

Runnymede 2030

Local Plan

Runnymede Housing Delivery Test Action Plan 2023

October 2024



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1. Introduction

Why Housing Delivery is important

- 1.1 There is wide publicity over the national housing crisis which is being experienced in England. The lack of supply and pressure for new homes is felt most acutely in the South East of England. The Government is focused on increasing the supply of new homes across the country, having announced in October 2023 (and re-iterating this commitment after the July 2024 election) that the government is seeking a further 1.5 million homes to be delivered in the next five years.
- 1.2 The Housing Delivery Test¹ 2022 result for Runnymede Borough Council was published by the Secretary of State on 19 December 2023. Runnymede Borough Council scored 87%. This compares with a figure of 123% in 2019, 135% in 2020 and 109% in 2021. Because the Housing Delivery Test result for Runnymede Borough Council was below the 95% required by the Housing Delivery Test measurement rulebook², the Council is required to produce a Housing Delivery Action Plan to positively respond to the challenge of increasing its housing delivery. The Action Plan analyses the reasons for the under-delivery of new homes and sets out actions to improve housing delivery within the Borough.
- 1.3 One key finding arising from the development of this Action Plan (AP), however, is that the Council is generally meeting the targets set for it by Government, particularly in relation to the determination of planning applications, both in relation to speed and quality of decisions. This is achieved primarily through the hard work of officers, but also the frequent review of processes (e.g. the review of conditions) and regular officer and Elected Member training. It is also considered relevant that the Council has an up-to-date Local Plan which allocates numerous sites for development across the Borough. As a result, the delivery (or lack thereof) in the Borough is largely due to issues outside of the Council's control. These issues will be explored in this Action Plan in the following sections.

¹ <https://www.gov.uk/government/collections/housing-delivery-test>

² <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book>

2. The Action Plan Context

Aims of this Action Plan

- 2.1 This Action Plan is the Council's response to the challenge set out in the National Planning Policy Framework to boost significantly the supply of homes. In line with supporting guidance contained in the Planning Practice Guidance (PPG), this document seeks to:
- Examine the possible reasons for 'under delivery' of new homes in the Borough;
 - Explore ways to reduce the risk of further under-delivery; and
 - Set out what actions the Council can take to increase the rate and number of homes built in Runnymede.
- 2.2 The Action Plan is not a decision-making document but seeks to identify opportunities to improve housing provision.
- 2.3 Building houses can be a complex process. Often there are factors beyond the Council's control which explain why sites approved/allocated for housing do not come forward for development. It requires a broader approach to be taken to increase the delivery of new homes and the use of other tools available which are beyond the traditional remit of the Local Planning Authority. This will be explored in more detail in this document.

Current Planning performance in Runnymede

Planning Decision Making Performance

- 2.4 Runnymede Borough Council is customer focused and seeks to negotiate with developers and homeowners to deliver positive planning outcomes and to satisfy the aspirations of national and local policies. In terms of the speed and quality of decisions made, the performance for the Local Planning Authorities (LPAs) is measured based on the percentage of planning applications they determine within eight weeks for minor and householder planning applications or 13 weeks for major applications (or within an extension of time agreed with the applicant). For several years the targets have been as follows:
- Majors – 60% determined within 13 weeks
 - Minors – 65% determined within 8 weeks
 - Others – 80% determined within 8 weeks

Major development is defined as: more than 10 residential units, dwellings on a site with an area of 0.5 hectares or more, 1,000sqm or more of new commercial floor space or sites with an area of more than 1 hectare.

Minor development is defined as: up to 9 residential units, up to 999sqm of new floor space, changes of use.

Others: mainly householder schemes.

- 2.5 In the last five monitoring years (2019/20 to 2023/24, running from 1st April – 31st March each year) – Runnymede exceeded all the performance targets set for each category of development as shown in the Table below.

Table 1: Development Management Performance (1st April 2019 – 31st March 2020 to 1st April 2023 – 31st March 2024)

Year	Majors				Minors				Others			
	Total	On target	% on target	Gov. target	Total	On target	% on target	Gov. target	Total	On target	% on target	Gov. target
2019/2020	15	14	93	60%	226	196	86	65%	577	535	92	80%
2020/2021	18	16	89	60%	231	218	94.5	65%	528	492	93	80%
2021/2022	16	14	87.5	60%	172	155	90	65%	679	625	92	80%
2022/2023	22	21	95	60%	191	174	91	65%	611	553	90	80%
2023/2024	27	27	100	60%	178	155	87	65%	404	346	85	80%

- 2.6 The data above shows that the number of major applications has increased notably since 2019/2020, going from 15 in 2019/20 up to 27 in 2023/24, with the percentage of these being on target always being close to, if not over 90%, with the data for this year showing that 100% of these applications were determined on time, despite the number of them almost doubling since 2019/2020. This demonstrates Runnymede’s commitment to making decisions on major applications on time, to ensure that significant numbers of new homes can come forward as soon as possible.
- 2.7 Whilst the number of minor applications has generally declined over the five-year period assessed, the decision-making on these applications remains (in the vast majority of cases) timely, with the number of them being determined on time always at least 20% higher than the Government target of 65%. Again, this demonstrates the Council’s commitment to making timely decisions that do not hinder development.
- 2.8 For ‘Other’ applications, whilst the numbers have fluctuated over the last five years, the Council has always maintained its record of being ahead of the Government’s targets for determining such applications in a timely fashion.
- 2.9 Overall, from a review of the national statistics published by the Government, it is clear that the Council’s decision making exceeds the targets set by Government for every category of application type, and this consistency has been maintained over multiple years. This is despite the number of major applications nearly doubling since the adoption of the Runnymede 2030 Local Plan in 2020. This increase in the number of major applications would be expected as the larger allocated sites start to come through the ‘planning pipeline’. Evidence of these larger allocations coming forward is demonstrated in table 4 below.
- 2.10 As well as looking at the speed of decision taking, the Government also assesses performance against the following quality criteria:
- The **quality** of decisions made by the authority on applications for **major** development.

- The **quality** of decisions made by the authority on applications for **non-major** development.

2.11 With just a few exceptions, non-major equates to a combination of the ‘minor’ and ‘other’ categories referred to above.

2.12 The quality measurement relates to the number of appeals allowed as a percentage of the total number of applications received in the category. The threshold for quality on both categories is **10%** and the **lower** the figure, the better the performance.

2.13 On those sites where planning permission was refused, the appeal performance is good. The Council’s performance against the Government’s targets is set out in the table below:

Table 2: Runnymede’s performance against Government quality targets

Measure and type of Application	Threshold and assessment period	Runnymede’s Performance
Quality of major development*	10% (24 months to the end of March 2023)	0%** (24 months to the end of March 2023)
Quality of non-major development*	10% (24 months to the end of March 2023)	0.7%** (24 months to the end of March 2023)

Please note that these figures³ were the most recent available at the time they were taken from the Government’s website on 18 April 2024.

2.14 These statistics demonstrate the soundness of decision taking by the Council’s Development Management (DM) team and that unsound decisions are not being made which would lead to unnecessary delays to the delivery of new homes. Runnymede is approving the acceptable applications that it receives and is avoiding planning by appeal.

