminish the problem is a necessity. This document and the Runnymede 2030 Local Plan Policy SL20 (on 'affordable' housing), which it furthers, are steps in the right direction. But do they go far enough?</p> | <p>The scale of the problem is recognised by the Council. However, it is considered that within the existing policy regime in which the Council operates, we can only expect s106s from developers to provide a contribution towards increasing affordable housing (either by way of physical provision or through financial contributions in some exceptional circumstances), and through other initiatives being delivered by the Council's Housing Department. Other, more radical proposals to address affordability issues would need to be driven through policy changes at the national level.</p> | <p>No change.</p> |
|                                    | <p>Are the affordable housing percentages included in Policy SL20 high enough in the prevailing circumstances, how can they be?</p>  | <p>As set out above, s106s is one means of assisting with the problem, but they are certainly not going to address the problem in its entirety. We need to be realistic in setting these percentages and base them on a level that is considered viable for the Borough. The %s contained in the adopted Local Plan were</p>  | <p>No change.</p> |

| Representor | Summary of Representation  | Council's Response   | Amend SPD? |
|-------------|--|--|------------|
|             |  | informed by the viability evidence that underpinned the Local Plan and were balanced against the need for other policy requirements such as contributions to infrastructure provision in the Borough needing to be sought from new development.  |            |
|             | Something that is missing from this SPD is evidence of how well or otherwise RBC has been doing so far in trying to meet the objectives set out in Local Plan Policy SL20. How much of the net additional housing in the borough since 2015 has been 'affordable'? | This information is in the Council's Annual Monitoring Report ( <a href="#">AMR</a> ).   | No change  |
|             | It is incumbent upon RBC itself to set a good example, we are also wondering how the non-student elements of the Gateway West (Magna Square) complex match up to what is laid down in SL20.  | The documentation submitted with RU.19/0437 Land at High Street/ Station Road (North)/ Church Road Egham sets out that the non-student element of this application is for 108 dwellings of which 41 are affordable i.e. 38%. This is therefore above the requirement set out in Policy SL20 of the Local Plan. | No change  |
|             | It is a pity, moreover, that there is no acknowledgement in this SPD that housing provision in Egham (and beyond) has been seriously skewed by the expansion in Royal Holloway College student numbers.  | Noted.   | No change. |

| Representor                | Summary of Representation  | Council's Response  | Amend SPD?  |
|----------------------------|--|---|---|
|                            | ERA applauds the commitments in the SPD on design and space standards for 'affordable' housing, and we also welcome what is said about stopping developers from trying to wriggle out of obligations to provide a bigger element of such accommodation.  | Noted.  | No change.  |
| <b>Environment Agency</b>  | Thank you for consulting the Environment Agency on your Affordable Housing SPD, we have no comments to make.   | Noted.  | No change.  |
| <b>Natural England</b>     | Thank you for your consultation regarding the Runnymede Affordable Housing Supplementary Planning Document (SPD).<br><br>Natural England has <u>no comments</u> to make.   | Noted.  | No change.  |
| <b>Raven Housing Trust</b> | The criteria relating to Registered Providers appear to be heavily weighted towards providers which already operate in the Borough.<br><br>For example, in para.2.1.5, it states that "The Council works with a number of affordable housing providers that meet the following criteria"...the first bullet point refers to those that "Own and manage stock in the Borough;"<br><br>This is also true of para. 2.17 the first two bullet points of which state that, "Whether the | The Council has set out that it has a list of preferred partners who have a successful track record of delivering affordable housing in the Borough, as is clearly set out in paras. 2.1.5 and 2.1.7 of the SPD.<br><br>However, despite this we recognise that other providers that aren't currently represented in the Borough may wish to operate in Runnymede. The Council wishes to ensure that providers who don't currently operate in the | The suggestions made for changes to the criteria relating to Registered Providers (para. 2.1.7) have been taken into consideration and a number of amendments made to the text (see previous column for details). |

