RUNNYMEDE BOROUGH COUNCIL

AFFORDABLE HOUSING

SUPPLEMENTARY PLANNING DOCUMENT (SPD)

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

REGULATION 12 STATEMENT OF CONSULTATION

October 2021

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Purpose of this statement

1. This Consultation Statement outlines the ways in which stakeholders have been engaged in the preparation of the Draft Affordable Housing Supplementary Planning Document.

2. The Statement provides information on what meetings were held and consultation undertaken with local stakeholders with an interest in the delivery of affordable housing. It also summarises the comments received and confirms how the issues have been addressed in the draft Supplementary Planning Document (SPD).

3. This consultation has been prepared in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 12 which require that alongside the publication of a draft SPD, a statement should be prepared setting out:

   • The persons the local planning authority consulted when preparing the SPD;
   • A summary of the main issues raised by those persons; and,
   • How those issues have been addressed in the SPD.

4. This document is the Statement of Consultation for the draft Affordable Housing SPD and sets out the persons the Council engaged in preparing the SPD and how their comments have been addressed. A further Statement of Consultation will be produced following public consultation on the draft SPD and prior to 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[1]. 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.

7. The SPD <u>does not</u> 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.

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[1] Median workplace-based affordability ratios (Table 5c) 1997-2020 Officer for National Statistics

Stakeholder involvement in the draft SPD

8. A number of presentations and meetings were 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.

9. 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 12th October 2021.

   - On the 14th 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. These comments are also picked up in Table 1

   - A summary of the contents of the Affordable Housing SPD was sent out to 102 developers, agents, landowners and registered providers on the 14th 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 20th October 2021.

Main Issues Raised and how these issues were addressed

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

Table 1: RBC response to main comments raised in response to 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	It is intended to include a section setting out how this will be implemented in Runnymede Borough.
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 Register 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. 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.