Extensions of time

2.15 Although Runnymede Borough Council meets the Government’s statutory metrics for determining planning applications, it should be noted that there is usage of extensions of time in the borough. Over the period of 2019 – 2023 (calendar years) the number and percentage of applications determined compared to the number of applications given an extension of time has remained relatively consistent⁴. This is set out in table 3 below:

³ <https://www.gov.uk/government/statistical-data-sets/live-tables-on-planning-application-statistics#planning-performance-tables>

⁴ <https://www.gov.uk/government/statistical-data-sets/live-tables-on-planning-application-statistics#planning-performance-tables> – see District Planning Application Statistics (PS1)

Table 3: Extensions of time granted by year

Year	No. of applications determined	No. of applications given an extension of time	Percentage
2019	829	371	45
2020	748	291	39
2021	868	375	43
2022	823	311	38
2023	651	303	47

- 2.16 Runnymede uses extensions of time in order to negotiate on and improve schemes that would otherwise be refused. As can be seen from the above, the percentage has remained consistently between 38-47% over the period analysed. It should, however, be noted that some of these applications that are determined in any given quarter will have been received prior to the start of said quarter, and thus the granting of extensions of time will not align perfectly with these applications. It does, however, give a good indication of the ratio of applications being determined to those being granted extensions of time. The data shows that year on year, there is a significant proportion of planning applications that are not determined within the 'statutory' deadlines of eight and 13 weeks.
- 2.17 The use of extension of times, however, is permitted by the Government, and their use does not compromise the ability of Local Authorities to meet the performance targets of the Government related to speed of decision taking as described above. The use of extensions of time allows additional time for amendments to be made to schemes during the application process. This not only significantly improves the quality of development coming forward, but also allows the Council to approve a much greater number of planning applications, preventing delays being introduced through the appeal process or through an applicant needing to submit a revised planning application. Both scenarios the alternative scenarios are considered likely, in the majority of cases, to delay the provision of new homes more than allowing extensions of time and as such the negotiation on schemes is considered the best way forward.

Progress on allocated sites in the Runnymede 2030 Local Plan

- 2.18 The table below sets out the progress in delivering the allocated sites in the Runnymede 2030 Local Plan against the indicative timescales set out for delivery in the Local Plan. The indicative timeframes within the local plan were, in most cases, informed by discussions with landowners/promoters at the time. The number of allocated sites starting to / having come through the planning application system in Runnymede in recent years matches the increased number of major applications being determined by the Council (the vast majority on time), as set out in the section above relating to the Council's performance against Central Government's targets for decision taking.

2.19 In the table below, it should be noted that ‘proposed’ refers to when the Council has received a planning application, but this application remained undetermined at the point of producing the Action Plan, so the units have been proposed for development, but not yet permitted. An outline / reserved matters / full planning permission / a resolution to grant planning permission is referred to as ‘permitted’.

Table 4: Progress in delivering sites allocated in the Runnymede 2030 Local Plan

Site name	No. of dwellings (allocated / proposed / permitted)	Date due to come forward in the adopted Runnymede 2030 Local Plan	Progress to date	Notes	On track with Local Plan allocation (Y/N)?
Land at Brox End Nursery, Ottershaw (Policy SL2)	40 allocated 45 permitted 0 completed	2019-2021	Planning permission granted under RU.20/0675 on 24/02/2024 and under construction.	Expected to be delivered in 2025/26 and 2026/27.	No
Hanworth Lane, Chertsey (Policy SL3)	210 allocated 206 permitted 158 completed	2017-2025	Has full or reserved matters planning permission under RU.23/0557, RU.18/1280 and RU.16/1198.	Allocation split into three but progressing well	Yes
Coombelands Lane (SL4)	40 allocated 43 permitted 43 completed	2018-2021	Site completed in 2022.	None	No
Blays House, Blays Lane, Englefield Green (Policy SL5)	100 allocated 8 permitted 0 completed	2022-2027	Planning permission was granted for eight flats under RU.21/2188 but no progress has been made on implementing this.	This site is currently available but there is no certainty about when it may come forward.	No
Pycroft Road, Chertsey (Policy SL6)	275 allocated 228 permitted 11 completed	2023-2028	Has planning permission granted for 228 units under RU.22/1569 (69 units) and RU.21/0893 (170 units).	38 further units, pending under RU.23/1508.	Yes, based on council monitoring data as it is now delivering units.

Site name	No. of dwellings (allocated / proposed / permitted)	Date due to come forward in the adopted Runnymede 2030 Local Plan	Progress to date	Notes	On track with Local Plan allocation (Y/N)?
Thorpe Lea Road North (Policy SL7)	90 allocated 49 proposed 52 permitted 0 completed	2021-2030	RU.23/1162 granted permission on 10/05/2024 for 52 units. RU.23/0698 for 49 units currently pending determination.		Potentially, as this site has a long timeframe.
Thorpe Lea Road West (Policy SL8)	250 allocated 75 permitted 0 completed	2019-2024	Resolution to grant outline planning permission for 75 units under RU.21/1324		No
Virginia Water North (Policy SL9)	120 allocated 12 proposed 0 permitted 0 completed	2020-2025	One pending application for up to 12 units under RU.23/1836.	The rest of the site is coming forward slowly.	No
Virginia Water South (Policy SL10)	140 allocated 67 permitted 0 completed	2020-2023	67 units have outline permission under RU.22/0278 with reserved matters pending under RU.23/1061.	The other half of the site is coming forward more slowly.	No
Central Veterinary Laboratory - Parcel B (Policy SL11)	150 allocated 0 proposed 0 completed	2023-2026	None.	This site is currently stalled and there is no certainty about when it may come forward.	No
Ottershaw East (Policy SL12)	200 allocated 201 permitted 0 completed	2023-2027	Two granted permissions under RU.22/0454 and RU.23/0544 expected to come forward in the next five years.	RU.22/0454 (184 units) RU.23/0544 (17 units).	No, though site is now making progress.
St Peter's Hospital,	400 allocated 408 permitted	2020-2025	Implemented planning permission under	250 units remaining to be built.	No, though site is now making

Site name	No. of dwellings (allocated / proposed / permitted)	Date due to come forward in the adopted Runnymede 2030 Local Plan	Progress to date	Notes	On track with Local Plan allocation (Y/N)?
Chertsey (Policy SL13)	158 completed		RU.17/1815		progress.
Chertsey Bittams A (Policy SL14)	175 allocated 149 permitted 0 completed	2023-2026	Planning permission granted under RU.21/0272 for 149 units.	Lesser number of units permitted than the site was allocated for. One small part of allocation remains unconsented	No
Chertsey Bittams B (Policy SL15)	120 allocated 0 proposed 0 permitted 0 completed	2023-2026		Agent for the site states it may be developed between 2028-2029 and 2030-31.	No
Chertsey Bittams C (Policy SL16)	9 allocated 0 permitted 0 completed	Post 2027	Resolution to grant for 11 allocated Gypsy and Traveller pitches under RU.23/0338.	Unlikely that nine dwellings will come forward as site area reduced by AQMA.	Yes (G and T pitches) and no (dwellings)
Chertsey Bittams D (Policy SL17)	125 allocated 172 permitted 0 completed	2021-2025	Outline consent under RU.17/1749 for 175 units. Reserved matters application (RU.23/0607) for 172 units granted on 12/08/2024.		No
Chertsey Bittams E (Policy SL18)	75 allocated 5 permitted 0 completed	2023-2026		A small part of this site has full planning permission for 5 net units under RU.21/1766.	No