| Representor | Summary of Representation  | Council's Response  | Amend SPD? |
|-------------|--|---|------------|
|             | <p>organisation has any other affordable housing in the Borough or in neighbouring local authority areas;" and "Past commitment and performance in the Borough;"</p> <p>My instinct is Raven could provide excellent, locally focused and accountable services but could be discouraged from working in the borough. A suggestion might be to have providers who:</p>  | <p>area meet certain minimum criteria before being encouraged to operate in the area.</p>   |            |
|             | <p>Understand their customers and who tailor services to all customers being accessible (this is particularly important post pandemic)</p> <p>Which engages positively with the local authority, supporting the wider housing strategy (as above).</p> <p>Maybe something around maintaining at least G2 V2 as a regulatory assessment (so you're not supporting HA's who are judged as being non-compliant with the regulatory framework).</p> <p>Demonstrable commitment to Equality and Diversity in the local setting.</p> <p>Promote innovation and best practice locally and nationally.</p> | <p>It is considered that this criterion would be difficult to measure and as such has not been included in the SPD.</p> <p>Agreed. This criterion has now been included in para. 1.7</p> <p>It is considered that this criterion would not necessarily be directly relevant to proposed future provision and so has not been added to the SPD.</p> <p>Agreed. This criterion has now been included in para. 1.7</p> <p>It is considered that this criterion would be difficult to measure and as such has not been included in the SPD.</p> |            |

| Representor                          | Summary of Representation  | Council's Response  | Amend SPD?  |
|--------------------------------------|--|---|---|
|                                      | <p>Commitment to Net Zero and sustainability</p> <p>Commitment to affordability and tenancy sustainment</p>  | <p>Agreed. This criterion has now been included in para. 1.7</p> <p>Agreed - evidence of measures to increase the likelihood of tenants successfully managing their tenancies. This criterion has now been included in para. 1.7.</p>   |   |
| <p><b>Southern Housing Group</b></p> | <p>We are very supportive of the objective and implementation process as outlined in the document.</p> <p>The clarity around parking levels for affordable tenure and the viability appraisal process are particularly welcome.</p>  | <p>Noted</p>  | <p>No change.</p>   |
|                                      | <p>Para. 3.1.3 The reference to affordable housing being given priority over less critical infrastructure is also welcome.</p>   | <p>Noted</p>  | <p>No change.</p>   |
|                                      | <p>Para. 4.1.13: Ask that this section is titled recycling of subsidy, rather than receipts. The RP business model will not be able to implement a system requiring recycling of receipts from S/O in specific boroughs. A system as implemented by Homes England in relation to Recycled Grant would be acceptable. The equivalent of grant</p> | <p>Agreed that the heading to this section is misleading. However, it is considered that the heading "Replacing affordable housing that is lost" would be more appropriate for this section. In addition, for clarity the word 'receipts' has been changed to 'monies' in the second sentence so that it now reads as "In all</p> | <p>The heading to this section has been changed and a word changed.</p> |

| <b>Representor</b>                       | <b>Summary of Representation</b>  | <b>Council's Response</b>   | <b>Amend SPD?</b> |
|--|---|---|-------------------|
|  | would be a calculation of the value that has been captured from the planning gain, and this element could be subject to recycling. But the methodology could be complicated and difficult to enforce.   | cases the Council expects the dwelling(s) to be replaced within the Borough, or any <u>monies</u> arising from the disposal of the dwelling(s) to be recycled to provide further affordable housing in the Borough, whenever possible.” |                   |
| <b>Surrey County Council</b>             | Thank you for consulting us on the Affordable Housing SPD. We do not have any comments to make.   | Noted.  | No change.        |
| <b>Transport for London</b>              | Thank you for consulting Transport for London (TfL). I can confirm that we have no comments to make on the draft Affordable Housing SPD.  | Noted.  | No change.        |
| <b>Waverley Borough Council</b>          | Thank you for consulting Waverley Borough Council on the draft Affordable Housing Supplementary Planning Document. We have no comments to make.   | Noted.  | No change.        |
| <b>Runnymede Housing Team's comments</b> | Thank you for the opportunity to comment on the draft Affordable Housing Supplementary Planning Document (SPD). We are very keen to have the SPD in place to strengthen the Council's commitment to securing affordable housing (AH) and to clarify its requirements. We agree that AH is central to local people having good life chances and that it also helps to build strong communities and boost the economy. Our Housing Strategy | Noted.  | No change.        |

