

RUNNYMEDE BOROUGH COUNCIL

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

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

REGULATION 12 STATEMENT OF CONSULTATION

December 2025

Purpose of this statement

1. The Town & County Planning (Local Planning) (England) Regulations 2012 (As amended) ('the Regulations') set out in Regulation 12 that before a local planning authority adopts a Supplementary Planning Document (SPD), they must prepare a statement (Statement of Consultation) setting out:
 - 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 preparing the draft SPD.
2. This document is the Statement of Consultation for the Runnymede Borough Council update to the Affordable Housing Supplementary Planning Document (SPD) which occurred during the course of 2025. It sets out the persons the Council consulted in preparing the amended version of the SPD, and how their comments have been addressed during this process.
 - i. **Stakeholder involvement in the draft SPD – first consultation**
3. Officers in the Planning Policy Team were made aware, through Development Management colleagues, that developers were finding it increasingly difficult to sell affordable housing units on s106 sites to Registered Providers. This engagement, together with the publication in December 2024 of a new National Planning Policy Framework (NPPF), were key drivers for an update being made to the Council's Affordable Housing SPD.
4. A first round of public consultation was undertaken on proposed amendments to the Affordable Housing SPD between 9th June 2025 and 16th July 2025. The Planning Policy Team contacted all stakeholders (neighbouring local authorities, other organisations, members of the public, businesses and amenity groups) whose email addresses are held on the Planning Policy Consultation database about the consultation. In addition, letters were sent out to those who had asked to be contacted but who we didn't hold email addresses for. Appendix A of the Council's Statement of Community Involvement (SCI, 2021) details the bodies registered with the Council.
5. Additionally, the Planning Policy Team sought the views of councillors on the Planning Committee on the contents of the Update to the Affordable Housing SPD at the meeting held on the 28th May 2025, and again on the 24th September 2025 meeting.
6. The Planning Policy Team also publicised the consultation on the Council's website and distributed hard copy consultation documents in the Borough's libraries and main office at the Civic Centre in Addlestone, in accordance with the Council's Statement of Community Involvement (SCI).

7. In addition, as this SPD is an update to the existing Affordable Housing SPD which was adopted on 13th April 2022, much of the text within the SPD has been consulted on previously. The details of the consultation that was undertaken on the original Affordable Housing SPD are outlined in the [Statement of Consultation](#) from April 2022.

Second round of public consultation

8. A second round of public consultation was undertaken on the Update to the Affordable Housing SPD between Tuesday 30th September to Wednesday 29th October 2025. The reason for the second round of consultation was that some of the responses received to the first round of public consultation raised points that required further material changes to be made to the SPD. It was therefore considered that, prior to adopting the SPD, it would be advantageous to undertake another round of consultation, to ensure that those who had responded to the first round of consultation had a chance to see the Council's proposed responses to their comments, and respond to them if they so wished, before the SPD was adopted.
9. All the means of consultation undertaken previously for the first round of consultation, set out above in paras. 4, 5, 6, and 7 were repeated for this second round of consultation. However, in addition, the Council also undertook a paid social media campaign to publicise the Consultation and specifically contacted both the University of Surrey and the Royal Holloway University London.

ii. Summary of the main issues raised by stakeholders during the first round of Public Consultation on the Updated Affordable Housing SPD

10. 10 representations were received from external organisations to this public consultation and some internal comments from other departments within the Council were also received. A summary of the issues raised are set out in the table below, along with a column showing how these issues have been addressed in the revised SPD, or why no changes are considered necessary.
11. Some of the key issues raised in response to the consultation on this Update to the Affordable Housing SPD include the following:
 - The issue of the inclusion of 'additionality' within s106 agreements, was raised. 'Additionality' is where Registered Providers seek to maximise the number of affordable houses being delivered on a site by purchasing larger numbers of homes than specified in a development's s106 agreement, sometimes seeking to provide as much as 100% of the houses on a site as affordable housing.