Site name	No. of dwellings (allocated / proposed / permitted)	Date due to come forward in the adopted Runnymede 2030 Local Plan	Progress to date	Notes	On track with Local Plan allocation (Y/N)?
Longcross Garden Village (Policy SD9)	1,700 allocated 1,700 proposed 186 completed	First Phase of Development on south site to commence by 2020/2021	1,700 homes under RU.22/0393 granted outline planning permission (subject to the signing of a s.106) at Longcross South.	There is a long build-out timeframe for this large development. The 186 permitted and completed units have been built at Longcross North.	No
Addlestone East (Policy IE7)	70 allocated 75 permitted 0 completed	2020-2023	Extant consent under RU.18/0743.	New application for 75 units pending under RU.22/1373.	No
Addlestone West (Policy IE8)	70 allocated 0 permitted 0 completed	2022-2024	None.	This site now appears unlikely to come forward in its current form. A much smaller area may come forward separately.	No
Egham Gateway East (Policy IE9)	45 allocated 0 permitted 0 completed	2022-2024	None.	Council's Assets and Regeneration team have suggested 30 units may be more suitable.	No
Egham Gateway West (Policy IE10)	60-120 allocated 99 permitted 99 completed	2020-2022	Site completed in 2022.	Also included 100 units of student accommodation (equivalent to 32 dwellings) which are in addition to the 99 C3 units.	Yes
Strodes	100 allocated	2021-2023	Site completed in 2022.	107 units of student	Yes

Site name	No. of dwellings (allocated / proposed / permitted)	Date due to come forward in the adopted Runnymede 2030 Local Plan	Progress to date	Notes	On track with Local Plan allocation (Y/N)?
College Lane Allocation (Policy IE11)	107 completed			accommodation provided equivalent to 35 dwellings.	
Chertsey Opportunity Area: Sainsburys and car park (Policy IE12)	34-128 allocated 0 permitted 0 completed	Post 2027	None		No.
High Street North Opportunity Area, Egham (Policy IE12)	50 allocated 0 permitted 0 completed	Post 2025	None		No
Egham Library opportunity area (Policy IE12)	40 allocated 0 permitted 0 completed	Post 2025	None	This site appears unlikely to come forward in its current form. A much smaller area may come forward separately.	No

2.20 Although there has been some delay in a number of the allocated sites coming forward, compared to what was originally expected in terms anticipated delivery timeframes as stipulated in the Local Plan, many of these sites are now making good progress through the planning and development process and the majority of allocated sites have planning permission. This, when coupled with the Council's excellent performance against the Government's targets for determining major applications over the last five years (with 100% of the 27 major applications the Council received in the 2023/24 monitoring year being determined on time), shows that it is not the Council's decision-making that is causing delays to the delivery of new homes on these sites.

2.21 The reasons for the delay in housing delivery are both manifold and outside of the Council's control, including changes in

developer intentions towards the sites they own / control, challenges which present themselves during negotiations between landowners and developers, fractured land ownership, the lingering and longer-term impact of the Covid-19 pandemic and its knock-on effect on the slowdown of housing delivery, and increased construction costs, which particularly spiked after the Russian invasion of Ukraine.

Implementation of Planning Permissions

- 2.22 Once planning permissions have been granted, councils have limited influence over when permissions are actually implemented. Under planning legislation, permission is generally required to start within three years from the date of the decision notice, though Councils can issue permissions for shorter or longer time lengths. From reviewing the Council's monitoring data, implementation of planning consents generally occurs within the permission period, especially on major sites (i.e. the lapse rate in Runnymede is low).
- 2.23 However, there are some instances where developers undertake the first stages of implementing a planning permission by carrying out the demolition of buildings on site and then delay the construction of the development. This happened, for example, at the Addlestone East site, which was allocated for development under Policy IE7 of the adopted Runnymede 2030 Local Plan. Planning consent was granted for the demolition of the buildings on the site on 25 May 2018 (under RU.18/0744), with a subsequent planning permission for development granted under RU.18/0743 on 4 December 2018. An amended scheme under RU.22/1373 has since received a resolution to grant planning permission, although the signing of the legal agreement is awaited. This shows that since demolition, this site has remained undeveloped for a period of 6 years.

Signing of Section 106 agreements

- 2.24 Having reviewed the s.106 agreements that were completed between June 2022 and March 2024, the average length of time for an agreement to be finalised (and thus the planning consent granted) following the resolution to grant planning permission was in the region of 151 days (circa five months). There were a wide variety of time lengths between the various agreements being signed off, with the lowest being -126 days (e.g. the legal agreement was completed circa 4.2 months prior to the grant of planning permission), with the longest 1,453 days (slightly less than four years).
- 2.25 One of the key reasons for delays in the completion of legal agreements relates to changes to the Affordable Housing regime, which has placed significant additional burdens on Local Planning Authorities in recent years. For example, the implementation of the Government's First Homes policy, the impact of the Homes England grant funding regime in relation to additionality, and a lack of capacity in the Registered Providers that the Council works with, has slowed down the completion of many legal agreements.

- 2.26 Another reason for the delays to the signing of legal agreements is due to other factors including lengthy negotiations with developers over complex infrastructure issues that certain agreements have needed to encompass (e.g. the provision of on-site infrastructure such as community and healthcare facilities etc.). In addition to this, ecological matters (for example, relating to the introduction of the Biodiversity Net Gain requirements) apply to a far greater number of planning applications than was the case historically. This results in more legal agreements being required, thus taking more time for the Council's Legal Team to be able to process.
- 2.27 There is finite capacity within the Council's Legal Team to process an increasing number of legal agreements alongside other legal work which needs to be progressed for other departments in the Council. This has resulted in it taking longer to sign off some legal agreements. This issue, has however, begun to be rectified by the Council utilising capacity from the private sector (which started in 2023) which has, and will continue to assist with the timely processing of legal agreements.

3. Action Plan

3.1 This section sets out:

- Some of the key challenges facing Runnymede and other local authorities across the country;
- The actions that the Council has already taken to increase housing delivery;
- Potential ways to reduce the risk of further under-delivery; and,
- Further actions the Council can take to increase the rate and number of homes built in Runnymede.

3.2 The Council is fully committed to working proactively with local communities and the development industry to deliver the homes that Runnymede needs, including a range of housing types and tenures. It must be recognised however that delivering new homes in a timely manner is dependent on the actions of a range of stakeholders, and not just the Local Planning Authority.

Key challenges facing Runnymede and other local authorities

3.3 In common with many other local authorities in the South East, Runnymede has a growing demand for genuinely affordable housing and is facing a number of key challenges. These include:

- Increasing numbers of households on the Housing Register
- Lack of availability of existing affordable housing
- High rates of statutory homelessness
- High use of emergency and temporary housing for homeless households
- Increasing affordability issues
- Lack of new-build affordable housing
- A need for and lack of key worker accommodation

3.4 Alongside the above housing-specific issues, there are a number of issues affecting the Council's Planning Service which have been identified as having an impact upon the delivery of the service, and thus are having an impact upon delivery of new homes.

A lack of clear Government Policy around the implementation of new policies / approaches.

3.5 The level of complexity involved for new initiatives, such as the mandatory requirement for Biodiversity Net Gain (BNG) would benefit from the production of much clearer guidance about its implementation, as this would help greatly in its smooth implementation. The lack of guidance around BNG and the impact that this is having on local authorities is evidenced by a recent RTPi survey which has found that 81% of planners in the public sector have said that they need more guidance, advice and support on BNG⁵. The provision of clear guidance around implementation would ensure that it does not have a knock-on effect for the delivery of homes, for example,

⁵ <https://www.rtpi.org.uk/news/2024/february/rtpi-finds-81-of-public-sector-planners-need-more-guidance-on-bng-as-law-comes-into-effect/>

by delaying the production of legal agreements.

Responsiveness of statutory consultees

- 3.6 Another area that would ensure that decisions on proposed housing developments can be made faster is better quality and quicker responses from statutory, and other consultees. Currently a number of statutory consultees can often take a significant length of time to provide comments on development proposals (particularly larger sites), which can often hold up decision taking as the case officer needs the feedback from that consultee to be able to make a decision. This may require additional resourcing and funding by the Government in some cases.

