Runnymede 2030 Local Plan Examination

Responses to the Inspector’s Matters and Questions for the Stage 2 hearings (matter 8)
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## Appendices

- Appendix 1-Amended trajectory (as of 1st January 2019)
- Appendix 2-Housing memorandum
8.1 Is the Plan based on robust evidence about the housing land supply for the period up to 2030? In particular:

a) Is the estimated supply from extant planning permissions, windfalls and prior approvals justified and based on reasonable assumptions? Does the methodology avoid the risk of double-counting? Is the approach to lapse rates for planning permissions robust? Should lapse rates be applied to site allocations?

**Extant planning permissions**

8.1 If a site has been granted planning permission, it is considered entirely reasonable to include the proposals in the housing land supply. This is in line with paragraph 47 bullet point 2, footnote 11 of the 2012 NPPF which confirms that,

‘To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans’

8.2 For any sites granted planning permission that have not yet commenced, a non-implementation rate of 15% has been applied (see paragraphs 8.5-8.9 for more information about the derivation of the lapse rate).

**Small-scale windfalls and prior approvals**

8.3 The approach taken to the contribution that small-scale windfalls (4 net dwellings and below) and prior approvals can make to the housing land supply is considered to be justified as these elements of the housing supply have made a steady contribution to supply over a number of years and the Council has had no indication from regular reviews of its monitoring data that a contribution from these sources will not continue. For each supply source, as explained in the Council’s response to the Inspector’s Initial Note appendix 3 *(RBCLP_02)*, the average delivery over a five year period has been calculated, based on completions and this has been included the housing trajectory. As set out in the January 2018 SLAA *(SD_006G)*, an assumption has been
made that the supply will decrease over the longer term, which is itself based on the findings of the Inspector of the Wick Road Public Inquiry (APP/Q3630/A/13/2192120), who had suggested on an arbitrary basis that a 20% reduction over the longer term would be suitable; however, as the Council to date has not seen a large drop in housing supply from these sources, an adjusted figure of 15% reduction has been applied. Therefore, the approach to these elements to the housing supply is considered to be justified and based on reasonable assumptions.

Double counting

8.4 In terms of the methodology used, the Council can confirm that double counting is avoided. The allowances for small-scale windfalls and prior approvals included within the trajectory are based on completions only. Specific named sites listed in the housing trajectory are of five net dwellings and above and so small-scale windfalls and prior approvals only features in the trajectory in rows 103 and 104 (please see amended trajectory contained at appendix 1).

Lapse rates

8.5 With regards to how this data is accounted for in table 2 of the submission Local Plan, the Council submitted in its response to the Inspector’s Initial questions (RBCLP_02, qu6) and appendices (RBCLP_02, appendix 2) the composition of each row in the table, which also, in the Council’s view, shows that there is no double counting.

8.6 Considering non-implementation or lapse rates is a useful tool in determining a realistic housing supply. The data used to identify the non-implementation rate that has fed in to the January 2018 Strategic Land Availability Assessment (SLAA) (SD_006GL) was based on comparing granted planning applications in Runnymede between 2010 and 2013 against completions between 2010 and 2016. Any application that was granted but expired within three years was considered to be a non-implementation. These sites were then reviewed and if there was a subsequent live application on a site, this was removed from the non-implementation calculation.

8.7 The table below summarises the data collated. For the purposes of the SLAA, the average % of units expired was used to inform housing supply calculations. From the table, it is shown that this locally derived data amounts to around 15%.
Table 8.1: Calculation of expired planning applications

<table>
<thead>
<tr>
<th>Type of development (no. units) (Net)</th>
<th>No. units granted</th>
<th>Expired units-</th>
<th>Units expired %</th>
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<td>Small-scale windfall (1-4)</td>
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<td>10</td>
<td>7.6</td>
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<tr>
<td>Small (5-10)</td>
<td>80</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Medium (11-50)</td>
<td>119</td>
<td>53</td>
<td>45</td>
</tr>
<tr>
<td>Large (51+)</td>
<td>104</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Total (average)</td>
<td>434</td>
<td>63</td>
<td>14.5</td>
</tr>
</tbody>
</table>

8.8 It is considered that the approach taken to non-implementation by using locally derived data to determine an appropriate level across the board for lapse rates is robust.

8.9 With regards to applying lapse rates to allocations, the Council does not consider this to be necessary as the sites are considered to be viable, as set out in the Viability Assessment (ID SD_013A) and detailed information has been provided by the landowners/agents in relation to the majority of the sites through the Local Plan preparation process.