- This can mean that the developer is able to use Homes England grant funding to deliver these additional affordable houses. Homes England grant funding cannot however be used to cross-subsidise dwellings to be delivered in a s106 agreement and consequently, one of the representors suggested that changes should be made to the Affordable Housing SPD, to require additional delivery to be brought inside the s106 agreement.
- Concerns were raised about the marketing requirements required in the Affordable Housing SPD with regards to vacant buildings. It was suggested that references to these marketing requirements should be deleted from the SPD.
- Concerns were raised about the viability requirements set out in the Affordable Housing SPD and in particular the fact that the SPD is asking for 'open book viability assessments' which the representor considers is advocating a developer specific approach, which is inappropriate and not in line with the PPG Viability requirements.
- Concerns were raised about the introduction of a late-stage review mechanism, in paras. 3.1.21 and 3.1.22 of the SPD, as the representor didn't consider this to be appropriate, as there is no mention of this approach in the adopted Runnymede 2030 Local Plan.
- It was requested that the definition of affordable housing on s106 sites should also include community led housing development and Custom Self-Build development sites. The representor suggested that custom/ self-builders get 6 months to submit an application to acquire these units and that alongside this, community led developers are given 12 months to acquire the land. Only after 12 months can Registered Providers acquire the units.
- The internal comments received to the consultation were mainly concerned with the wording of the Affordable Housing Template for the s106 and ensuring that these were the latest that they could be and reflected those used in recent s106 agreements agreed by the Council.

Summary of the main issues raised by stakeholders during the second round of Public Consultation on the Updated Affordable Housing SPD

12. 6 representations were received from external organisations to this second round of public consultation. A summary of the issues raised are set out in the table below, along with a column showing how these issues have been addressed in the revised SPD, or why no changes are considered necessary.
13. Most of the respondents who raised key issues during the first round of consultation did not respond during this second round of consultation. This could be because they

were happy with the amendments which had been made to the SPD to address their previous concerns. Two new areas of concern that were raised in response to this second consultation related to the following:

- Natural England asked if a reference within the SANG and SAMM contributions section of the S106 should include reference to these tariffs increasing with inflation; and
- Concern expressed that the proposed methodology for assessing an Affordable Housing Financial Contribution (AHFC) is not sufficiently robust for its purpose. A summary of the concerns related to the methodology and assumptions adopted are as follows:
 - Para. 2.5.6 of the SPD should be revised to remove reference to 'viable' as the Dixon Searle proposed methodology for financial contributions does not allow for the consideration of viability.
 - The AH SPD should provide clarification on the application of indexation to the proposed AHFC rate, including the relevant indices and applicable date range.
 - The Borough should be split into sales value areas in accordance with the CIL charging schedule to ensure the calculated AHFC is reflective of the market.
 - Build costs should be revised against the current BCIS average price index.
 - Affordable housing values should be revised, so they reflect the current market and
 - CIL should be adopted based on CIL zones, as set out within the adopted Charging Schedule.

Next steps

14. The Council has considered all the responses received during early engagement, and the two rounds of public consultation which have occurred on the proposed updates to the Affordable Housing SPD. A number of changes have been made to the proposed amended version of the Affordable Housing SPD as a result of these consultations.
15. A final version of the SPD will now be prepared and presented to the Planning Committee for consideration to adopt it. It is anticipated that the SPD will be presented at Planning Committee in December 2025.

iii. RBC response to main comments raised in response to the first round of public consultation held between 9th June and 16th July 2025.

Representor	Summary of Representation	Council's Response	Amend SPD?
Abri	We support the intention of paragraph 2.1.4, but note that in the case of outline planning applications it will not always be possible to be clear on how the potential affordable housing requirement from that development will be met, as acknowledged in paragraph 4.1.6. The reference to declaring an application invalid on the basis of not setting out the details of the affordable housing delivery should be clarified to refer to those applications in which the full detail of the housing number is known.	Agree that we could clarify this wording to include the following "If an application for 10 units or more (net), <u>this does not include outline applications</u> , does not set out how the affordable housing requirement will be provided, the application will not be validated and will be returned to the applicant.	Yes. Include additional wording as set out in red in the proceeding column in para 2.1.4.
	The intention for applicants to seek the latest template S106 from Legal Services is generally supported, however to lessen the burden on what is typically a very under-resourced department, it may be more useful to publish such information on the planning policy webpages.	The Council's Legal Services team were asked whether it would be beneficial to them to have the template s106, as a whole, i.e. not just the part that relates to Affordable Housing, put onto the Council's website. They advised that they prefer to keep things as they are currently, and not put the s106 template onto the website.	No change.