| Representor | Summary of Representation   | Council's Response   | Amend SPD?                               |
|-------------|---|--|--|
|             | Statement (2021 – 2026) includes the aspiration for sufficient and affordable, good quality housing that is accessible and suitable for local people in Runnymede. We have a strategic aim to increase the provision of AH including low cost home ownership; and believe this SPD will help us achieve this.   |  |  |
|             | We welcome the SPD as a tool to ensure the robust enforcement of Local Plan policies, but as stated, it is also helpful to encourage applicants to seek confirmation from us of the Council's most current requirements for the mix, size and tenure of rented properties for AH because – again, as stated – the needs of those on the Housing Register do fluctuate. To further inform this, we look forward to the results of the HEDNA analysis of housing needs, particularly with regard to affordability and mobility and in respect of those not currently registered with us for social housing. This work will help with our strategic aim to identify local housing need to plan effectively for the future. | Noted.   | No change.                               |
|             | We are particularly supportive of encouraging pre-application dialogue, particularly in relation to the issues identified at 2.1.3. We remain committed to strongly encouraging the selection   | Noted and further wording has been added to the SPD at para. 2.1.8 to reflect this position (see below). | See the adjoining column for the wording |

| Representor | Summary of Representation  | Council's Response   | Amend SPD?                      |
|-------------|--|--|---------------------------------|
|             | <p>of RPs from our list of Preferred Partners and believe this can be strengthened by using standardised definitions and text in draft s.106s to be shared with developers early on in the process, to aid clarity and avoid protracted negotiations. We are aware that other RPs may wish to acquire AH and - in order to always ensure we have RPs with a commitment to promoting sustainable communities in the Borough and to working in partnership with us on our Tenancy Strategy objectives - we will be happy to work with you to refine the criteria proposed in the draft SPD and the steps to be followed if the owner is unable or unwilling to enter into a contract for the disposal of the AH Units to one of our existing Preferred Partners. We also look forward to working with you to finalise the wording to be included in the template(s), based on current best practice in the sector.</p> | <p><b><u>“The Council has established good relationships with a number of Partner Registered Providers (known as ‘Partner RPs’) that operate effectively in partnership with the Council to provide affordable housing that meets local housing need. As such, the Council encourages developers to meet their affordable housing obligations by forming a partnership with one of the Council’s Partner Registered Providers following discussion with Housing Services. Applicants should contact the Council for an up-to-date list of Partner Registered Providers and advice on which Registered Provider would be most appropriate for their development.”</u></b></p> | <p>changes made to the SPD.</p> |
|             | <p>Providing housing that is genuinely affordable is a significant challenge. The Affordable Rent product, with a rent of 80% of market rent is not affordable in practice for many households on the housing register and those the Council has a statutory duty to house. Homes England are keen</p>   | <p>Noted</p>   | <p>No change</p>                |

| Representor | Summary of Representation   | Council's Response   | Amend SPD? |
|-------------|---|--|------------|
|             | to see more properties delivered in high cost areas such as Runnymede at Social ("formula") Rent, as charged by RBC for Council properties and is providing grant to achieve this, although s.106 sites would not usually qualify unless the scheme becomes 100% affordable. It is hoped that the HEDNA will evidence this need, resulting in a requirement for Social Rent in the SPD. |  |            |
|             | We welcome the approach to commuted sums and can confirm that – with a commitment to deliver 125 new Council homes over the next 5 years - these funds could be spent on Council new build developments.  | Comments noted.  | No change. |
|             | Finally, we also welcome the proposal to use overage/clawback clauses when considering viability and look forward to the detail of how these will be enforced.  | No further detail on this will be provided in the SPD. This will require further discussions between the Council's Housing and Legal Services teams. | No change. |

