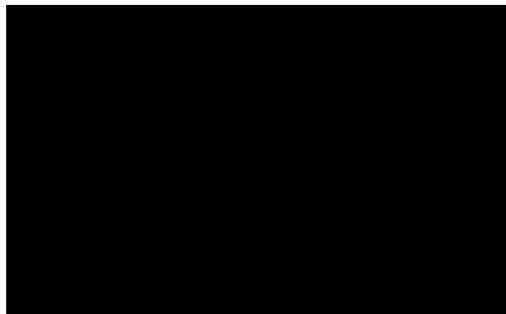


Our ref: Q200189
Your ref:
Email: tom.dobson@quod.com
Date: 6th April 2020



The Planning Policy & Economic Development Team
Runnymede Borough Council
Runnymede Civic Centre
Station Road
Addlestone
KT15 2AH

By email

Dear Sir/Madam,

Runnymede CIL Draft Charging Schedule

1 Introduction

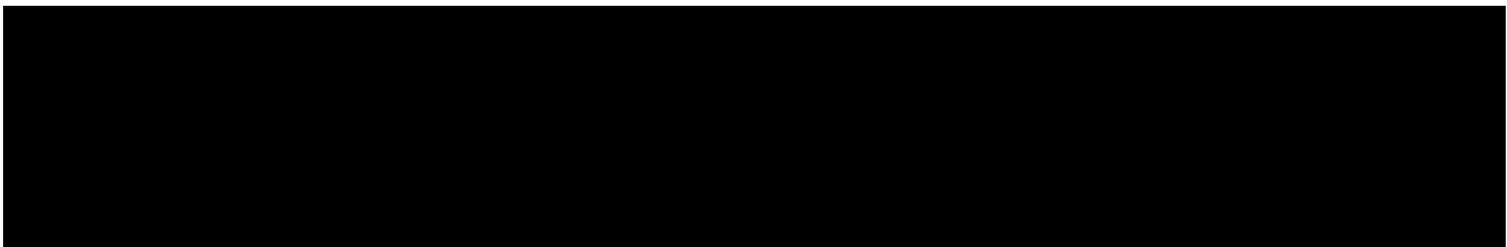
I am writing on behalf of [REDACTED] to make representations in relation to the Consultation on your Draft Charging Schedule (DCS) for the Community Infrastructure Levy in Runnymede.

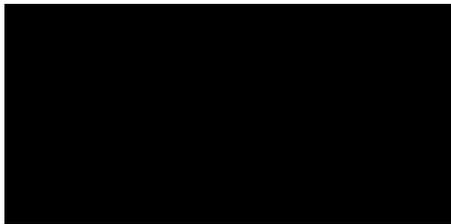
[REDACTED], the joint venture between [REDACTED] and the [REDACTED], has an interest in a site in North East Ottershaw. A plan showing the location of the site is appended. This site is located adjacent to Junction 11 of the M25 south of St Peters Way. [REDACTED] has made representations to the current Local Plan Inquiry that the Plan period should be extended to 2035 and that additional sites should be allocated, including this site to make the Plan sound. Should this not happen St Edward has suggested an immediate plan review will be necessary to address the area's need for homes over an appropriate period as required by Government policy.

The Council is also consulting on its draft Infrastructure Delivery & Prioritisation SPD, which identifies the approach the Council intends to take to securing Planning Obligations alongside CIL. We have submitted representations to this document on behalf of [REDACTED], which we append to this letter. The two sets of representations should be read together.

In summary the conclusions are:

- [REDACTED] welcomes the Council's approach of developing its CIL Charging Schedule and Planning Obligations policies in parallel with Local Plan development based on evidence from its Infrastructure Delivery Plan. This follows good practice and, in principle, allows the deliverability of sites to be properly considered;