	<p>Many Registered Providers, in seeking to maximise the number of affordable homes being delivered, increasingly purchase larger numbers of homes than specified in a development's S106 Agreement, or the entire site. This has the benefits of delivering a larger quantum of affordable homes in a shorter period of time and allowing for the use of grant funding to deliver 'additionality'. As Homes England grant funding cannot be used to cross-subsidise dwellings to be delivered in a S106 Agreement it is important for any additional affordable homes to remain 'outside' the S106. This makes the Council's reference at 2.3.11 to requiring additional delivery to be brought inside the S106 Agreement challenging.</p> <p>As well as the often-lengthy delays that are incurred when seeking to vary a S106 Agreement it can be difficult to reach a mutual understanding of the reasons for keeping 'additionality' outside the S106, making template agreements a useful tool for all parties. Homes England provided the information appended to these comments in response to the need for general understanding on how 'additionality' can be captured in S106 without fettering the additional dwellings and so preventing the use of grant funding. We welcome discussion on this and suggest that the Council incorporates such wording into their template agreement for general use.</p>	<p>There is no policy requirement for additionality and therefore it is not included in our draft templates.</p> <p>However, if in the determination of an application, additional weight is given to the provision of additional affordable housing by the decision maker, and it is considered that this needs to be secured through a s106 agreement, such a clause can be incorporated at the time of drafting.</p> <p>Additionality also has implications regarding the provision of infrastructure and needs to be considered on a case-by-case basis.</p> <p>It is proposed to delete paragraph 2.3.11, which provides details on the s106 agreement and additionality and instead to amend the preceding paragraph (2.3.10) to make it clear that additionality cases will be decided on a case-by-case basis.</p>	<p>Delete para. 2.3.11 and add additional wording to para. 2.3.10 3rd line delete "as the tenure mix will often depend of what grant the provider is able to achieve" and replace with "due to funding arrangements" at the end of the paragraph add in the following "This will be considered by Development Management Officers on a case-by-case basis."</p>
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	Abri supports the proposed revocation of the First Homes Interim Policy Statement with up to date policy in this SPD.	Welcomed.	No change.
	We note that there is a minor typographical error in paragraph 1.2.4, in which reference is made to the annual affordable housing need as dwellings per hectare instead of dwellings per annum.	Agreed.	Wording to be changed from 'hectare' to 'annum'.
Historic England	No comments to make.	Noted.	No change.
Private Individual	<p>Rather than just deleting the preferred list of registered providers the Council should open up/ extend the definition on s106 sites to include Community Led Housing Development and Custom/ Self Build Development Sites. Once a s106 site has been designated to include affordable housing. The Council & Developer should:</p> <ol style="list-style-type: none"> 1. *Months 0 – 6 months : Give custom/self builders on the Councils' list up to 6mths to submit an application to acquire a piece of the land for their build 2. *Months 0 – 12 months: Give Community Led Developments up to 12 months to submit an application to acquire a piece of the land for their build 3. Months 12 onwards: Give Providers the option to progress the provision of 'Affordable Housing' <p>If no application of interest has been received from [1] & [2] within 3 months of notification then this option should be withdrawn & the option for 'Affordable Housing in the traditional sense [i.e.3] bought forward. Developers will not</p>	<p>The National Planning Policy Framework (December 2024) includes as Annex 2 a glossary. This glossary sets out what constitutes affordable housing. This definition does not identify either custom/ self-build development sites as a form of affordable housing and consequently it is not considered that this group can be given priority on sites acquired for affordable housing.</p> <p>The NPPF refers to community led housing in relation to exception sites. Runnymede doesn't have any such sites, and so it is considered that affordable housing sites in the borough should be retained for those most in need of affordable housing.</p> <p>In addition, the approach set out by the respondent would amount to the introduction of new policy, as there are no such provisions made within the adopted Runnymede 2030 Local Plan. Consequently, changes such as the ones proposed, would need to be made as part of the update to the Local Plan, and not within a Supplementary Planning Document.</p>	No change.