## Other changes made to the SPD prior to its adoption

17. In addition to the changes set out above, made to take account of consultation responses to the SPD, a number of other changes were also made to the Draft Affordable Housing SPD. These changes and the reasons for them, are set out in more detail in Table 3 below either struck through where text has been deleted or in bold and underlined where text has been added.

| Paragraph                           | Original Text   | Text as Modified on Adoption  | Reason  |
|-------------------------------------|---|---|---|
| Text on the back of the front cover | <p>Published by Runnymede Borough Council<br/>October 2021<br/>Runnymede Civic Centre<br/>Station Road<br/>Addlestone<br/>Surrey<br/>KT15 2AH</p> <p>This document can be viewed and downloaded from:<br/><a href="https://www.runnymede.gov.uk/say/consultations-surveys">https://www.runnymede.gov.uk/say/consultations-surveys</a></p> | <p>Published by Runnymede Borough Council<br/><del>October 2021</del> <b>March 2022</b><br/>Runnymede Civic Centre<br/>Station Road<br/>Addlestone<br/>Surrey<br/>KT15 2AH</p> <p>This document can be viewed and downloaded from:<br/><a href="https://www.runnymede.gov.uk/say/consultations-surveys">https://www.runnymede.gov.uk/say/consultations-surveys</a><br/><br/><a href="https://www.runnymede.gov.uk/planning-policy/preparation-supplementary-planning-documents/6">https://www.runnymede.gov.uk/planning-policy/preparation-supplementary-planning-documents/6</a></p> | To identify the adopted version of the SPD and delete details of public consultation. |
| On all pages of the SPD             | Delete the Draft watermark.   | Leave each page clear of a watermark.   | To identify the adopted version of the SPD and delete details of public consultation. |
| Throughout document                 | Correction of minor typographical errors/minor wording issues   | Not specifically set out in this table but corrected as necessary   | To ensure that the document reads well  |
| Para. 1.1.1 First sentence          | This supplementary planning document (SPD), focuses on affordable housing in Runnymede and helps to implement the council's Local Plan Policies for affordable housing particularly Policy SL20: Affordable Housing and Policy SL19: Housing Mix and Size Requirements....  | This supplementary planning document (SPD), <b>which was adopted on 13<sup>th</sup> April 2022 (and implemented on 20<sup>th</sup> April 2022)</b> focuses on affordable housing in Runnymede and helps to implement the council's Local Plan Policies for affordable housing particularly Policy SL20: Affordable Housing and Policy SL19: Housing Mix and Size Requirements....   | To identify the adopted version of the SPD and delete details of public consultation. |
| Section 1.2 Background              | Not applicable. Officers were asked at Planning Committee on 24 <sup>th</sup> November 2021 to consider   | There is limited ability to consider 'local market value' in Runnymede given the Government's definition of   | No change proposed  |

| Paragraph   | Original Text  | Text as Modified on Adoption   | Reason   |
|-------------|--|--|--|
|             | <p>Local Market Value in more detail with the Council’s Housing Team and report back thereon.</p>                                    | <p>affordable housing, outside of social rent (as charged by the Council for most of the existing housing stock) and the new First Homes initiative.</p> <p>The current Local Plan Affordable Housing Policy (SL20) doesn’t distinguish between social and affordable rent.</p> <p>Affordable rent is defined as up to 80% of market rent and so it can still be at a level beyond the reach of households in housing need. Social rent is set based on a formula set by the Government which is calculated based on the relative value of the property, relative income levels, and the size of the property. Social rents tend to be lower than affordable rent.</p> <p>Registered Providers tend to deliver affordable rent as opposed to social rent.</p> <p>The Council has ensured that the HEDNA work will include a fine-grained assessment to look at what the need is for affordable/ social rent and other forms of AH in more detail. This will enable a more detailed affordable housing policy to be included in the next iteration of the Runnymede Local Plan.</p> <p>The Housing Team have provided a note on the Rent Setting Policy, approved 9<sup>th</sup> June 2021, which can be forwarded to Members if they wish to see it.</p> |  |
| Para. 1.2.7 | <p>Once adopted, this Supplementary Planning Document (SPD) will replace the existing Runnymede Affordable Housing Supplementary</p> | <p><del>Once adopted,</del> <u>This</u> Supplementary Planning Document (SPD) <del>will</del> <u>replaces</u> the existing Runnymede</p>   | <p>To identify the adopted version of the SPD and delete details of public consultation.</p> |