Resourcing within planning departments

- 3.7 A persistent lack of resource in Local Planning Authorities is another key issue, as there was a reduction in spend on planning services by 43% between 2009/10 and 2020/21⁶ despite only a 16% decrease in the number of applications between 2013/14 and 2022/23⁷. This reduction in spending on planning, however, covers not only Development Management case officers, but also other areas of planning such as Planning Policy and Enforcement. This, when coupled with the fact that planning application fees (which had been frozen for a long time until they were recently increased by 20% on 6th December 2023) etc. are not mandatorily ring-fenced to the Planning Service, meaning that additional fee income can be diverted to other areas of a Local Authority. Between 2013 and 2020 there was a 25% decrease in the number of LPA planners, compared to an 80% increase in the numbers in the private sector⁸. The lack of resources in the public sector means fewer planners have a larger caseload of applications, which will inevitably slow down decision making.

The need for simplified processes

- 3.8 Alongside a lack of resources in the public sector, there are improvements that could be made to simplify decision taking. For example, through the implementation of national platforms for mapping and application submission, processing etc. These improvements in standardisation and digitisation (which Central Government has been conceptually promoting for some time) would result in real and meaningful gains in efficiency. This, however, is well outside of the purview of Runnymede Borough Council as a single Local Planning Authority.

Multiple landowners within single allocations

- 3.9 Lastly, as referenced in paragraphs 2.19 and 2.20 above, the slow delivery on some sites in Runnymede has been because of multiple land ownerships within individual local plan allocations. Whilst this is causing issues currently on a handful of sites (and this issue was not foreseen when the Local Plan was adopted), the Council is committed to carrying out master planning work for sites allocated in the next iteration

⁶ <https://www.rtpi.org.uk/policy-and-research/research-and-practice/planning-agencies/>

⁷ <https://www.gov.uk/government/statistical-data-sets/live-tables-on-planning-application-statistics#district-matter-tables>

⁸ <https://www.localgov.co.uk/Leveraging-data-to-reverse-the-planning-staff-decline/60244#:~:text=The%20level%20of%20staff%20exodus,planners%20during%20the%20same%20period.>

of the Local Plan where multiple land ownerships are found to exist to ensure that sites come forward smoothly. This is an example of the Council learning from its previous actions and making changes to the way it works and plans for the Borough to help improve the delivery of homes in the future.

- 3.10 As can be seen from the above, many of the issues that impact on housing delivery in Runnymede are considered to be national/regional issues which are beyond the Council's control, and which are likely impacting on other local authorities across the country. Further detail in relation to these can be found in Appendix 1.

What the Council has already done / is doing

Adopted Runnymede 2030 Local Plan

- 3.11 The Runnymede 2030 Local Plan was adopted on 16 July 2020. The Local Plan seeks to meet the Borough's development needs through a combination of intensifying development on brownfield land and releasing a number of sites that were previously in the Green Belt for housing.

Proactive identification of potential development sites

- 3.12 Runnymede Borough Council takes a proactive approach to encouraging landowners, agents and developers to bring sites forward for consideration for potential development to help meet the area's development needs via the Strategic Land Availability Assessment (SLAA) process. This is a technical study which assesses particular areas of land supply in the Borough to determine which are suitable, available and achievable (viable) for development.
- 3.13 As part of the regularly undertaken SLAA process, a formal call for sites was undertaken between 15 May and 16 June 2024 (with previous call for sites undertaken in 2021 and 2022), whereby landowners and local stakeholders were invited to submit potential sites for development over the next 15 years. Alongside this, in July-September of 2024, the Council undertook the initial stages of an Urban Area Capacity Study to identify potential areas within the urban (e.g. non-Green Belt) areas of the Borough. This exercise identified a notable quantity of sites for the Council to explore further for possible future development potential. A similar review is imminently to be undertaken of grey belt land in the Borough (a concept recently consulted on by the Government). The findings of this work will feed into the Local Plan review process to maximise the delivery of housing land in the Borough in future years.
- 3.14 Although the SLAA is produced periodically, it should be noted that the Council accepts site submissions year-round and not just during the formal 'call for sites' period associated with SLAA production. This is to encourage / make it easier for landowners / site promoters to put their sites forward for development. In addition to this, the Council also encourages community groups to put forward sites for development, not just those from the private sector.
- 3.15 Alongside calling for site submissions from external parties, the Council also searches for sites itself via a number of methods as part of the SLAA process. This includes:

- Any pre-application enquiries / expired permissions which might yield sites for inclusion in the SLAA.
- Undetermined planning applications at appeal.
- Planning application refusals or withdrawn applications.
- Surplus public sector land (e.g. Land owned / promoted by the Council, Surrey County Council or other public bodies such as the NHS as well as the Central Government's register of public sector land).
- Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings), identified via the Council's empty property register.
- Making productive use of under-utilised facilities such as garage blocks.
- Large scale redevelopment and redesign of existing residential or employment areas.
- Site suggestions from officers.
- Under undertaking of a desktop study of the existing urban area to identify potential additional sites through the Urban Area Capacity Study (UACS).

3.16 This is alongside the more traditional methods of site identification such as the Council's Brownfield Land Register, unimplemented / outstanding planning permissions / grants of Prior Approval.

Council housing schemes

3.17 Runnymede has set out in its most recent Housing Asset Management Plan (2021-2026)⁹ that it aims to commence the construction of 125 Council homes over the five-year period. RBC's Housing Team are in negotiations with a developer to purchase a site in Chertsey. The site is at the pre application stage, but the intention is to deliver in the region of 40 units. The Housing Team are also planning to enter the s.106 market as many Registered Providers are not now considering this route to delivery. This will help to prevent the loss of the planning obligated units. In addition, the Housing Team are at the early design stages with two Council owned sites where they intend to use Modern Methods of Construction to deliver eight units on one site plus 25 on the other. In addition to these proposals, the Housing Team are also acquiring properties that were previously sold through the Right to Buy.

3.18 In recent years, Runnymede Borough Council has delivered a number of schemes on its own land, with one of the most significant ones being Addlestone One in Addlestone town centre which incorporated a mixed-use development offering a range of small and large retail units. The development included a Waitrose and Premier Inn, a new gym, state-of-the-art cinema, multi-storey car park with over 300 spaces, and a new high street to complement the 213 brand new apartments.

3.19 More recently, Magna Square in Egham opened in the summer of 2022 and contains a four-screen cinema, a Budgens grocery store, 67 private apartments, 34 affordable homes plus an additional 1,000sqm of new commercial space at the ground floor, all encompassed by a new public realm. In addition, one of the new build blocks provides 100 rooms for students studying at nearby Royal Holloway, University of London.

⁹ <https://www.runnymede.gov.uk/downloads/file/1355/assest-management-plan-2021-2026>

Improved Decision Taking

- 3.20 The Development Management (DM) service has undertaken a number of initiatives to improve decision taking and boost the timely delivery of housing. These include:

Offering pre-application discussions to ensure issues are addressed early

- 3.21 The DM team regularly provide pre-application advice. From 1st April 2023 until 31st March 2024, a total of 116 planning enquiries were responded to via the Council's pre-application advice service. Early advice can help identify whether in principle a proposal is likely to be acceptable, the key planning issues and policies that need to be considered, where the applicant may need further specialist advice to help prepare the application and what changes maybe needed to any draft proposals. Such advice can save an applicant time in preparing an application and the time taken by the Council to make a decision on it (as less amendments or additional information is likely to be required). In the case of proposals with little prospect of approval, early advice can avoid further abortive work.
- 3.22 The pre-application service has a strong emphasis on front-loading to reduce the time spent on decision taking and need for significant numbers of planning conditions. This means a quicker turnaround can be achieved which subsequently can lead to the faster implementation of planning permissions for housing delivery (as fewer conditions need to be discharged if more information is provided up front with planning applications). There have been some pre-application enquiries which did not materialise as applications because the site was deemed to be unsuitable for housing.