	financially lose out under [1] & [2] as they [with the Council] will agree the cost of land to groups 1 & 2 & ensure the design of these properties are in keeping with the Developments Design Code. Rather, this will mitigate Developer's financial risk/exposure, whilst fulfilling a Local Housing Need.		
Bluestone Planning	Para 2.6.2 states: " <i>The credit does not apply when a building has been abandoned or where a building has been made vacant for the sole purpose of re-development. Certain evidence will be required from applicants to demonstrate that the form and length of the marketing campaign has been appropriate. Evidence of a good marketing campaign should include.....</i> " and it then goes on to list marketing requirements. This is in direct contravention of the Planning Practice Guidance and the NPPF para. 65.	Policy IE3: Catering for Modern Business Needs of the adopted Runnymede 2030 Local Plan requires that before uses such as incubator uses, small warehousing units and small serviced office accommodation can be lost in the borough that comprehensive marketing must be carried out for 'at least one year'. The requirement to carry out marketing for abandoned or vacant sites was included in the 2022 version of the SPD to bring the two into alignment, and so as to ensure that buildings were not deliberately made vacant for the sole purpose of redevelopment. However, given the current policy climate and the emphasis to support brownfield redevelopment, it is considered that the provisions for marketing of such sites should be removed from the Affordable Housing SPD and that instead the Council should decide each application on a case-by-case basis relying on the advice set out within the Planning Obligations PPG (particularly para. 28).	Para. 2.6.2 it is proposed to remove the requirement to undertake marketing for sites eligible for Vacant Building Credit, and the subsequent details of what is needed to ensure a comprehensive marketing campaign will also be removed. The reference for the need for this marketing to be undertaken will also be removed from para. 2.6.3.
National Highways	Following a review of the Affordable Housing SPD, we are satisfied that this consultation does not directly impact National Highways or our network. However, we look forward to being	Noted.	No change.

	consulted on any planning applications for housing schemes that have the potential to impact the safety and operation of the SRN in the future.		
Natural England	Natural England does not consider that the Updated Affordable Housing SPD poses any likely risk or opportunity in relation to our statutory purpose and so does not wish to comment further on this consultation.	Noted.	No change.
The Planning Bureau Limited on behalf of McCarthy Stone and Churchill Living	<p>Paras. 3.1.12 & 14 We note that the council is seeking evidence from comparable development land sales and expect confirmation of the price paid for the property / land or the price expected to be paid together with any contractual terms or sale agreements or options agreements including overage provisions. Para 3.1.14 then confirms that the council would expect a 'full open book viability assessment'. It is important to note that the PPG clearly states that viability is not usually specific to individual developers. The draft SPD is suggesting a developer specific approach which is not appropriate and not in line with the PPG Viability requirements.</p> <p>Whilst the PPG states that an LPA may ask for detail of price paid for land, there is no obligation on an applicant to disclose that information. This is important given that price paid data is often influenced by a range of factors, some of which may be developer specific. The PPG is clear that viability assessment is not usually specific to a developer (para 021 Reference ID: 10-021-20190509). The PPG is the 'authoritative requirement' and simply describes a residual</p>	Disagree. The PPG (Viability para.16) sets out that "Local authorities can request data on the price paid for land (or the price expected to be paid through an option or promotion agreement)." Para. 21 of the PPG specifically states that "viability assessments should be prepared on the basis that they will be publicly available other than in exceptional circumstances ..." The Council is therefore of the view that what is being suggested within these two paragraphs is in line with the wording set out within the PPG.	No change.

	<p>approach, the PPG fails to set out what should be done with price paid information if available. Paragraphs 3 .1.12 and para 3.1.14 are therefore contrary to national policy in their request that developers should confirm the price paid for land and should be deleted.</p>		
	<p>Paras. 3.1.21/22 We note that para 3.1.21 and 3.1.22 seeks to introduce an affordable housing review mechanism (or late-state viability review). We also note that 'Runnymede 2030', the adopted Local Plan does not contain such a requirement.</p> <p>A review mechanism and any detail that will form part of it also needs to be considered fully and assessed through the Local Plan process. This should include the consideration of variables such as trigger points, costs, land values, how surplus is split and other definitions.</p>	<p>It is considered that since the Local Plan does not say anything about 'late-stage reviews' and the PPG on Viability specifically states in para. 009 that "Plans should set out circumstances where review mechanisms may be appropriate" that references to these late-stage reviews should be removed from the SPD.</p>	<p>These two paragraphs will be deleted from the Affordable Housing SPD i.e. 3.1.21 and 3.1.22.</p>
	<p>Section 2.6 Vacant Building Credit</p> <p>Section 2.6 of the draft SPD considers Vacant Building Credit in the realms of affordable housing provision. This confirms that the credit does not apply when a building has been abandoned or that where a building has been made vacant for the sole purpose of re-development. The SPD then introduces that the council will seek a marketing campaign of a site for commercial property for at least a year to show that the building is 'vacant'.</p> <p>However, it is our view that this marketing requirements at para 2.6.2 should be deleted as it was inconsistent with national policy including Paragraph: 028 Reference ID: 23b-028-20190315</p>	<p>See the above response to Abri who make the same point as well as the Council's response.</p>	<p>As set out above for Abri.</p>