8.10 Further, the Council’s discussions to date with the allocation landowners/agents (see Council’s response to question 6.3, particularly the information set out in table 6.2) sets out that on a number of allocations, planning applications have already been submitted, and in some cases approved. Even where this is not the case, a number of the sites have been subject to pre application discussions which gives the Council confidence that the allocations will be delivered when expected and as set out in the Council’s housing trajectory.
b) Is there a sound basis for the expected contribution from Class C2 older people's accommodation to the Class C3 housing supply?

8.11 The expected contribution from Class C2 older people’s accommodation to the C3 housing land supply is considered to be justified by locally derived evidence gathered by the Council during the Plan preparation process. This locally derived evidence is described in paragraph 37 of the Council’s 2018 SLAA which confirms that the ratio applied for the purpose of the trajectory is based on questionnaire responses obtained from local care providers in the Borough.

8.12 The Council’s approach is considered to be further supported by the approach that the Government has incorporated into the Housing Delivery Test as set out in the Housing Delivery Test measurement rule book¹ where a contribution from communal accommodation, including those establishments for older people, is included in calculating the number of net homes delivered in a local authority area. The ratio applied for the purposes of the Housing Delivery Test is 1:1.8 based on the average number of adults in all households which is not dissimilar to the 1:3 ratio applied by the Council.

c) Are the estimates of site capacities (for the site allocations/opportunity areas, SLAA sites and estates regeneration) robust, taking account of viability, infrastructure and any other delivery constraints? [Note: the details of individual sites will be considered under Matters 6 and 7]

8.13 The Council considers that the site capacities for its allocations, opportunity areas, SLAA sites and for estates regeneration are robust.

8.14 In terms of the allocation sites in Policies SL2-SL18 and Longcross Garden Village, site capacities were tested through the Site Capacity Analysis (SD_011A & B). The Capacity Analysis considered how much development a site could accommodate having regard to the site size, any constraints or features which would limit development and the requirement for any specialist housing. The Capacity Analysis also makes assumptions in terms of housing mix and occupancy which in turn is used to calculate on-site green infrastructure requirements. Taken together, the net developable area of a site gives an indication of how many dwellings could be accommodated and the net & gross density which can be compared to the surrounding area. In this way the Capacity Analysis takes account of infrastructure and other delivery constraints for each site.

8.15 The assumptions used to calculate the developable area of a site in the Capacity Analysis are considered to be reasonable, consistently applied and robust. How these assumptions were derived is explained in paragraphs 2.1 to 2.20 on p3-7 of SD_011A. Commentary for each site in the Capacity Analysis (SD_011A & B) also explains how the assumptions were applied to calculate net developable area.

8.16 The capacity of opportunity areas in Policies IE7-10 and IE11 has been based on evidence in the SLAA which itself considers site size, constraints and suitability, as well as information contained in the Chertsey and Egham Town Centre masterplans (SD010A and B).

8.17 Each of the allocation sites including Longcross Garden Village are considered to be viable at the capacity set out in the Local Plan. This is evidenced in Section 4 p22-64 of SD_013A, p5 of SD_013B and in scenarios 1-6 on p82-89 of SD_007P. Three of the 4 opportunity areas contained in policy IE11 (Chertsey, Egham Library and High Street North) are largely in the ownership of the Council. The Council has identified no viability issues which would affect the delivery of these sites. The fourth opportunity
area at Strodes College Lane is in private ownership but has been subject to various planning applications over recent years (including one granted consent which has since lapsed, and a current application which is under consideration by the Council). Again, through the application process, the Council has not become aware of any viability issues which are likely to prevent the site from coming forward for development.

8.18 The sites in the SLAA with planning permission in place are expected to come forward for the capacity permitted and this is considered to be a reasonable assumption to make. SLAA sites which are not allocated for development and which do not have permission but which are projected to come forward over the Plan period are either located within the urban area or are on Previously Developed Land (PDL) in the Green Belt. The methodology for considering the capacity of SLAA sites is set out in paragraphs 15-17 on p7 of the SLAA Report (SD_006G) and in addition for PDL Green Belt sites consideration was given to paragraph 89 bullet 6 of the NPPF 2012 (para 145(g) of the NPPF 2018). Regard was also had to paragraph 017 of the Planning Practice Guidance note on Housing & Economic Land Availability Assessment. This is considered to be a reasonable, proportionate and robust approach and consistent with the Government’s advice on carrying out land availability assessments.