Use of Planning Performance Agreements

- 3.23 The Council has a service offering planning performance agreements (PPAs) (which aligns with paragraph 46 of the NPPF (2023)) for major development proposals. The DM team is using a PPA to help bring forward the Longcross Garden Village planning applications (1700 residential units). A PPA covers pre-application advice through to the planning decision being made. It sets out timescales within which meetings will take place and a report will be presented to the Planning Committee which gives the developer certainty around time frames for a decision (although it gives absolutely no guarantee that the application will be approved by the Council).

Revised Website

- 3.24 The planning pages of the website are constantly under review to ensure that they remain up to date. This helps residents, applicants and third parties obtain up to date information about all aspects of the Planning Service.

Regular Planning management meetings

- 3.25 Regular Planning management meetings are held in the department which involve the managers from all the teams within the Planning Service. These meetings allow:
- issues arising to be raised early and discussed (or even in advance of them becoming significant);

- new/improved ways of working to be identified;
- processes to be discussed;
- best practice/new guidance to be disseminated.

3.26 For example, the Planning Policy Team may highlight the production of a new policy document at such meetings, to inform the Development Management team of new guidance that will be coming forward in specific areas to allow smooth implementation, for example, the emerging Borough-wide Design Code which is currently under production. These management meetings also enable coordination between the teams on major development proposals.

Considering compulsory purchase powers to unlock suitable housing sites

3.27 The Council has the option to utilise Compulsory Purchase Powers to help unlock potential development sites. To unlock a number of the key housing sites in the Runnymede 2030 Local Plan, Runnymede Borough Council is working closely with Surrey County Council to bring forward highway improvements to the A320 corridor. This is a £41.8 million scheme funded through the Housing Infrastructure Fund (HIF). As part of this, Surrey County Council has used their compulsory purchase powers to acquire the necessary land along the corridor to allow the improvements to go ahead and the housing to come forward. The CPO was granted on 13 December 2022.

Using Brownfield Registers to grant permission in principle to previously developed land

3.28 The Council publishes its Brownfield Register on an annual basis. This identifies all the promoted or consented brownfield sites which the Council believes to have the potential for residential development in the. This helps highlight to developers (both large and small) sites that they may want to explore further for their development potential. The Council may also consider in the future whether any of the sites can be moved to Part 2 of the Brownfield Register which will effectively grant permission in principle. This will need further consideration and would be the subject of a prior consultation process. However, as there is currently no mechanism at the Permission in Principle stage to secure conditions or planning obligations and the suitability of site also depends upon its impact on the built environment and amenity, the Council cannot currently list any site within Part 2 of the Brownfield Land Register, although this will be considered on case-by-case basis in future iterations.

Attendance at the Surrey Development Forum

3.29 Runnymede Borough Council has been a member of the Surrey Development Forum¹⁰ since it was established in 2020. This was due to a recognition that better communication and sharing of best practice is needed between developers, planners and local authorities, if Surrey County Council is to meet its 2050 ambitions as set out in the Surrey Place Ambition. Since then, the forum has continued to grow to 30 private sector members and regular engagement is provided by Surrey's local authorities.

3.30 Over the previous year (e.g. 2023), the Surrey Development Forum has continued to

¹⁰ <https://surreydev.co.uk/>

host a range of engagement activities, including:

- Six Forum meetings during the year;
- The annual conference had 160 representatives from industry, local and national politicians, and the community and presentations from a Surrey MP and the Chief Planner of The Department for Levelling Up, Housing and Communities.
- Regular meeting attendance and interaction from Homes England, National Highways, Natural England and other government agencies.

3.31 The Forum has identified the following key issues for Surrey:

- The make-up of local government - to address funding challenges and find better ways to govern;
- Utilities challenges, notably water supply and 5G broadband;
- The natural environment, ongoing mechanisms to address the landscape, air quality and biodiversity impacts of change on special protection areas and the Surrey Hills AONB;
- Transport challenges, methods to grow micro mobility (cycle/ scooters) and notably rail capacity to London;
- Gatwick and Heathrow and the M3, A320, A3, A24, M23, A21, M25 road corridors;
- Regeneration and densification challenges facing some areas and some town centres;
- The building beautiful agenda, ensuring the best quality development, in context where appropriate, or bespoke / contemporary where justified;
- Identifying sufficient development land in environmentally constrained areas is a challenge;
- Collective opinions on changes to the planning system proposed by Central Government;
- Ensuring that climate change, is better addressed in the county.

3.32 The Council's membership and attendance of the Forum enables closer working, better communication and improved information sharing between the parties involved.

Councillor Training on Planning Issues

3.33 Planning officers provide regular training sessions to all councillors. A full programme is delivered to councillors following the elections and regular updates are given throughout their term as a councillor. Planning training is also given to new councillors elected part way through a term. In addition, external specialists also provide guidance on particular topics. Overall, this results in a low level of 'Councillor overturns' of officer recommendations.

Use and review of planning conditions

3.34 A review of all planning conditions has been undertaken by senior planning officers. This has resulted in the streamlining of conditions to ensure that they meet up to date guidance on the use of conditions and to safeguard against their use where other non-

planning legislation would be more appropriately employed. Conditions are reviewed regularly and updated where appropriate to improve the planning process.

Technology

3.35 The Development Management Team has been a paperless service area now for a number of years. Paper folders for each application have been replaced using Enterprise Vault as a digital filing cabinet for all documentation associated with pre application submissions and all types of applications determined by the Department. Decision letters and other notifications/correspondence is sent digitally by default. Application documentation and plans are also no longer printed. All officers in the Development Management Team have access to Adobe Pro which enables them to measure from scaled plans on their computer screens. The use of technology has assisted in processing applications faster

Consultation with landowners, agents, developers etc. on barriers to delivery, and actions that could be taken to help boost future housing supply / delivery

- 3.36 As part of the preparation of this Housing Delivery Test Action Plan, Runnymede Borough Council consulted those on its Planning Policy consultation database which were recorded as being a landowner / agent / developer to obtain their views as to what the main barriers are restricting housing supply in the Borough and what actions could be taken to boost it in future.
- 3.37 This consultation took place between 27 March 2024 and 26 April 2024 and there were nine responses received. A summary of the comments contained in these responses are set out below.
- 3.38 In terms of the key barriers highlighted by respondents, this included a number of issues as set out below:

- The ability to obtain social housing CIL relief, particularly on sites where we may purchase the whole site with the intention of delivering non-S.106 units as affordable.
- Limited availability of allocated housing sites in the current local plan.
- The [significant] extent of Green Belt
- Inadequate and insufficient infrastructure and utilities provision.
- A lack of market incentives to bring smaller sites forward for development or redevelopment.
- Housebuilding in the UK consolidated into the hands of an oligopoly - 80% of the country's new housing is now delivered by five big companies.
- The state of the market which is compounded by the reduced activity of registered providers resulting in delays to the disposal of affordable housing units.
- The ongoing issue of the LPA's own resources and those of statutory consultees which has resulted in delays to the progress of applications, completing planning obligations and discharging conditions.
- The capacity of the LPA's legal team has directly affected the completion of legal agreements associated with planning applications.
- Having a suitable strategy for managing the delivery of Gypsy and Traveller

sites in place early on will enable this element of site design and disposal to happen smoothly.

- The pre-app discussions were misleading as they provided comment and advice which post-application stage were retracted. This resulted in much time and cost being wasted by all parties.