	of PPG and para 65 of NPPF. The requirements in the SPD on Vacant Building Credit have not been justified with sufficient evidence.		
Rushmoor BC	We have no comments to make at this time, but please continue to notify us of future consultations.	Noted.	No change.
SCC	We have no comments regarding this document.	Noted.	No change.
Surrey Heartlands Health and Care Partnership	Section 3: Viability Health infrastructure provision is an integral component of sustainable development – access to essential healthcare services promotes good health outcomes and supports the overall social and economic wellbeing of an area. New development should therefore make a proportionate contribution to funding the healthcare needs arising from new development. Given health infrastructure's strategic importance to supporting housing growth and sustainable development, it should be considered at the forefront of priorities for infrastructure delivery, where the council is having to assessing viability implications on a case-by-case basis.	The importance of providing healthcare services alongside new housing development is acknowledged and is being picked up specifically as part of the Strategic CIL work. However, it is not considered relevant to include a specific reference in the template of the affordable housing element of the Section 106, as this template relates solely to the Affordable Housing provision and not the s106 as a whole.	For clarity, it is proposed that the wording at paras. 4.1.5 and 4.1.6 is amended to make it clear that "A Template of the affordable housing element of the Section 106 Agreement is attached as Appendix 2 to this document." Para. 4.1.6 is proposed to include reference to "The full Section 106 Agreement.
	Appendix 2: Healthcare provision The ICB note that the template includes definitions for infrastructure contributions, as well as affordable housing. We would request that a definition of Healthcare Contribution be added. We proposed the following definition and meaning.	See above.	Any references to infrastructure included in the template for the affordable housing section of the s106 have been removed. This includes references to SAMM and SANG contributions etc as the

	<p>“Healthcare contributions”</p>	<p>means a sum of [AMOUNT IN WORDS]</p> <p>(£AMOUNT)</p> <p>payable by the Owner to the</p> <p>Council and paid by the Council to the NHS Surrey Heartlands Integrated Care Board or successor bodies to be used towards the provision of health care facilities and/or associated infrastructure within the [relevant primary care network] of successor body.</p>		<p>intention is for the template to relate solely to affordable housing.</p>

RBC response to main comments raised in response to the second public consultation held between 30th September and 29th October 2025.

Representor	Summary of Representation	Council's Response	Amend SPD?
Active Travel England	Since 1 st June 2023 ATE has been a statutory consultee on all planning applications for new developments that meet or exceed one or more of its application thresholds. This statutory consultee role does not extend to plan-making consultations, therefore ATE does not respond to any consultations that it does receive.	Noted	No change
Savills on behalf of Bellway Homes Ltd	<p>The text below represents a summary of the key points covered in the response.</p> <p>The overarching concern that these representations consider is that the proposed methodology for assessing an Affordable Housing Financial Contribution (AHFC) of affordable housing is not sufficiently robust for its purpose.</p> <p>The letter sets out in detail their primary concerns surrounding the methodology and assumptions adopted in respect of the AHFC within the relevant AH SPD and relevant supporting documents.</p>	<p>The AHFC methodology is by its nature a 'one size fits all' broad brush approach, as indeed it is intended to be, with the principal aim being to simplify the setting of AFHC amounts in those exceptional circumstances where they are required.</p> <p>Payments in lieu are intended to be in exceptional circumstances, and in the normal scheme of things would only apply to a relatively small number of dwellings. At the current time there is a (hopefully temporary) issue around RPs not wanting to take on s106 units in some circumstances, which is leading to larger numbers of directly provided affordable housing dwellings potentially being replaced by financial contributions compared with the longstanding fairly low-key use of such sums.</p>	<p>No change to the overall approach of including the AHFC methodology into the Affordable Housing SPD but some changes to the text, as a result of this representation, are set out in more detail below.</p>