- The Viability Study which is intended to provide the ‘appropriate available evidence’ is not transparent in its assumptions and does not make clear its inputs, particularly for larger sites. It would be helpful if the Council could publish these inputs and allow respondees to comment on them;
- The Viability Study analysis of large sites does not include a site or typology of the size of the North East Ottershaw site (ie 650 to 850 homes), with a gap between 275 homes scheme at Chilsey Green Farm and 1,500 homes at Longcross Garden Village. Sites above 500 homes typically have greater on-site infrastructure requirements – which the Draft SPD says will continue to be secured through S106 obligations – and also have greater opening up costs and take longer to develop. Charging full CIL rates in addition to Section 106 requirements for such sites renders them unviable;
- The Charging Zone boundaries in the Draft Charging Schedule do not follow the sub-market boundaries shown in the Map at paragraph 3.7 of the Viability Report, but appear to have been drawn to also take into account some housing sites. This includes the Chertsey Bittams and St Peter’s Hospital sites, which are immediately adjacent to [REDACTED] North East Ottershaw site. They therefore have similar value characteristics but potentially less on-site infrastructure. However, the proposed CIL rates for these sites are £185/sqm compared to £380/sqm for North East Ottershaw;
- The proposed rates contained within the DCS are in general excessive when compared with comparable boroughs in the wider area and the proposed rates will have a significant detrimental impact upon viability.

[REDACTED] wishes to ensure that the North East Ottershaw site is deliverable, including necessary supporting infrastructure. The CIL charging schedule consultation is now running ahead of the Local Plan adoption due to the consultation on Main Modifications and the awaited response from the Inspector. This combined with the current unprecedented situation with COVID-19 and effective shutdown of the housing market allows time for the Council to publish further information and consider options for addressing the points raised above.

Should the Local Plan Inspector suggest extension of the plan period and the need for additional sites, it would be necessary to undertake a large site assessment for North East Ottershaw and consider the potential for a zero CIL rating for large sites with significant on site infrastructure requirements, which could also include Longcross Garden Village. Alternatively the Council could amend the boundary between Charging Zones A and C to incorporate the North East Ottershaw Site so that it would have the same CIL rates as similar adjacent sites.

We would also suggest, given the intention set out in the draft SPD that on site infrastructure would continue to be secured through Section 106 obligations, even for those types of infrastructure where it is assumed that for the bulk of sites it will be funded through CIL, that the Council allow for on site provision or land to be provided as payment in kind towards CIL.



██████████ would welcome the opportunity to work collaboratively with Runnymede Borough Council, Surrey County Council and the local community to develop this approach to help ensure that the homes the Borough needs can be provided along with the necessary infrastructure.

We set out further detail of our points below.

2 Guidance on Setting CIL Rates and Viability

The Government publishes guidance on Viability and the Community Infrastructure Levy as part of Planning Practice Guidance (PPG).

Changes made in 2019 to the guidance on Viability emphasise the need to ensure that Local Plans consider the cumulative effects of all standards and obligations including Section 106 and CIL. It states:

Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure).

These policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106. Policy requirements should be clear so that they can be accurately accounted for in the price paid for land. To provide this certainty, affordable housing requirements should be expressed as a single figure rather than a range. Different requirements may be set for different types or location of site or types of development.

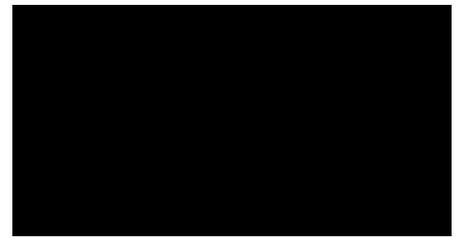
(Paragraph: 001 Reference ID: 10-001-20190509)

The guidance on CIL states that:

“Charging schedules should be consistent with, and support the implementation of, up-to-date relevant plans. (Paragraph: 011 Reference ID: 25-011-20190901)

Runnymede Borough Council does not currently have an ‘up to date relevant plan’ although its Local Plan (2030) is currently being examined. Consistent with the guidance the Council has sought to integrate its infrastructure planning with the plan making process and to test impacts of proposed planning obligations on viability and has undertaken plan level viability testing to support the Local Plan and, using a similar methodology, for CIL. This is welcomed.

It is noted that the Council’s CIL viability assessment tests the sites currently included in the Draft Local Plan but that the Local Plan examination remains open. It is possible that the Inspector’s Report will require further changes to make the plan sound or require an early review to identify additional sites. It is therefore



requested that the Council does not submit its CIL Draft Charging Schedule for examination until this position is clear (i.e. after adoption), as there is a risk that it will not meet the consistency requirement cited above.