8.19 A viability assessment for each unallocated and non-permitted SLAA site has not been undertaken per se, however the Viability Whole Plan Testing (SD_013A) considered the viability of a notional 1ha site over a range of densities to reflect brownfield/greenfield locations. The viability testing did not report any viability issues. The Viability Report also tested the viability of smaller sites (under 10 units) and even with affordable housing provision (which the Council is not proposing given paragraph 63 of the NPPF 2018) sites were found to viable. The Council therefore has confidence that the SLAA sites identified and without planning permission are viable for the capacities stated.

8.20 In terms of estates regeneration, the Council’s Housing Department is pursuing a larger Estates Renewal programme at a significant scale. Since 2015 Feasibility and masterplanning studies have been undertaken on two Estates to establish capacity and a third estate has also been identified to present opportunities. This work confirms that nearly 4 and a half hectares of land should be brought forward as developable land which would deliver a net increase of 299 homes, of mixed tenure and size, with the expectation to have between 160 and 180 new homes delivered within the Plan.
Period or even if assuming an under-delivery of 15%, 145 new additional dwellings.

8.21 Preparatory work has already commenced on the programme with pre-application plans for the first phase, intended to deliver around 40 net dwellings, being undertaken. Work with a development partner is continuing to ensure this programme is delivered. Land assembly has been progressed, with properties previously lost through ‘right to buy’ bought back, and the opportunity taken to convert permanent tenancies to occupation as Temporary Accommodation wherever possible. Currently 31 of the under 200 dwellings within the Estates are now converted to Temporary Accommodation or held to be let by another provider to ensure any future decanting will not impede the development work. Throughout this work, careful consideration has been given to the viability of proposals on the assumption that 20% of the net new homes would be market housing with the remaining 80% delivered as Affordable Homes to meet identified needs.
d) Is it realistic to expect shortfall in delivery of housing requirement from start of plan period will be made up within 5 years of Plan's adoption? If not, how should the Plan address this matter?

8.22 Notwithstanding the further discussions that will take place in relation to the A320 at a later stage of the Examination in Public process, the Council believes it to be realistic that the shortfall from the beginning of the Plan period can be delivered in the first five years of the Plan. The current shortfall in the updated housing trajectory at appendix 1 shows that up to 2019/20, there will be a deficit of 433 dwellings provided against the need since the Plan period begun. To be delivered in the five year period post-Plan adoption, this would equate to providing approx. 86 additional dwellings per year. Added to the Plan requirement of 498 dwellings, approx. 584 dwellings would need to be delivered per year for five years, commencing 2019/20.

8.23 Added to this is the requirement to add a flexibility buffer of 20% or 5% depending on past delivery. This means that the Council would need to deliver 701 dwellings per year or 614 dwellings per year.

8.24 The Council’s amended housing trajectory at appendix 1 sets out which sites would contribute towards the five year housing supply (commencing in 2019/20) and sets out the annual delivery of dwellings. The housing supply for the next five years is 4148 dwellings, an average of 829 dwellings per annum, which would be able to meet the Plan requirement, accumulated shortfall from the early part of the Plan period and a flexibility buffer of 5 or 20%.
e) Is it justified to add a 20% buffer to the housing land supply to guard against any under-delivery of sites?

8.25 Until such time that the Government announces the results of the Housing Delivery Test, the Council must assume it is a 20% Authority. However, from the Council’s own analysis of the requirements of the Housing Delivery Test, this suggests the Council would become a 5% Authority, given that over the previous 3 years the Council has delivered more than 95% of the housing requirement against which the Housing Delivery Test is assessed. It is this 95% figure, as set out in the new NPPF as being the determining factor in whether a local authority would need to produce an action plan. Depending on the figures that DCLG use, Runnymede’s housing delivery would be between approx. 98% and 115%.
8.2 Is the most recent housing trajectory founded on credible evidence about the deliverability and achievability of the proposed development on the identified sites and other sources of supply within the expected timescales? Can there be reasonable confidence that a rolling 5-year supply of deliverable sites will be maintained from the date of the Plan's adoption?

8.26 The most recent housing trajectory can be found at appendix 1. In producing the housing trajectory, the Council has reflected progress to date on the Local Plan allocations (see table 6.2 in Council’s response to Inspector’s matter 6 questions) and the information obtained from landowners/agents about the deliverability of these sites is considered to be credible. In terms of the achievability of these sites, from a viability perspective, the Local Plan Viability Assessment (SD_013A) shows that the development proposed for these sites can be achieved. Further, from a ‘whole plan viability’ perspective, the findings of the assessment were that, on the basis of consideration of a range of factors, a 50% Affordable Housing target across the board would not hold back housing supply generally. These findings were based on the knowledge of the consultant, working in conjunction with the Council and through a developer workshop (using the Council’s Development Market Panel (DMP) which is made up of members who are not just local developers, but also those with land interests, land promoters and local property agents). It was considered that this method provided robust evidence.