3.39 In terms of actions that could be taken to boost the future supply of housing, the suggestions provided are set out in the table below. The Council's response to these each is set out alongside them and generally falls into one of the following three categories:

- a suggestion raised is something that the Council is already working on / has implemented (with reference to where / how this is taking place);
- something is a new idea which the Council will consider it further; and,
- the suggestion is something that the Council will not / cannot do, and the reason(s) why.

Table 5: Suggested actions that Council be taken by Runnymede Borough Council to improve housing delivery

Suggestion	Council's response
The use of an either / or clause within the S.106 Agreements, providing certainty to LPAs that those additional homes will be delivered as affordable units but will remain unfettered by any other restrictions in the agreement.	This is something that will be explored with the Council's Legal Team to see if this type of clause would be viable and practical.
The Council establish a clear strategy for flexibility in the application of affordable housing policy / approach to post decision variations given the current absence of Registered Providers willing to take on new S.106 affordable housing.	This is something that is currently being considered and explored to ascertain whether planning committee report resolutions could be drafted differently to build in this flexibility.
The LPA should develop a strategy for addressing the needs of Gypsies and Travellers.	The adopted Runnymede 2030 Local Plan sets out the Council's strategy for addressing the needs of gypsies and travellers up to 2030 in policy SL22. The Council's strategy will be revisited as part of the upcoming update to the Local Plan.
The immediate preparation of an updated Local Development Scheme and commencing the preparation of the new local plan during 2024, with the objective of having the new local plan adopted by 2027. This Local Plan should last for a period of at least 15 years.	Due to the recent change of Government which took place after this consultation with developers etc., and the subsequent consultation on changes to the Planning system, there has been some delay to the production of an up-to-date LDS. However, it should be noted that the Council is already preparing updated evidence which will support a revised Runnymede Local Plan, which will aim to be at least 15 years. An updated LDS can be viewed elsewhere on the 23rd of October 2024 committee agenda.
A new local plan should look to allocate more than the minimum housing need figure to ensure any delays to the delivery of certain sites does not impact wider delivery in the Borough.	Various strategies for meeting housing needs including various levels of housing provision will be tested as part of the upcoming Local Plan update.
Undertake a further review the Green Belt boundaries to identify additional housing sites, particularly those on previously developed land.	The Council's Green Belt evidence is being updated at the time of writing and will underpin the next iteration of the Local Plan.

Suggestion	Council's response
The 'garden village' approach (e.g. Longcross) is a model which should be actively encouraged in other parts of the Borough.	The suitability of this approach will be considered as part of the upcoming Local Plan update.
The need to have a range of site types and sizes which can be relied upon to deliver housing.	This requirement is already part of national Planning Policy and may be strengthened by the current Government if their proposed changes to national planning policy (currently being consulted upon) are implemented. It should also be noted that the Council has already allocated sites of a variety of sizes in the currently adopted Runnymede 2030 Local Plan, with sites ranging from 40 to 400 homes, alongside the much larger 1,700-unit Longcross Garden Village allocation. In addition, there is a strong record of delivery on windfall sites (e.g. sites delivering a net addition of 1-4 homes) in the Borough over multiple years.
Working with developers on the phasing of sites and whether they can be subdivided.	The Council already aims to work constructively with developers to determine appropriate phasing arrangements for larger sites. Matters relating to potential subdivision of larger sites should be discussed with the Council, ideally at the pre application stage so that the potential implications of such subdivisions can be fully explored.
Interim guidance on housing be part of the Action Plan ahead of any Local Plan Review which could include a presumption in favour of delivering previously developed land which would align with the direction of travel from central government.	There is already (and continues to be) a presumption in favour of redevelopment of PDL in national planning policy, with this potentially being strengthened by the proposed changes to national policy that have recently been consulted upon. These proposed changes also include the potential expansion of this presumption to include more PDL in the Green Belt, as well as the existing urban areas of the Borough.
Determining the evidence concerning the viability of site's needs, prior to its inclusion in the Local Plan. This should also consider environmental considerations, especially those related to climate change.	Whole Plan viability is undertaken as part of the development of a Local Plan, as this is required by national planning policy. In addition, sites must be deemed, suitable, available and achievable (again, in line with national planning policy). As part of this process, it is considered whether, when all the policy requirements in a draft Local Plan are considered in the round, it will be viable for most sites in the Borough to come forward for development. Potential environmental policy requirements, for example any increased BNG % being considered locally, as well as any proposed climate change/sustainable design

Suggestion	Council's response
	requirements which emerge through the update of the Local Plan will be tested through the whole plan viability work.
Ongoing dialogue should be maintained with statutory utilities (electric and water) providers through the local plan process to ensure they are proactive rather than reactive in respect of planning for and delivering network upgrades.	As part of the duty to cooperate, which forms an ongoing part of Local Plan development and production, the Council is required to consult with a wide variety of statutory consultees, including utilities providers. The Council works in collaboration with these companies and their modelling experts at regular intervals to provide them with existing and emerging Local Plan allocations so they can be considered in future network upgrade plans. The Council also regularly provides these companies with up-to-date data on housing delivery and site development progress.
The Council should arrange quarterly / half yearly 'Developer Forum' sessions to ensure the Council is aware of evolving challenges in the planning system and can respond proactively before they start to materially impact delivery rates.	As noted in paragraphs 3.30-3.33 above, the Council is already a member of and attends the Surrey Developer Forum. This enables the development industry and the Council to engage with each other to ensure that issues relating to housing delivery can be raised and discussed.
Greater levels of resourcing or outsourcing to external lawyers to progress resolutions to grant to planning permissions.	As noted in paragraph 2.27 above, the Council is now utilising capacity from the private sector (which started in 2023) which has and will continue to assist with the timely processing of legal agreements.
A more sophisticated, front-loaded pre-application process, also involving other statutory consultees.	As noted in paragraph 3.22 and 3.23 above, the Council already seeks to have pro-active pre-application advice discussions with applicants. Statutory consultee also have their own pre-application advice services which the Council has not control over.
The use of Planning Performance Agreements- the commitments of each party within these agreements should be clearly set out, alongside a commitment that they will be adhered to.	As set out at paragraph 3.24 above, the Council already make use of these agreements where appropriate, which takes the applicant through from the pre-application advice stage through to the decision being made. It does not, however, guarantee that permission will be granted.
The Council should ensure that it highlights the importance of engagement with the statutory bodies to said bodies, to ensure that the wider ramifications, including on housing delivery are recognised.	The Council regularly engages with a variety of statutory consultees through both the plan making and decision taking processes. The response time of statutory consultees falls outside the remit of the Council, although the Council does work proactively with consultees to secure timely responses where possible.