3 Viability Evidence: Community Infrastructure Levy Viability Review

The Government also publishes guidance on viability as part of its PPG. This includes the following requirements:

- Any viability assessment should follow the government’s recommended approach to assessing viability as set out in this National Planning Guidance and be proportionate, simple, transparent and publicly available. (Paragraph: 010 Reference ID: 10-010-20180724)

The Guidance on CIL also refers specifically to viability. It states that:

- Viability assessments should be proportionate, simple, transparent and publicly available in accordance with the viability guidance. (Paragraph: 019 Reference ID: 25-019-20190901)
- A charging authority must use ‘appropriate available evidence’ (as defined in the section 211(7A) of the Planning Act 2008) to inform the preparation of their draft charging schedule. (Paragraph: 020 Reference ID: 25-020-20190901)

The Council has published a ‘Viability CIL Viability Testing Final Report’ (November 2019) as the key piece of evidence supporting the revised DCS. This is intended to provide the context for judging the impact of CIL and other obligations on development and in striking the right ‘balance’ to ensure that the delivery of the sites and scale of development in the plan are not put at risk.

We are concerned that at present the CIL Viability Report does not present information in a way that is transparent and accessible as required by national policy and therefore may not provide ‘Appropriate Available Evidence’.

Our experience in responding to Charging Schedules across the country is that for strategic sites they will provide much more granular information on the cost and value assumptions, and their source/basis, including:

- Detailed builds costs and their basis;
- Abnormal costs, including those for complex sites, and in the case of large strategic sites specifically identifying ‘opening up costs’;
- Site specific infrastructure requirements;
- Costs of all relevant policy requirements;

- 
- Finance costs;
 - Professional, project management, sales, marketing and legal costs incorporating organisational overheads associated with the site;
 - Developer and contractor returns.

For larger sites we would also expect to see a cashflow, including duration and costs for planning, site preparation and phases of development, with costs (including financing) attributed to each phase. This would be aligned with income based on market absorption and sales rate and timing of any other income (eg. from Registered Providers for affordable homes).

The approach taken in this study is to present some detail of planning obligations for each site together with screenshots which show total costs but no detailed breakdown and no assessment of timings or phasing of delivery. Appendix 2 gives one worked example with, on page 86, a table of details for inputs to the 30 dph scenario but it is not stated whether this is what has been applied to the large sites, and again doesn't give any information on Phasing.

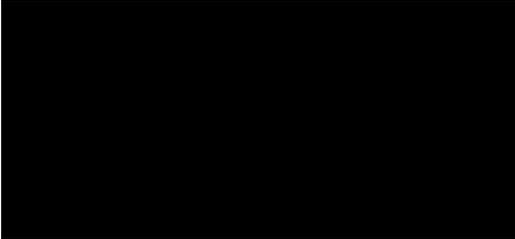
The Viability Study analysis of large sites does not include a site or typology of the size of the North East Ottershaw site (ie 650 to 850 homes) with a gap between 275 homes scheme at Chilsey Green Farm and 1,500 at Longcross Garden Village (c. 1,500 homes). An assessment of Longcross Garden Village is set out at paragraphs 4.77 to 4.82, although it is not included in the summary table at page 45. Again information on this site is provided in a screenshot at page 44, but there is limited background detail. The site has significant planning obligations but these are not broken down by type. There is no information on cashflow, discounted returns or timing of infrastructure requirements.

The report states (para 4.80):

“There has been considerable discussion with developer, Crest Nicholson and their advisers, Turner Morum. All parties are agreed that the scheme is viable, although the Council believes that the scheme is more viable than the applicants' figures suggest.”

It is not possible to comment with any confidence on these conclusions, or indeed for any sites with capacity for over 275 homes because of the lack of information available. We would request that the Council publishes this information and allows respondees to make further comment if necessary as it is material to whether the proposed CIL rates strike the right balance on large sites.

We would add that it would be necessary, should the Local Plan Inspector require additional sites, or an early review to undertake some intermediate typologies (eg. 500, 750 and/or 1,000 homes) based on transparent assumptions and including an understanding of the timing and phasing of infrastructure.



Our, and [REDACTED] experience on large and complex sites elsewhere is that it is often in the interest of both the Charging Authority and the Developer, that zero CIL rates are set which allows for appropriate contributions, including on site infrastructure and affordable housing, to be negotiated and delivered using a Section 106 agreement. The changes to the CIL regulations in 2019, including the removal of pooling restrictions, makes this easier.