| Paragraph                                 | Original Text   | Text as Modified on Adoption   | Reason   |
|---|---|--|--|
|   | Planning Guidance (adopted on 13 <sup>th</sup> December 2007).  | Affordable Housing Supplementary Planning Guidance (adopted on 13 <sup>th</sup> December 2007).  |  |
| Para. 1.3.1<br>Other relevant definitions | <p>However, the Guidance sets out a few instances where the new First Homes policy requirements do not apply, one of which is, as set out in the Planning Practice Guidance on First Homes (para. 18) where Local Plans have been “submitted for examination before 28<sup>th</sup> June 2021 or have reached publication stage by 28<sup>th</sup> June 2021 and subsequently submitted for examination by 28 December 2021, will not be required to reflect the First Homes Policy requirement.” The Runnymede 2030 Local Plan was adopted in July 2020 and is therefore considered to fall under these transitional arrangements. Consequently, in line with this guidance (para. 019) “As set out in the Written Ministerial Statement, where local and neighbourhood plans are adopted under the aforementioned transitional arrangements, the First Homes requirements will also not need to be applied when considering planning applications in the plan area on allocated sites, until such time as the requirements are introduced through a subsequent update.”</p> <p>The First Homes policy requirement is not therefore considered to need to be reflected in the Local Plan, until such time as the Runnymede 2030 Local Plan has been reviewed and updated (see para. 2.3.10 below for more on First Homes).</p> | <p><b><u>An Interim Policy Statement (IPS) has been produced for First Homes. This sets out how this new form of affordable housing will be applied in Runnymede. As First Homes are being introduced quickly by the Government and, as a result, we don’t currently have evidence to include the full extent of local eligibility criteria in the Borough, it is considered that the position on First Homes in Runnymede should be set out in an Interim Policy Statement, as opposed to within this SPD. This will enable future updates to be made as and when more supporting evidence becomes available.</u></b></p> <p><del>However, the Guidance sets out a few instances where the new First Homes policy requirements do not apply, one of which is, as set out in the Planning Practice Guidance on First Homes (para. 18) where Local Plans have been “submitted for examination before 28<sup>th</sup> June 2021 or have reached publication stage by 28<sup>th</sup> June 2021 and subsequently submitted for examination by 28 December 2021, will not be required to reflect the First Homes Policy requirement.” The Runnymede 2030 Local Plan was adopted in July 2020 and is therefore considered to fall under these transitional arrangements. Consequently, in line with this guidance (para. 019) “As set out in the Written Ministerial Statement, where local and neighbourhood plans are adopted under the aforementioned transitional arrangements, the First Homes requirements will also not need to be applied when considering planning applications in the plan area on allocated sites, until</del></p> | <p>This change has been made to address the clarification point, requested at Planning Committee on 24<sup>th</sup> November 2021, on First Homes.</p> <p>Since the draft Affordable Housing SPD was produced an Interim Policy Statement has been produced on First Homes. This sets out the Council’s position with regards to the implementation of First Homes, as it is more easily updated as evidence on this new tenure emerges.</p> |