Representor	Summary of Representation	Council's Response	Amend SPD?
	<ul style="list-style-type: none"> Para. 2.5.6 of the SPD should be revised to remove reference to 'viable' as the Dixon Searle proposed methodology for financial contributions does not allow for the consideration of viability. The AH SPD should provide clarification on the application of indexation to the proposed AHFC rate, including the relevant indices and applicable date range. 	<p>This should not be the norm, and the AHFC rates should be at a level which a) does not incentivise this as an option and b) ensures that enough money is raised to provide an equivalent amount of affordable housing elsewhere.</p> <p>It is important to understand that this is not about viability per se, it is about broad policy equivalence. The AHFC will set the amount of commuted sum that is due reflecting policy, but if there is a claimed issue with the viability of the development itself (whether the Affordable Housing on site or with a payment in lieu) then this can and should be addressed through the usual route of viability appraisal and review – if needed.</p> <p>Agreed. The words 'the most appropriate or viable provision' in paragraph 2.5.6 are proposed to be deleted to provide the clarification requested and replaced with the word 'feasible' instead.</p> <p>Appendix 3 of the SPD, which set out the methodology for calculating the AHFCs, includes details of the indexation, however it is acknowledged that this isn't referred to within the text of the main SPD itself. Text is therefore</p>	<p>The SPD has been amended in para. 2.5.6 as set out in the previous column.</p> <p>The SPD has been amended at paras. 2.5.7 and 3.1.22 as set out in the previous column.</p>

Representor	Summary of Representation	Council's Response	Amend SPD?
		<p>proposed to be added to the end of para. 2.5.7 to say <u>The index figure to be applied will be the most recently published CIL index, which updates according to the BCIS Tender Price Inflation index relating to scheme costs – with the indexing rate now published annually here: RICS Community Infrastructure Levy (CIL) Index (Prepared by BCIS) BCIS . For clarity, this will apply from the date of implementation of the amended SPD which is 7th January 2026</u>. It is also proposed to amend para. 3.1.22 to clarify the method of indexation and to make it clear that this will apply from the date of implementation of the amended SPD. The proposed new wording for this paragraph is <u>The £300/m² rate will be index linked from the date of implementation of the amended version of this SPD, which is 7th January 2026. Indexation will be set out within the Section 106 agreement and will be aligned with CIL indexing, which updates according to the BCIS Tender Price Inflation index related to scheme costs, -with the indexing rate now published annually here : RICS Community Infrastructure Levy (CIL) Index (Prepared by BCIS) - BCIS</u>. The previous text has been deleted this includes “method of indexation will be negotiated with the applicant and once agreed, will be specified within the Section 106 agreement” and “The method will generally be based on the published Retail Price Index (RPI) or an</p>	

Representor	Summary of Representation	Council's Response	Amend SPD?
	<ul style="list-style-type: none"> • The Borough should be split into sales value areas in accordance with the CIL charging schedule to ensure the calculated AHFC is reflective of the market. 	<p>appropriate index published by the Build Cost Information Service (BCIS), which is the responsibility of the RICS.”</p> <p>In addition, Appendix 3 of the SPD is also proposed to be amended by adding at the end of the first sentence on page 41 under the heading ‘Indexation’ “<u>from the date of implementation of the SPD, which is 7th January 2026</u>” and also adding the link to the BCIS website (see above).</p> <p>Report 1 – January 2025 from DSP reviews a number of different approaches for assessing Affordable Housing Financial Contributions. A decision was taken, following a meeting with DSP, to follow the approach set out in the updated Affordable Housing SPD. However, the Council asked DSP if, as part of developing this approach they could consider splitting the borough based on house prices, in a similar way as is suggested in this representation. DSP acknowledge this request in para. 1.2.4 of Report 2 – March 2025. Paras. 2.2.6- 2.2.9 of that report sets out the reasons for not taking that approach. This can be summarised as being because in DSP’s view CIL is already adjusting for differences in site values in these areas and that DSP do not consider it necessary or appropriate to overly complicate this exercise and its findings in this way.</p>	No change.