Relationship of Viability Study to Proposed Rates

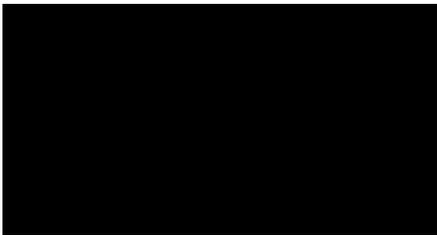
The Viability report, in relation to housing sites, identifies in Section 6 a ‘notional’ surplus for CIL for key sites, and for small sites in sub-areas of the Borough based broadly on postcode areas shown in the map on page 12 of the report. Table 6.4 includes for five parcels of land at Chertsey Bittams a range of a deficit of £2,044 p/sqm to a surplus of £818. Smaller site notional surpluses are higher with exceptionally high surpluses in Virginia Water and Wentworth.

The proposed Charging Zones, shown on Map 1 of the Draft Charging Schedule show a similar broad east/west split as shown in the map on page 12 of the CIL Viability report but differ in some important respects. Firstly the west of the Borough is largely a single charging zone (Zone A) and doesn’t reflect higher values within some parts of the area. Secondly the south of the Borough around Woodham is a reasonably high value area but is a separate zone with a lower charge rate than most of the rest of the Borough including some lower value areas around Addlestone and Chertsey.

Thirdly, and most importantly for the North East Ottershaw site the boundary of Zone C, rightly in our view, extends to encompass all of Chertsey Bittams (with the exception of a small zero rated Zone F) and the St Peters Hospital site (not included in the CIL Viability Study). We assume that this reflects the fact that these locations have values similar to the sites immediately around them and not the more rural parts of the west of the Borough and the fact they are large sites with additional obligations, including for works to the A320/M25 as set out in the draft Infrastructure SPD. As a result they have a proposed CIL rate of £185 per square metre compared to £380 per square metre in the remainder of Zone A, based on smaller sites in higher value areas.

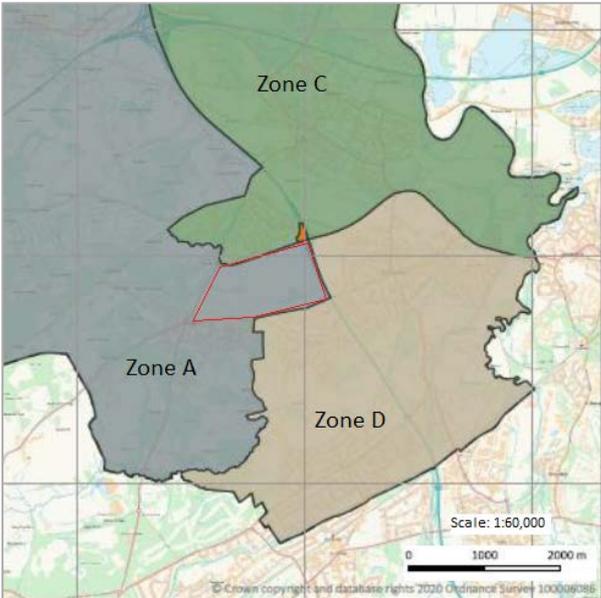
We would regard this as a sensible approach but would suggest that it should also apply to the North East Ottershaw site. The extract From Plan 1, below, shows the boundary of Charging Zones A (£380/sqm), C (£185/sqm) and D (£110/sqm). The location of the North East Ottershaw site is highlighted. The Chertsey Bittams and St Peter’s Hospital sites are immediately to the north. There is no reason to assume that sales values would differ at this location, and assuming a larger development infrastructure costs would be higher. We would therefore suggest that the boundary of Zone C should be moved south to include this area.

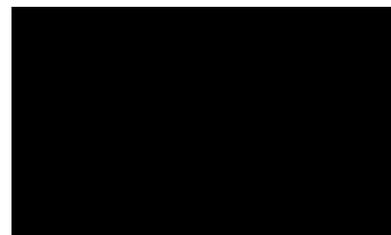
This suggestion is further supported by the map on page 12 of the CIL Viability report (extract below) which highlights the site is evenly split between the Chertsey, Addlestone and Ottershaw Sub-market Areas. With the site aligning more closely with Chertsey and Addlestone Sub-markets which have seen significantly more new build properties sold in the last two full calendar years and which form the majority of the North East Ottershaw site. Planning Practice Guidance on CIL suggests that boundaries for differential rates should be