Suggestion	Council's response
<p>Establish a more proactive Call for Sites approach would enable continuous dialogue and the ongoing submission of information. Some LPAs, for example Harborough District Council, have implemented a 'Local Plan Site Promotion Service'. Harborough District Council charges for that service, but it provides an opportunity for promoters to discuss how they can best promote sites to the emerging Local Plan, and therefore the information which might assist the Council in assessing individual proposals.</p>	<p>As noted at paragraphs 3.13 and 3.14 above, the Council already regularly undertakes call for sites exercises, actively seeking new site submissions, alongside accepting site submissions outside of these more formal periods. The intensification of this process, or the provision of a more formalised service is something that could be considered by the Council as part of the preparation of a new Runnymede Local Plan, which the Council is seeking to start soon.</p>
<p>The Council should simplify planning conditions imposed on planning permissions, the number of conditions, as well as the 'trigger point' at which information is required.</p>	<p>As noted primarily at paragraph 3.35 as well as other places in this document, the Council has and continues to regularly review its use of planning conditions. It also provides advice during the prep application stage on how the provision of upfront information on certain matters with a planning application can help reduce the need for them.</p>
<p>Whilst site-specific and scheme-specific viability considerations are considered when allocating sites, this should be continually reviewed as sites progress through the application process.</p>	<p>This is something that could be done through the use of end-scheme viability reviews to help ensure that where a scheme is able to do so, a financial contribution toward additional affordable housing can be secured within a S106 agreement. This may not result in the total number of homes provided increasing (as they will have been built by the time it has been completed) but would result in additional funding toward delivery of greatly needed affordable homes.</p>

3.40 As can be seen from the above table, the Council is already implementing / working on a number of the suggestions made. There are also a number of issues that have been raised, (e.g. changes to s.106 agreements, a more formalised site submission service etc.) that the Council could implement either as part of the way it manages the planning application process, or as part of the next iteration of the Local Plan. These actions are therefore captured in table 6 below 'Future Actions'. Lastly, there were some suggestions, that whilst potentially helpful to the delivery of housing, lie outside of the Council's control, e.g. relating to the engagement by statutory consultees / utilities providers into the Local Plan / forward planning / planning application process.

4. Future Actions

- 4.1 The Council will continue to positively look for further opportunities to increase its housing delivery and will work closely with the relevant Council services and external stakeholders to achieve this.

Continued implementation of the adopted Local Plan

- 4.2 As part of its implementation of the adopted Local Plan, the Council is seeking to support the delivery of allocated sites as well as suitable non allocated sites which are brought forward. The adopted Local Plan allocates a number of medium and large sized sites across the Borough for housing delivery, with many of them progressing through the planning system. Officers across the Planning Policy and Development Management Teams continue to support applicants as these sites are brought forward. This includes through the pre application, application and post application phases.
- 4.3 It is recognised however that there are still a handful of allocated sites which have not yet come forward for development. Whilst some of these landowners have been contacted in the recent past regarding their intentions, Officers will contact those who have not been contacted in the last six months to see if there are any barriers to the sites coming forward, and to offer assistance where appropriate.

Review and update of the Runnymede 2030 Local Plan

- 4.4 The Council has made the decision to review and update the Runnymede 2030 Local Plan, and the Council's Local Plan timetable is published on its website¹¹. In advance of Plan Making formally commencing, officers continue to refresh certain elements of the evidence base.
- 4.5 The Strategic Land Availability Assessment (SLAA) is a key piece of evidence for the Local Plan and will be updated regularly to ensure that the position in terms of available and potentially suitable land for housing is understood. The Council is in the process of updating the SLAA for 2024. In line with Planning Practice Guidance, officers are proactively identifying sites, including publicly owned land and brownfield land for development to ensure that all potential sources of supply are explored. The Council has also run a call for sites in May-June 2024 during which landowners and site promoters were able to submit potential development sites for consideration in the next iteration of the SLAA. Alongside this, and as part of informing and preparing the SLAA, but also building and developing relations with developers / landowners / agents for sites that could deliver five or more net additional residential dwellings, the Council maintains regular contact to confirm the anticipated delivery timeframes of sites in the pipeline.
- 4.6 The SLAA will inform the policies on housing in the future iteration of the Local Plan and acts as the starting point in determining which sites will be allocated. The updated Local Plan will help ensure that a sufficient supply of housing sites is coming forward in the Borough until the early/mid-2040s. Following the adoption of the replacement Local Plan, the Council will work with stakeholders to help support the delivery of allocated

¹¹ [Local Development Scheme \(LDS\) – Runnymede Borough Council](#)

sites where possible.

- 4.7 As an action, where suitable development sites are identified through the 2024 call for sites and which officers are of the view could come forward in advance of the updated Local Plan, officers will proactively contact the site promoters / landowners with the aim of encouraging planning applications to be progressed on these sites. This will include sites that have been independently identified by the Council, e.g. through exercises such as the Urban Area Capacity Study.
- 4.8 The Council is in the early stages of developing a Runnymede Design Code, which will include a set of clear, measurable rules that aim to improve and assess the design of development. The priorities for the Design Code will be identified throughout the course of the project, informed by community engagement, but it is anticipated that ‘built form’ and sustainable construction will be core themes. The National Design Guide defines the ‘built form’ of an area as the ‘three-dimensional pattern or arrangement of development blocks, streets, buildings and open spaces’ that make up any built-up area or development.
- 4.9 As part of this theme, there is scope for the Runnymede Design Code to set out clear parameters for density, grain, building line and height, including where local variations in density may be desirable to create a variety of identify without harming local character, whilst also making the most efficient use of land to meet housing needs. The Design Code can provide clarity and greater certainty, for example, about how redevelopment and intensification of Runnymede’s lower density areas can successfully deliver new development at higher density ranges in particular locations of the Borough, which also reflect local character and design preferences. The Design Code will be more prescriptive and precise than the existing Runnymede Design SPD, and it is anticipated that the Design Code will eventually form part of the development plan for the area. Once adopted either as part of the updated Local Plan or as a Supplementary Plan, its coding rules will then carry full weight in decision-making on new development proposals in the Borough and play a significant role in local policy on built form going forward.

Proposed actions to increase housing delivery

- 4.10 Actions which are being implemented or are planned to be implemented to improve housing delivery are set out in the table below.

Table 6: Proposed/ ongoing actions

Action	Service	Date
To review the standard planning conditions.	Development Management	Ongoing
To continue to review the discharge of planning conditions to speed up the process.	Development Management	Ongoing
To continue to liaise with applicants following planning permission to speed up procedures, especially the discharge of planning conditions, to enable an early start on site as possible.	Development Management	Ongoing

Action	Service	Date
To review the time condition now imposed on all new residential planning permissions requiring development to commence within a two-year rather than three-year period within a shorter timescale than the relevant default period, where this would expedite the development without threatening its deliverability or viability.	Development Management	Ongoing
To continue to improve planning performance on speed of decision making.	Development Management	Ongoing
To continue to improve planning performance on quality of decision making.	Development Management	Ongoing
Continue to work based on the presumption in favour of redevelopment of PDL, in line with national planning policy.	Development Management	Ongoing
To continue to improve the way of working between DM and Environmental Health in respect of planning conditions.	Development Management	Ongoing
To continue to provide on-going member training particularly in relation to housing delivery.	Development Management	Ongoing
To continue to provide on-going planning officer training.	Development Management	Ongoing
To further refine the programme of Idox measures to enhance agile / paperless working in DM.	Development Management	Ongoing
To further refine the programme of Enterprise measures for DM staff to manage workloads and performance, improve the use of resources and efficiency / performance.	Development Management	Ongoing
To continue to develop and offer a proactive pre-application service to support the delivery of sustainable development.	Development Management	Ongoing
To continue to speed up the process of signing of legal agreements.	Development Management	Ongoing
To explore the use of an either / or clause within the S.106 Agreements, providing certainty to LPAs that those additional homes will be delivered as affordable units but will remain unfettered by any other restrictions in the agreement.	Development Management/ Legal Services	Ongoing

Supporting Wider Housing Opportunities

Action	Service	Date
To continue dialogue with developers and landowners on build out rates and to obtain information on barriers to delivering housing.	Planning Policy	Ongoing
To work with site promoters / landowners and other stakeholders to deliver the Runnymede 2030 Local Plan and its allocations.	Planning Policy	Ongoing
The need to have a range of size and type of	Planning Policy	Ongoing