8.27 For other sources of supply, officers have been engaging with the Council’s housing department to determine estate regeneration opportunities on land owned by the Council and likely timescales for development (see appendix 2-Housing memorandum). It is considered that the estate regeneration proposals are deliverable and achievable and a planning application is expected to be submitted for the first 40 dwellings imminently.

8.28 For other sites included in the housing trajectory, a number have received planning permission and are currently under construction.

8.29 There are also sites that have extant planning permission but have not yet started. There is no reason to believe at this stage that these sites will not come forward. Sites included within the trajectory that do not have an extant permission have been promoted through the SLAA call for sites and/or through the Local Plan consultation process. Any sites not promoted for three years are removed from the SLAA.
are also a limited number of sites that are not allocated through the Local Plan but which have engaged in pre-application discussions with the Council. With these sites, where no development has occurred, it is important to note that from a deliverability perspective, the footnote included within the 2012 NPPF sets out that sites should have a ‘realistic prospect of being delivered in the five year period to be included in the five year housing land supply’. In case law, St Modwen v SSCLG 2017, Lord Justice Lindblom confirms that, in the context of the NPPF, it does not need to be certain or probable that the site actually will be delivered within five years. However, in taking a cautious approach, the vast majority of sites without an extant planning permission have not been included within the five year housing land supply. As set out in the previous response at 8.1a, a non-implementation discount has also been applied to non allocated sites without planning permission and those with planning permission but not started, which, taken together, in the Council’s opinion provides a realistic housing trajectory.

8.30 It is on the basis of the above that the Council considers that the evidence is credible in setting out the deliverability and achievability of sites in the trajectory and in the timescales suggested, whilst also taking a cautious approach that helps inform a realistic housing trajectory.

8.31 With respect of there being reasonable confidence that a rolling 5-year supply of deliverable sites will be maintained from the date of the Plan’s adoption, any five year period can be looked at in the Council’s housing trajectory to determine whether a five year supply can be delivered. From 2023/24 when certainty towards the end of the Plan period reduces, this is when the five year supply cannot be demonstrated at this stage.

8.32 The full housing need is met across the Plan Period. However, in support of the Government’s desire to substantially increase the number of new homes and hasten the pace of delivery, the supply of homes is front loaded within the overall plan. The significant over-delivery in the first half of the plan period means that fewer completions are currently anticipated post-2023/24. Notwithstanding this, it will not be until 2027/28 that the predicted housing supply will fall below the 498 average dwellings for the previous three years (the relevant period for the new Housing Delivery Test). At this stage, a full plan review will have occurred and any adjustment to housing need or Action Plan to maintain delivery can be accommodated.
8.33 The Council is confident that other sources of supply will continue to come forward and that appropriate account has been taken of possible reduction over time of these sources. Given all of the above, there can be confidence that a rolling five year supply will be maintained until the latter stages of the Plan, by which time at least one review of the Local Plan will have taken place. The Council is satisfied that this approach, securing early delivery of homes, is preferable to requiring delay in delivery of otherwise deliverable sites simply to maintain the rolling supply.
8.3 Does the Plan provide sufficient information about the housing implementation strategy? Should it include a housing trajectory in graphical and tabular forms?

8.34 The Council is satisfied that sufficient information about the housing implementation strategy is provided in the Submission Local Plan (CD_001). Policy SD2 and SD3, and the explanatory text thereto, details the precautionary approach and assumptions used in the delivery strategy for new homes. The Council would suggest that this is sufficient to provide confidence in the implementation of the Plan.