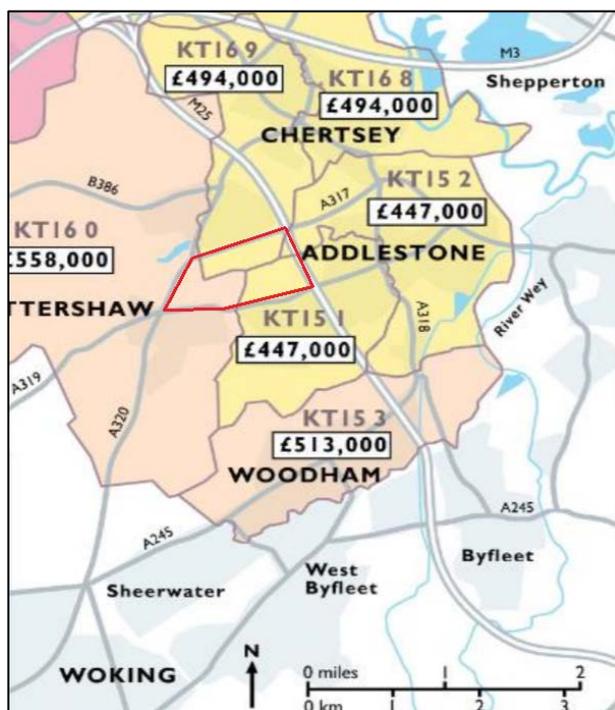
based on fine grained sampling (Paragraph: 020 Reference ID: 25-020-20190901). On this basis the evidence suggests that the North East Ottershaw site should be in Zone C or D.

Extract from Plan 1: CIL Charging Zones





Extract from Viability Report: Broad Sub-market Areas

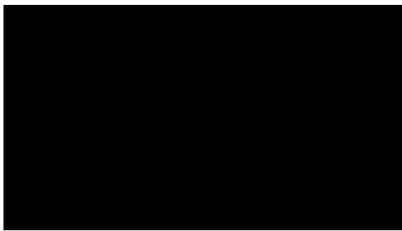


When comparing the proposed £380/sqm rate against peer authorities we can see it is also significantly higher. Table 1 highlights that of Elmbridge, Spelthorne, Surrey Heath and Woking the highest residential chargeable rate is £220/sqm, £160/sqm less. This difference is even more significant when considering Runnymede’s Average Sales Value in January 2020 (£412,742), which is only slightly higher than Surrey Heath (£387,654) and Spelthorne (£368,126), is less than Woking (£424,388) and is significantly less than Elmbridge (£588,488). Again this suggests that the rates in Zones C and D are more appropriate rather than the £380/sqm in Zone A.

Table 1: Average Sales Value and Residential CIL Rates in Surrey Authorities Bordering Runnymede

	Average Sales Value (January 2020)	Residential CIL Rate	
		Lowest	Highest
Elmbridge Borough Council	£588,488	£125	
Spelthorne Borough Council (schemes of 15 or more units)	£368,126	£0	£60
Surrey Heath Borough Council	£387,654	£55	£220
Woking Borough Council	£424,388	£75	£125

Sources: HM Land Registry Average Sales Value (January 2020); Elmbridge, Spelthorne, Surrey Heath and Woking Borough Council’s Charging Schedules.



4 Relationship with the Draft Infrastructure Delivery & Prioritisation SPD

We are pleased that the Council has published its draft SPD alongside the CIL Draft Charging Schedule as it allows landowners and developers to understand the likely combined obligations and comment on their potential impacts on viability.

St Edward's response to that consultation is appended to this letter but there is one specific issue which is directly relevant to CIL. For several obligations the Council suggests that, when CIL is introduced, if these are off site requirements they will be paid for through CIL. These include early years and education contributions, health and community facilities, playspace, outdoor space and allotments. Where these are provided on-site they will continue to be secured through Section 106 obligations.

For larger sites which provide infrastructure on-site there is therefore the potential for 'double dipping' in that they will have to provide such things on site but also pay CIL. This could have major impacts on viability. In these circumstances we would suggest that the Council should allow for 'Payments in Kind' (Land Payments) and 'Infrastructure Payments' to be counted towards CIL payments. This is allowed for under regulations 73, 73a, 73b and 74 of the CIL regulations. The regulations require a number of tests to be met, one of which is that the Council must adopt a policy allowing for them. Off-site infrastructure which is directly related to the development could also be funded through a Section 106 agreement, or treated as a payment in kind.

This is not an issue that is tested at the Examination of the Charging Schedule but our experience elsewhere has been that it has been helpful for examiners to understand how the Council will deal with circumstances where development viability might be put at risk by on site requirements combined with CIL.