| Paragraph    | Original Text  | Text as Modified on Adoption  | Reason  |
|--------------|--|---|---|
|              |  | <p><del>such time as the requirements are introduced through a subsequent update.”</del></p> <p><del>The First Homes policy requirement is not therefore considered to need to be reflected in the Local Plan, until such time as the Runnymede 2030 Local Plan has been reviewed and updated (see para. 2.3.10 below for more on First Homes).</del></p>   |   |
| Para. 2.1.4  |  | <p>Additional text added at the end of the existing para.</p> <p><b><u>Please check with Legal Services to see the latest version of the s106 agreement.</u></b></p>  | To future proof the s106 template.  |
| Para. 2.3.8  | <p>In terms of <b>tenure</b>, the overall housing target on qualifying sites is to provide 70% of the total dwellings as social/affordable rented properties and 30% as other forms of affordable housing. Social rented homes are preferred in order to facilitate movement which makes best use of the social housing stock in the Borough.</p>  | <p>In terms of <b>tenure</b>, the overall housing target on <del>qualifying sites</del>, <b><u>as set out in Policy SL20 of the adopted Local Plan</u></b>, is to provide 70% of the total dwellings as social/affordable rented properties and 30% as other forms of affordable housing. <b>Social rent is the preferred form of tenure of affordable housing needed in the Borough.</b></p>   | On reading this through it was considered that it would be useful to provide detail as to what was meant by a qualifying site and to simplify the meaning of the text.                                    |
| Para. 2.3.10 | <p>Whilst the Council has noted above that the First Homes policy requirement will not need to be applied when considering planning applications in the plan area on allocated sites, until such time as the requirements are introduced through a subsequent update (i.e. until such time as the Runnymede 2030 Local Plan has been reviewed and updated), should either Planning Policy Guidance or a Ministerial Statement be issued that makes it clear that the First Homes policy requirement does apply prior to any subsequent Local Plan update, in calculating the number of units to be provided on any qualifying site, local decision makers will determine the relative weight to give local and</p> | <p><b><u>The details of the implementation of First Homes in Runnymede are set out separately in an Interim Policy Statement (IPS). However, it is important to note that the introduction of First Homes results in the tenure mix of affordable housing dwellings in Runnymede changing from the 70:30 split, outlined in para. 2.3.8 above, to 25% First Homes, 53% social/ affordable rent and 30% other forms of affordable housing, as is clearly set out in the IPS.</u></b></p> <p><del>Whilst the Council has noted above that the First Homes policy requirement will not need to be applied when considering planning applications in the plan area on allocated sites, until such time as the requirements are introduced through a subsequent update (i.e. until such time as the Runnymede 2030</del></p> | Since the draft Affordable Housing SPD was produced an Interim Policy Statement has been produced on First Homes. This sets out the Council’s position with regards to the implementation of First Homes. |

| Paragraph                                    | Original Text   | Text as Modified on Adoption   | Reason  |
|--|---|--|---|
|  | <p>national policies with regards to First Homes. In such circumstances, if a decision is taken that First Homes should be provided in an application, the 25% for First Homes should be taken from the 'other forms of affordable housing'. This is because the main need for affordable housing in the Borough is for rented accommodation. This will therefore have the impact of reducing 'other forms of affordable housing' such as Shared Ownership in the Borough but will not impact on the rented contribution.</p> | <p><del>Local Plan has been reviewed and updated), should either Planning Policy Guidance or a Ministerial Statement be issued that makes it clear that the First Homes policy requirement does apply prior to any subsequent Local Plan update, in calculating the number of units to be provided on any qualifying site, local decision makers will determine the relative weight to give local and national policies with regards to First Homes. In such circumstances, if a decision is taken that First Homes should be provided in an application, the 25% for First Homes should be taken from the 'other forms of affordable housing'. This is because the main need for affordable housing in the Borough is for rented accommodation. This will therefore have the impact of reducing 'other forms of affordable housing' such as Shared Ownership in the Borough but will not impact on the rented contribution.</del></p> |   |
| <p>New paras. added at 2.3.12 and 2.3.12</p> | <p>Not applicable.</p>  | <p><b><u>The Council expects applicants to be transparent, as far as practicable, at the application stage about the tenure mix proposed for a particular site. However, it is recognised that this is not always possible, as the tenure mix will often depend on what grant the provider is able to achieve. For sites with planning permission that later propose to include additional affordable housing on the site over and above the policy requirement of 35% set out in policy SL20 of the Local Plan, consideration will be given to the scale, location, tenure mix, local housing need, design, sustainability (energy efficiency), impact on infrastructure, and future management of the site.</u></b></p>  | <p>The Council is seeing an increase in the number of applications with 100% affordable housing. This results in no CIL payment being made for the sites. In the light of the recent Stonewater High Court ruling on this issue, the Council wishes to set out its position on this in the SPD.</p> |