8.35 The Council does not feel that the housing trajectory should be included in the Plan, in either graphical or tabular form. The trajectory is a live document, updated by annual call for sites work and monitored through the AMR. It should and will, be published as part of that monitoring work.
<table>
<thead>
<tr>
<th>C3 Site</th>
<th>Description</th>
<th>Specialist Occupier</th>
<th>C3 Site 15% Discount</th>
<th>Delivery against target</th>
<th>Deficit/excess</th>
<th>Target</th>
<th>Total</th>
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**Notes:**
- Traveller pitches/plots
- Student
- Windfall
- Prior approval (large and small)
- 15% discount

**Financial Summary:**
- Target: 7,747
- Delivery against target: -130
- Deficit/excess: -130

**Other Information:**
- 15% discount on certain C3 sites for non-implementation
- Prior approval (large and small)
- Total: 7,747

**References:**
- Brunel University Site, Coopers Hill Lane, Englefield Green
- Chertsey Bittams - (Parcel D - Parklands)
- Queen Elizabeth House, Torin Court, Englefield Green
- Lower Longcross
- Cemex House
- Brockhurst
- Bourne Car Park
- Fermoyle 32 and 1 c3
- 17 & 18 Thorpe Road, Staines

**Specialist Occupier Notes:**
- Numbers in brackets represent the C3 equivalent
- Completions
- Specialist older 15% discount
- Windfall and prior approval
- Total: 7,747
MEMORANDUM

Date: 10 January 2019

To: Ian Maguire, Corporate Head of Planning and Environmental Services

From: Maggie Ward, Head of Housing

Re: Estates Regeneration

Mr Maguire,

Further to our discussions during the formation of the Local Plan 2030 I am writing to assist with the response to the Inspectors Matters and Questions for Stage 2 hearings, and in particular Matter 8.1c, the robustness of evidence for the estimate of site capacity for estates regeneration.

Runnymede Borough Council Housing Department has commenced a review of our Housing Estates wherein the majority of our almost 3,000 retained housing stock are located. While we have successfully brought a small number of opportunity sites forward in the 2018/19 year we have continued to pursue a larger Estates Renewal programme at a more significant scale.

Since 2015 Feasibility and masterplanning studies have been undertaken on two Estates that intend to be brought forward as part of the Renewal programme. Due to the sensitivity of publically specifying the Estates, which would have adverse impacts on continued land assembly and relocation of families into these areas, I am however unable to confirm the locations at this time. Notwithstanding this to support the Local Plan and demonstrate that the evidence underpinning the capacity evidence is robust I can provide further details of the programme. I can confirm that the identified Estates are considered in need of Renewal and, through discussions with the Planning Department are considered to be located in an area well served by local amenities and access to sustainable modes of transport.

The Council has commissioned an Initial Feasibility Assessment and early masterplanning work to establish the capacity of the two identified Estates. This work confirms that nearly 4 and a half hectares of land should be brought forward as developable land within the Renewal programme, and this would deliver a net increase in housing, or mixed tenure and size, of 299 dwellings. As such programmes are complex, needing to be delivered over a number of phases to enable construction and decanting of existing residents we have cautiously assumed that this can be completed over a 20 year period. This would mean we would expect to have between 160 and 180 new homes delivered as part of the Estates Regeneration work within the Runnymede 2030 Plan Period (11 years).
I note that you have however added additional caution within the Plan’s Spatial Development Strategy by assuming an under-delivery of this intention by 15%, meaning 145 new additional dwellings are anticipated by 2030. This amount seems very deliverable and the Council’s Housing Department is confident in meeting this intended growth within the two Estates that are being progressed.

Preparatory work has already commenced on the programme with pre-application plans for the first phase, intended to deliver around 40 net dwellings already discussed with the Planning Department’s Development Management Team.

Land assembly in the wider two estates has also been progressed with properties previously lost through the ‘right to buy’ being bought back on the open market. To date 3 dwellings have been bought back in the effected Estates. The opportunity has also been taken to minimise delivery risks by converting properties as they become vacant from permanent tenancies to occupation as Temporary Accommodation, so that once decanting commences fewer families and tenancies need to be disrupted. Currently 31 of the under 200 dwellings within the Estates are now converted to Temporary Accommodation for this reason.

Work with a development partner, and with the Council’s Planning Department is continuing to ensure this programme is delivered. Throughout our work we have given careful consideration to the financial viability of the proposals and we continue to explore the opportunities to support delivery with both our own Housing Revenue Account Reserves and Government Grants for Affordable Housing. We do recognise however that it may be financially necessary, and socially advantageous through the creation of more mixed communities to include within the Regeneration some private sector housing. We are therefore assuming that 20% of the net new homes would be market housing with the remaining 80% delivered as Affordable Homes to meet identified needs.

I trust that this information summary provides the confidence necessary to demonstrate that the capacity assumptions used to establish the housing contribution through Estates Renewal are robust and reasonable and this will provide the Local Plan Inspector with the assistance they require.

Yours sincerely

Maggie Ward
Head of Housing – Runnymede Borough Council