5 Summary and Conclusions

St. Edward welcomes the opportunity to respond to Runnymede's consultation on its CIL DCS. It recognises the importance of the need to deliver infrastructure alongside new homes and wishes to work with the Council to ensure that the Ottershaw site can help contribute to the Council's targets and support placemaking in the Local Area.

The delay in the Local Plan process, combined with wider unprecedented market uncertainty offers the opportunity for Runnymede Borough Council to give further consideration to the proposed approach and ensure that the introduction of CIL does not undermine the delivery of development in the Borough.

This should include provision of more detail on the background assumptions for larger sites contained in the Viability Report, and further assessment of larger sites of above 500 homes. We would request that the Council consider either setting a zero rate for such sites or moving the North East Ottershaw site into Zone C in the charging schedule. We would also encourage the Council to consider allowing for payments in kind and infrastructure payments if and when it adopts its Charging Schedule.

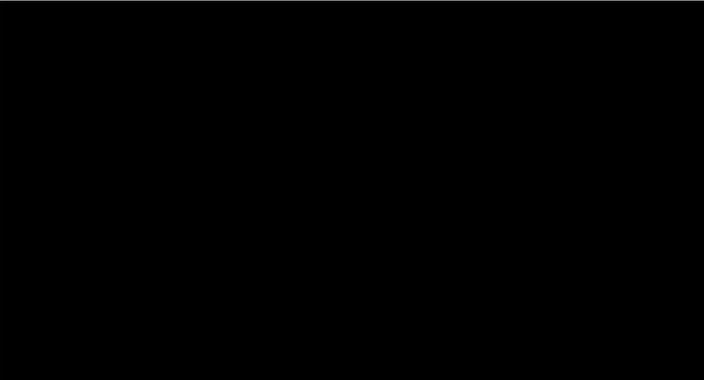


The current proposed CIL rate of £380/sqm in charging Zone A of the DCS would have a significant negative impact upon future development sites coming forward, rendering them unviable. This charging rate would broadly result in an overall payment that is two to three times larger than the total obligations under the current adopted planning obligations SPD which alongside the significant infrastructure costs would prevent this site and similar sites delivering much needed new housing. When comparing adopted CIL charging schedules in nearby boroughs, it is clear that the rates contained in the DCS are excessively high and should be revised down.

We would be happy to discuss any of these issues further and if you require further information please do not hesitate to contact me.

We would also like to confirm St. Edward would like to reserve the right to be heard at examination.

Yours sincerely,

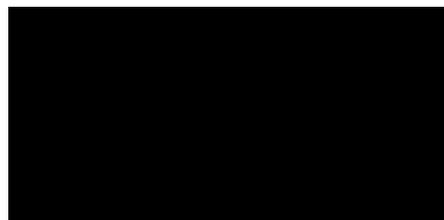


appended
- Infrastructure Delivery & Prioritisation Supplementary Planning Document Reps

Our ref: Q200189

Your ref:

Date: 6th April 2020



The Planning Policy & Economic Development Team
Runnymede Borough Council
Runnymede Civic Centre
Station Road
Addlestone
KT15 2AH

By email

Dear Sir/Madam,

Infrastructure Delivery & Prioritisation Supplementary Planning Document (SPD)

1 Introduction

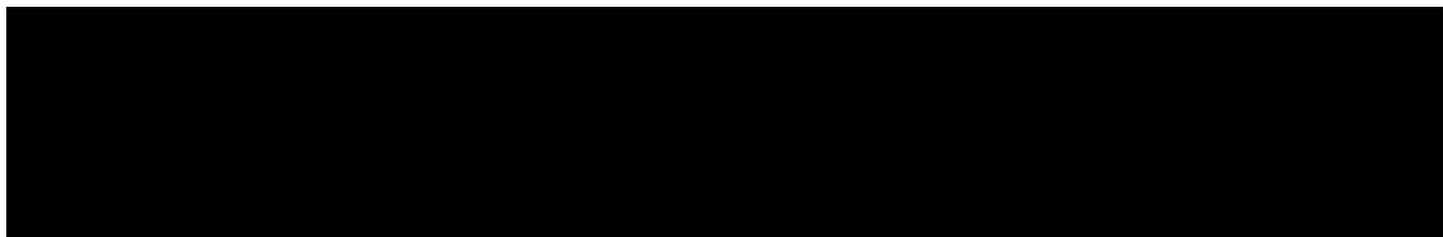
I am writing on behalf of [REDACTED] to make representations in relation to the Consultation on your Infrastructure Delivery & Prioritisation Supplementary Planning Document ('IDP SPD').