Representor	Summary of Representation	Council's Response	Amend SPD?
	<ul style="list-style-type: none"> Build costs should be revised against the current BCIS average price index. Affordable housing values should be revised, so they reflect the current market and CIL should be adopted based on CIL zones, as set out within the adopted Charging Schedule. 	<p>The AHFC study is not akin to a Local Plan Viability Study in scope or depth. Rather it relates to the adopted policy, and as such, appropriately refers back to the available Local Plan viability assumptions with which it should seek to create equivalence. To go into the level of detail that the representor is suggesting is required in order to guide AHFCs would effectively involve a full viability study which might then not be consistent with the adopted plan basis.</p> <p>See the response to this respondent (above) which deals with this point.</p> <p>This appears to be referring to the same point as covered by bullet point three above. The answer is therefore the same as the one set out above too.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>
Natural England	<p>Natural England advise that the references within the SPD to SANG and SAMM contributions should include reference to these tariffs increasing with inflation.</p> <p>Natural England does not consider that the Updated Affordable Housing SPD poses any likely risk or opportunity in relation to our statutory</p>	<p>In Appendix 2, all references to infrastructure in the template for the affordable housing section of the s106 have been removed. This includes references to SAMM and SANG contributions as the intention is for the template to relate solely to affordable housing.</p>	<p>No change.</p>

Representor	Summary of Representation	Council's Response	Amend SPD?
	purpose and so does not wish to comment further on this consultation.		
Fisher German LLP on behalf of National Grid Electricity Transmission (NGET)	<p>Currently there are no known new infrastructure interactions within the area, however demand for electricity is expected to rise as the way NGET power our homes, businesses and transport changes. As the nation moves towards net zero, the fossil fuels that once powered the economy will be replaced with sources of low-carbon electricity, such as offshore wind farms.</p> <p>The way NGET generate electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy such as new offshore windfarms. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea.</p> <p>Accordingly, we request that the Council is cognisant of the above.</p>	As set out in the response above to Natural England, all references to infrastructure have been removed from Appendix 2 of the SPD, which sets out the s106 template relating to affordable housing. This response is noted but is not considered to require any changes to be made to the SPD.	No change.
Surrey County Council	We have no comments to raise.	Noted	No change

Representor	Summary of Representation	Council's Response	Amend SPD?
Spelthorne Borough Council	<p>1. Affordable Housing Tenure and Mix</p> <ul style="list-style-type: none"> The proposed 70:30 tenure split (rented: other affordable) aligns with Spelthorne's emerging policy direction. We support the emphasis on social rent tenure. The SPD's use of SHMA-derived mix requirements is noted. Spelthorne is in the early stages of undertaking a Housing and Economic Development Needs Assessment (HEDNA) and our consultants will engage with Runnymede officers to ensure consistency in housing needs assessments across the Housing Market Area. <p>2. First Homes Policy</p> <ul style="list-style-type: none"> We note the revocation of Runnymede's Interim Policy Statement on First Homes and the integration of guidance into the SPD following the 2024 NPPF update. <p>3. Commuted Sum Methodology</p> <ul style="list-style-type: none"> The adoption of a simplified £300/m² GIA-based calculation for off-site contributions is noted and provides clarity. <p>4. Vacant Building Credit</p> <ul style="list-style-type: none"> Support the SPD providing a clear and practical framework for applying Vacant Building Credit, including robust evidence requirements. <p>5. Viability and Clawback Provisions</p> <ul style="list-style-type: none"> The SPD's detailed viability testing framework and clawback mechanisms 	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>No change.</p> <p>No change</p> <p>No change.</p> <p>Response welcomed.</p> <p>Response welcomed</p> <p>Response welcomed</p>

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	<p>are supported. These provisions help safeguard affordable housing delivery and ensure policy compliance over time.</p> <ul style="list-style-type: none"> Support the principle of prioritising affordable housing where justified and encourage continued engagement on best practice in viability assessment. <p>6. Design and Integration</p> <ul style="list-style-type: none"> The SPD's emphasis on tenure-blind design, integration of affordable units, and alignment with Homes England standards is supported. Spelthorne has developed its own Design Code and welcomes opportunities to share learning. 	<p>The opportunity to share knowledge of the Design Code and the different approach adopted in each authority is welcomed.</p>	<p>Response welcomed.</p>
Internal comment from the Development Management Team	<p>Asked if the 10% additional charge on the Commuted Sum payment, as referred to in Appendix 3 of the SPD could be highlighted within the main body of the SPD too.</p>	<p>Agreed. Wording is proposed to be added at the end of para. 2.5.7 to state that "<u>In addition, as set out in Appendix 3, the Council will apply a 10% enabling / on-cost to the indexed sum to cover the costs involved in ensuring that the monies are used to provide much needed affordable homes or fund other projects that assist the delivery of them.</u>"</p>	<p>Additional wording added to the end of para. 2.5.7 to address this point.</p>