| Paragraph                      | Original Text  | Text as Modified on Adoption   | Reason   |
|--------------------------------|--|--|--|
|                                |  | <u>For the avoidance of doubt, where the Council is minded to grant planning permission for a development proposal, S106 agreements will confirm the amount of affordable housing required to be provided on a site, in line with the application proposal before the Council. If an applicant wishes to amend their planning consent at a later date to propose additional affordable housing, a Deed of Variation will be required to vary the existing S106 agreement.</u>          |  |
| Para. 2.5.6                    | The Council has commissioned a consultant to provide a robust methodology to calculate affordable housing commuted sum requirements. The formulae for this calculation will, once it is complete, be available to view alongside the Affordable Housing SPD, on the Council's website. This will allow applicants to check upfront any commuted sum payments that are likely to be required in lieu of affordable housing for schemes that have been agreed with the Council or for applications that result in part of an affordable dwelling being required on site. | <u>The Council commissioned a consultant, BPS, to provide a robust methodology to calculate affordable housing commuted sum requirements in the Borough. The detailed report setting out how this formula has been derived is set out as Appendix 3 to this SPD. This approach should be followed by applicants for calculating any commuted sum payments that are likely to be required in lieu of on-site affordable housing for schemes that have been agreed with the Council.</u> | Factual update to allow for the fact that this work has now been completed.  |
| Para. 3.1.18<br>Third sentence | Any remaining disputes between the Council and the applicant will be referred to an independent arbitrator (in accordance with RICS guidance).   | <del>Any remaining disputes between the Council and the applicant will be referred to an independent arbitrator (in accordance with RICS guidance).</del>  | It is proposed to delete this wording as it is considered on reflection that it effectively places the decision on viability issues with a third party not the decision maker. |
| Para. 3.1.20                   | Additional text added at the end of the existing paragraph.  | <u>Where a viability case has been accepted on an outline planning application this should be reviewed at the reserved matters stage. For other non-policy</u>   | It is considered that additional text is needed to clarify the situation with regards to   |

| Paragraph                  | Original Text                                     | Text as Modified on Adoption  | Reason   |
|----------------------------|---|---|--|
|                            |   | <b><u>compliant schemes clawback or similar arrangement will be considered. Appropriate triggers for reviews at different stages of development or phases may be required in agreements.</u></b>  | planning applications and the viability review process.  |
| Heading above para. 3.1.21 | 'Indexation of Financial Contributions'           | <del>Indexation of Financial Contributions</del><br><b><u>Late stage viability reviews</u></b>  | On reflection it was considered that this heading more accurately reflects the wording contained in this section of the SPD.   |
| Para. 4.1.5                | New text added to the end of the paragraph.       | <b><u>A template Nominations Agreement is available from the Housing Department.</u></b>  | Additional wording requested to set out that a template nominations agreement is also available from the Council.              |
| Appendix 2                 | Template Affordable Housing Section 106 Agreement | The key changes include:<br><br>With regard to the changes made to the S106 Template, the main changes are:<br><br><ul style="list-style-type: none"> <li>• Amending the definition of Affordable Housing</li> <li>• Including a definition of First Homes</li> <li>• Adding a definition of Social Rented Housing dwellings</li> <li>• Amending the definition of SAMM to Strategic Access Management and Monitoring</li> <li>• Amending the definition of the Strategy to refer to the recently adopted Thames Basin Heaths SPD.</li> <li>• Included a definition of Affordable Housing for Rent.</li> <li>• The Interest rate for late payment was amended.</li> </ul> | A number of clauses in the s106 template have been changed to bring it in line with the Council's most recent s106 agreements. |

| Paragraph  | Original Text   | Text as Modified on Adoption  | Reason   |
|------------|-----------------|---|--|
| Appendix 3 | Not applicable. | This Appendix sets out the contributions cap work, undertaken for the Council by the consultants BPS, which forms the basis for the Affordable Housing Commuted Sum work which sits alongside the SPD on the website. | This work has been completed since the draft SPD was consulted on. |