[REDACTED], the joint venture between [REDACTED] Investments and the [REDACTED], has an interest in a site in North East Ottershaw. A plan showing the location of the site is appended. This site is located adjacent to Junction 11 of the M25 south of St Peters Way. [REDACTED] has made representations to the current Local Plan Examination that the Plan period should be extended to 2035 and that additional sites should be allocated, including this site, to make the Plan sound. Should this not happen [REDACTED] has suggested an immediate plan review will be necessary to address the area's need for homes over an appropriate period as required by Government policy.

The Council is also consulting on its Draft Community Infrastructure Levy Charging Schedule. We have submitted representations to this document on behalf of [REDACTED], which we append to this letter. The two sets of representations should be read together.

In summary the conclusions are:

- [REDACTED] welcomes the Council's approach of developing its CIL Charging Schedule and IDPSPD in parallel with Local Plan development based on evidence from its Infrastructure Delivery Plan. This follows good practice and, in principle, allows the deliverability of sites to be properly considered;





- [REDACTED] supports the approach to identifying priority categories in Section 2 and the clarity provided in Table 2-3 on what will be dealt with through Planning Obligations and what will be funded via CIL contributions, after CIL is implemented. This provides a sensible categorisation subject to detailed comments below;
- [REDACTED] broadly supports the approach to Implementation set out in Section 3, including early engagement, recognition of the need for obligations to meet the tests set out in Regulation 122 of the CIL regulations, and the proportionate approach including not seeking obligations from affordable dwellings (other than SANG) set out in para 3.24. They acknowledge the need for proportionate contributions to monitoring of obligations although believe that these should be capped for larger schemes;
- [REDACTED] regards the costs set out in the Infrastructure Cost calculations as broadly reasonable subject to a) their detailed implementation being based on actual scheme impacts and being Regulation 122 compliant, b) for the 'non-critical' items that they are paid for from CIL and not additional to it; and c) that credit is allowed for on site and direct provision both against any S106 formulae and also as infrastructure payments or payments in kind towards CIL where relevant and the tests set in the regulations are met,

[REDACTED] would welcome the opportunity to work collaboratively with Runnymede Borough Council, Surrey County Council and the local community to develop this approach to help ensure that the homes the Borough needs can be provided along with the necessary infrastructure.

We set out further detail of our points below.

2 Specific Comments

Section 1: Purpose of the SPD

[REDACTED] welcomes the publication of the draft SPD and the Council's broad approach to infrastructure delivery. We note that the draft refers to the Runnymede Local Plan 2030 as if it were adopted. We assume that this is because it is in draft and will only be adopted as policy as and when the Plan is adopted.

We note that several respondents to the Consultation on Modifications, including St Edward, have suggested that significant changes to the Plan are required for it to be 'sound'. Were this to be the conclusion of the Inspector the SPD would need to be updated to reflect any changes including in relation to infrastructure requirements and the Spatial Distribution of Development.



Section 2: Infrastructure Hierarchy and Prioritisation

██████████ supports the categorisation of infrastructure set out in Tables 2-1 and 2-2 as sensible. Subject to our detailed comments below St Edward regards the pre- and post CIL approach to obligations as reasonable. In particular the clarity that any off-site contributions to Education, Health, Flood Defence, Green Infrastructure, Community Facilities and Bio-Diversity and Emergency services will be funded through CIL when that is implemented is welcome.

██████████ recognises the need for Section 106 obligations and/or planning conditions, and for transport improvements Section 278 agreements, to be used to secure on site provision and direct works. St Edward supports the suggestion that for transport investment this may be accepted in lieu of other requirements. The same principle also applies to direct SANG provision (ie off site contributions are not required).

██████████ is however concerned that if it provides facilities on site – for example playing fields, play space or a community building, there is currently no mechanism proposed for that to be credited against CIL payments. It is possible for the Council to allow for ‘Payments in Kind’ (Land Payments) and ‘Infrastructure Payments’ to be counted towards CIL payments. This is allowed for under regulations 73, 73a, 73b and 74 of the CIL regulations. The regulations require a number of tests to be met, one of which is that the Council must adopt a policy allowing for them. It would be useful if the SPD could confirm that the Council will adopt this approach.

Section 3: Approach to Section 106 Financial Contributions

██████████ broadly supports the approach to Implementation set out in Section 3.