Action	Service	Date
sites to deliver housing.		
Deliver an updated Local Development Scheme to set out the timetable for the delivery of the next Local Plan for the Borough.	Planning Policy	Due to potentially be agreed to the Council's Planning Committee on 23 rd October 2024.
Produce updated SLAAs as required during the Local Plan development process.	Planning Policy	Ongoing
To implement the current strategy for the delivery of Gypsy and Traveller accommodation as per the Runnymede 2030 Local Plan, and then develop a new one for the next Local Plan.	Planning Policy	Ongoing
Continuous and ongoing dialogue with utilities / infrastructure providers to ensure the provision of these services.	Planning Policy	Ongoing
To Review the Council's Green Belt evidence as part of the review of the current (and thus the preparation of the next) Local Plan.	Planning Policy	Ongoing
To consider viability of sites prior to their inclusion in the Local Plan.	Planning Policy	Ongoing
Continued attendance at the Surrey Developer Forum.	Planning Policy	Ongoing
To continue to seek to achieve the maximum amount of Affordable Housing.	Planning Policy and Development Management	Ongoing
The Council will continue to facilitate the delivery of affordable housing by developing Council owned sites.	Housing	Ongoing
CIL and S106 agreements – To continue to improve processes and improve monitoring.	Planning Policy / Development Management	Ongoing.
Explore the potential to introduce a 'Local Plan Site Promotion Service' to provide the opportunity for promoters to discuss how they can best promote sites to the emerging Local Plan.	Planning Policy	Winter 2025

Next Steps

4.11 The actions identified in table 6 above will be implemented and monitored over the next year by the Council's Development Management, Planning Policy, Assets and Regeneration and Housing teams. The Housing Delivery Test results will be issued for each authority on a rolling annual basis. If Runnymede does not meet the test in future years, Housing Delivery Test Action Plans will continue to be produced by the Planning Policy Team.

4.12 The Council welcomes any suggestions to improve the delivery of housing in Runnymede.

Appendix 1

1. Key challenges

- 1.1 This appendix seeks to elaborate on some of the key challenges referred to in the body of this report and which are considered relevant as part of wider discussions related to housing delivery in Runnymede.
- 1.2 COVID-19: the global pandemic and the associated lockdowns, particularly lockdown 1 which took place between March and July 2020, have had a significant impact on the national economy. There was also an absence of major and minor applications submitted in the period following March 2020 and this will undoubtedly result in a lag in applications, permissions and eventual implementations.
- 1.3 Increasing numbers on the Housing Register: Since 2018/29, the number of applicants on the Council's Housing Register has fluctuated, but overall stayed relatively stable. The figures are as follows:
- 2018/2019: 1,125
 - 2019/2020: 985
 - 2020/2021: 1,155
 - 2021/2022: 1,199
 - 2022/2023: 1,207
 - 2023/2024: 1,151
- 1.4 High rates of statutory homelessness: Between 2018/19 and 2023/24 there was an average of 65 households for whom we have a duty to provide accommodation per year.
- 2018/2019: 85
 - 2019/2020: data not recorded
 - 2020/2021: 71
 - 2021/2022: 51
 - 2022/2023: data not recorded
 - 2023/2024: 51
- 1.5 High cost of emergency and temporary housing for homeless households: The average cost to the Council to accommodate a homeless household consisting of one adult and one child in emergency housing is approximately £45-60 per night, which over the period of which the Council has a duty to house them could total up to £3,360. The costs can, however, vary from this due to the size of the family etc.
- 1.6 Increasing affordability issues: ratio of the median house price to the median wage in the area¹² in 2022 was 12.05 for Runnymede and there has been a significant rise over the past decade, with Runnymede outpacing the ratios for both the South East (10.38) and England (8.28). It is widely acknowledged that homes are very expensive in

¹²

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoresidencebasedearningslowerquartileandmedian>

Runnymede. The private rental market has seen a huge increase in demand over recent years, but with many landlords leaving the market, this has impacted on availability and rental prices. In the past residents in receipt of benefits would “top-up” the difference between their housing related benefits and the rent that they are charged. The cost-of-living crisis means that other bills such as food and energy have gone up leaving these households less able to cover their total household costs. Getting on the housing ladder is very difficult with first time buyers needing very large deposits. This not only delays or prohibits people from becoming homeowners, but it also pushes people into privately renting.

1.7 Lack of new-build affordable housing: The net increase of provision over the past five years has been 287 units – an average of 57 per year¹³ (see the data under Objective 2 of the Council’s 2022/23 Annual Monitoring Report). National policies, specifically relating to First Homes and Shared Ownership, have not achieved much in terms of addressing local housing need. These products do not require a local connection and will often go to people that are moving into the Borough. Many new build affordable rented properties are let at the full 80% of a market rate. Locally, this can be very expensive for working households. Recently there has been an increase in the number developers reporting to the Council that they cannot sell the S.106 sites. This is because many Registered Providers have decided to focus on other development opportunities that more closely align with the targets that Homes England set them. In addition to that, RPs are struggling to stretch their budgets to cover the cost of borrowing, retrofitting energy performance measures, fire safety works and keeping up with maintaining the decent homes standard. RBC are planning to develop affordable housing that will be let at 65% of the market rate.

1.8 There as are other issues affecting the housing market in Runnymede including:

1.9 Key worker accommodation: whilst housing affordability is generally a significant issue, it acutely affects key workers, who help to run essential local services such as schools, hospitals, doctor’s surgeries, fire stations etc. According to 2021 Census data¹⁴, gross median weekly pay in Runnymede is £676.50, which equates to £35,178 annually, in line with the Surrey average (see the table below). However, the starting salary for essential local workers is much less. We know anecdotally that key worker staff are moving further and further away from Runnymede into Hampshire and Berkshire and commuting to work. This means that when they look for their next promotion, they are more likely to look in those areas; this is another factor leading to loss of workforce. Whilst some key workers are being recruited from London, one of the main factors which will keep them in Runnymede is availability of affordable housing. The Council is seeking to tackle this through the provision of key worker housing in the allocation at St Peter’s Hospital site (under Policy SL13) in the Local Plan.

Local authority	Average weekly pay	Annual equivalent (weekly pay x 52)
Surrey Heath	£759.10	£39,473.20
Woking	£725.50	£37,726.00

¹³ <https://www.runnymede.gov.uk/downloads/download/87/monitoring-progress-of-local-plan-policies>

¹⁴ <https://www.ons.gov.uk/peoplepopulationandcommunity/wellbeing/articles/subnationalindicatorsexplorer/2022-01-06#E07000212>

Local authority	Average weekly pay	Annual equivalent (weekly pay x 52)
Reigate and Banstead	£722.40	£37,564.80
Epsom and Ewell	£710.60	£36,951.20
Waverley	£699.50	£36,374.00
Runnymede	£676.60	£35,183.20
Spelthorne	£671.50	£34,918.00
Elmbridge	£669.40	£34,808.80
Guildford	£667.10	£34,689.20
Mole Valley	£621.10	£32,297.20
Tandridge	£559.80	£29,109.60
Average	£680.24	£35,372.29

1.10 Subsidies: as affordable housing is provided at up to 80% of the market rate, subsidies are essential to make it viable. A private developer who pays market rate for land, finance, supplies and labour has to sell their properties at market rate to make a profit. When Runnymede is acting as the developer, even if there is no profit, it is still difficult to deliver truly affordable housing. Housing for rent can pay for itself over time because of the rental income it generates. However, the Council needs to be able to forward fund such developments and the cost of finance for the acquisition, development and construction stages is prohibitive unless they receive Government subsidy. This is similar to the way Housing Associations operate – having a market rate product to sell and rent, the surplus of which subsidises the affordable elements of their business. The bottom line is that, even with the Government grant funding available through Homes England, affordable housing developments need significant capital investment and cashflow to deliver.

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