██████████ welcomes the Council’s confirmation in paragraph 3.4 that:

“the cost impact calculations are not tariffs to be applied rigidly but are an aid to the Council as a starting point for negotiation.”

This is consistent with Regulation 122 of the CIL Regulations and caselaw. However we are concerned that the suggestion that ‘Critical Infrastructure’ items are an exception to this. This may, in some circumstances, not be consistent with the Supreme Court Judgement (Aberdeen City and Shire Strategic Development Planning Authority (Appellant) v Elsick Development Company Limited (Respondent) (Scotland) [2017] UKSC 66. In relation to transport contributions they will need to meet the Regulation 122 tests and in particular be directly related to the impact of the development.

Paragraph 3.6 states that “The Borough Council considers its cost calculations to be viable given the evidence of viability for the Local Plan and CIL.” St Edward has commented on the CIL Charging Schedule and the Viability Assessment related to that and has requested further information to consider whether that is the case. At present it is of the view that the cumulative effect of the ‘Critical’ items in the SPD when combined with the proposed CIL rates for Charging Zone A would not be viable for the North East Ottershaw site.



██████ recognises the need for early engagement as set out in paragraph 3.9. It accepts that contributions to monitoring may be requested provided they are proportionate and reasonable. However St Edward disagrees that a standard 5% charge meets these tests, and that such a charge should be accompanied by a cap. In principle there is no reason why any greater resource is required to monitor (say) a SANG contribution of £500,000 than £50,000. In effect larger developments will pay monitoring fees disproportionate to the effort required to monitor their obligations. We would suggest a maximum cap of £10,000 per Section 106 agreement should be set.

In paragraph 3.25 the uncertainty over costs for Outline Planning Applications is noted. One alternative to constantly varying S106 agreements or requiring a series of unilateral undertakings would be for a reconciliation report, against fixed cost multipliers be submitted at each RMA stage with appropriate payment triggers.

Infrastructure Cost Calculations

A320 Corridor & M25 Junction 11 Improvements

As noted above St Edward is of the view that contributions should be related directly to the impact of the proposed development. St Edward supports the suggestion that:

“On occasions developers of A320 contingent sites may wish to bring forward improvements on the A320 corridor including direct physical improvements through Section 106 and Section 278 agreements with Surrey County Council rather than pay a financial contribution in lieu of physical provision. Where this is the case, this will need to be negotiated with and to the satisfaction of Surrey County Council as the Highways Authority.”

The North East Ottershaw site offers the opportunity to provide land and funding to unlock the improvement of the A320 Ottershaw roundabout, and associated highways improvements which we would suggest should qualify.

The development of the North East Ottershaw site and the funding of the roundabout improvement would make the HIF funding go further and enable it to unlock further housing delivery.

Thames Basin Heaths Special Protection Area

The North East Ottershaw site offers the opportunity Strategic country park SANG providing capacity to unlock other development in the area by addressing the shortfall of SANG in the borough.

Other Local Highway, Active & Sustainable Travel & Education

We note that the ‘IDPSPD’ cross refers to the Surrey County Council Developer Contribution Guide (2018). The requirements within that Guide appear to be broadly reasonable but it will be important that the



Borough Council and County Council do not seek to extend further the obligations outside of the Local Plan process or proper Viability assessment which would have the potential to put development at risk.

Primary Healthcare Facilities

█ notes that Primary Healthcare Facilities, funded in lieu via CIL may be an appropriate contribution. However it is not necessarily the case, as suggested at Table 3-6, that the need for health facilities is related to current list sizes. In many cases physical facilities will have the capacity to house additional GPs, the constraint is Government funding which should be provided through general taxation. CIL and or S106 obligations should not be funding core public service revenue costs.

Built Community Facilities, Children’s Playspace and Outdoor Sports and Allotments

█ supports the need for such provision and, where appropriate, will provide that on site. If CIL has been introduced there is a risk that a developer would also be contributing to off site provision. In this circumstance the Council should consider in kind contributions towards CIL as suggested above.

3 Summary and Conclusions

█ welcomes the opportunity to respond to Runnymede’s consultation on its Infrastructure Delivery & Prioritisation Supplementary Planning Document. It recognises the importance of the need to deliver infrastructure alongside new homes and wishes to work with the Council to ensure that the Ottershaw site can help contribute to the Council’s targets and support placemaking in the local area.

We would be happy to discuss any of these issues further and If you require further information please do not hesitate to contact me.

Yours sincerely

