

**Spelthorne Borough Council**

**Housing Delivery Test Action Plan**

**May 2019**



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## **1. Introduction**

### **Why Housing Delivery is important**

- 1.1 There is wide publicity over the national housing crisis which we are experiencing 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. In the 2017 Budget, the Government announced that it would enable the housing market to deliver 300,000 homes a year on average by the mid-2020s. This objective to increase the number of new homes is reflected in the revised National Planning Policy Framework (NPPF), February 2019 and the introduction of the Housing Delivery Test.
- 1.2 The Housing Delivery Test Result for Spelthorne Borough Council was published by the Secretary of State on 19 February 2019. Spelthorne Borough Council scored 63%. As a result, and in response to this, the Council has produced 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 The planning policy context to housing delivery contained in national and local plan policy is contained as Information Document 1 in Appendix 1.
- 1.4 An analysis of the housing delivery in Spelthorne is set out in Information Document 2 in Appendix 2. This includes the housing delivery test calculation for Spelthorne, housing land supply, need, delivery and trajectory and also planning performance.

## **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 Government's National Planning Policy Framework to boost significantly the supply of homes and has five goals:
  - To examine the possible causes of the 'under delivery' of new homes in the Borough.
  - To explain what the Council has been doing so far to boost housing delivery.
  - To gather evidence on sites with planning permission (and sites under construction for housing development) to understand what barriers are preventing homes being built on these sites.

- To build relationships with developers, landowners and agents responsible for building homes on sites that have planning permission, allowing the Council to adopt the role of an enabler of much needed residential development ensuring housing permissions are built out as quickly as possible.
  - To set out what actions the Council can take to increase the rate and number of homes built in Spelthorne.
- 2.2 Building houses is often a complex process. Often there are other factors beyond the council's control which explain why sites 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.
- 2.3 Table 1 sets out the Council's corporate documents which all play a role in the delivery of housing.

**Table 1 Spelthorne's corporate documents**

| Corporate Document   | Overlap with Action Plan  |
|--|---|
| Spelthorne Core Strategy and Policies DPD Document, February 2009. | Housing Requirement Figure – 166 dwellings per annum superseded by housing need of 590 (+20% buffer) dwellings per annum (2014)   |
| Replacement Local Plan   | A replacement local plan is currently being prepared. The Local Development Scheme states that consultation on the preferred options following the issues and options will commence around October 2019. The final adoption is anticipated to be by the summer of 2021. |
| Corporate Plan 2016 -2019  | Identifies four priorities: <ul style="list-style-type: none"> <li>• Housing</li> <li>• Economic Development</li> <li>• Clean and Safe Environment</li> <li>• Financial Sustainability</li> </ul>   |
| The Capital Strategy, February 2019                                | The Capital Strategy is to “ <i>invest, create, and deliver</i> ”. The Council is: <ul style="list-style-type: none"> <li>• investing in commercial property which will deliver an ongoing sustainable income stream to support development activity</li> </ul>         |

| Corporate Document   | Overlap with Action Plan  |
|--|---|
|  | <ul style="list-style-type: none"> <li>• creating new housing for residents and regenerating the borough's town centres</li> <li>• delivering the affordable homes which the market fails to provide and prioritising people who are on the Council's Housing Register.</li> </ul>  |
| <p>Spelthorne Housing Strategy 2014 – 2019</p> <p>N.B. Revised Housing Strategy 2015-2020 likely to be adopted by the end of 2019.</p> | <p>Strategic priorities 2014-2019:</p> <ul style="list-style-type: none"> <li>• Increase the supply of new homes and improve the tenure mix especially the provision of more private rented accommodation.</li> <li>• Improve the quality of existing homes.</li> <li>• Prevent homelessness</li> <li>• Support residents to access affordable, well-managed market rent and social rented properties.</li> <li>• Prioritise social housing allocations to those who contribute.</li> </ul>   |
| <p>Housing Strategy Action Plan</p> <p>NB to be revised to reflect updated Spelthorne Housing Strategy</p>                             | <p>This identifies the action required to implement the strategic priorities in the Spelthorne Housing Strategy.</p>  |
| <p>Homeless Strategy 2014 - 2019</p>   | <p>This identifies eight strategic priorities:</p> <p>Adopt a corporate and partnership commitment to preventing homelessness.</p> <p>Develop and provide a comprehensive preventative housing options service including the single homeless.</p> <p>End the use of bed and breakfast accommodation for families.</p> <p>Facilitate the discharge of the homelessness duty into the private rented sector.</p> <p>Through the Housing Forum develop housing pathways for vulnerable groups.</p> <p>Develop a private sector offer through working with local landlords and through a SBC lettings</p> |

| Corporate Document                 | Overlap with Action Plan  |
|------------------------------------|---|
|                                    | <p>agency that will acquire properties for the discharge of the duty and where necessary as temporary lets.</p> <p>In collaboration with Runnymede and Elmbridge Councils): Adopt a 'no second night out' for emergency accommodation.</p> <p>In partnership with the CAB prevent mortgage repossessions.</p> |
| Economic Development Strategy 2017 | The Spelthorne Economic Strategy was adopted on 22/02/2017. The Economic Development Engagement Group endorsed the annual refresh of this strategy on 24/04/2019. It sets out the actions the Council will be taking over the next 4 years to further secure the sustainable growth of the local economy.     |

#### Assessment of under-delivery

- 2.4 Within this section, an assessment of the 'under delivery' of new homes in the Borough is considered which includes the local and national issues which influence housing delivery. A range of data and sources have been used to inform this analysis. As part of this process, the Council has engaged with stakeholders to improve its understanding of the issues effecting housing delivery. The analysis of the issues has been used to inform what actions the Council need to take to improve its housing delivery.

#### **Implementation of Planning Permissions**

- 2.5 Once planning permissions have been granted, local planning authorities have limited influence over deliverability. The timescales for implementing a planning permission is generally not considered to be a significant issue within the Borough. Under planning legislation, permission is required to start within three years from the date of the decision notice. Implementation generally occurs within the permission period. The NPPF advises at para. 76 that:

*“To help ensure that proposals for housing development are implemented in a timely manner, local planning authorities should consider imposing a planning condition providing that development must begin within a timescale shorter than the relevant default period, where this would expedite the development without threatening its deliverability or viability. For major development involving the provision of housing,*



*local planning authorities should also assess why any earlier grant of planning permission for a similar development on the same site did not start”.*

- 2.6 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 former Centrica site in Staines-Upon-Thames.
- 2.7 Planning Officers have continued to build relationships with developers, landowners and agents and carry on a dialogue after planning permission is granted. They have taken a proactive approach on non-implemented planning permissions by contacting applicants/agents where planning permission had been granted for 5+ dwellings. Information was requested on the following:
- The date that development will commence on site.
  - A brief summary of your project delivery plan and timescales.
  - The reasons for any delays or particular obstacles to progress.
  - Any actions the Council could take to help you speed up the delivery of housing.
- 2.8 In addition, sites were identified where development is under way for 5+ dwellings and applicants were contacted to provide similar information to the four points identified above but with the first point being replaced with a query over:
- The current stage of development.
- 2.9 A summary of the sites in question and the responses received are contained in Table 22 Appendix 5 (sites under construction) and Table 23 Appendix 6 (sites with outstanding planning permission). There are several applications, especially where construction has not yet commenced, which did not receive a response from the applicant and/or agent on the information requested in the bullet points above. These related to a sites with a range of dwelling numbers, the maximum being 100 dwellings although a number contained less than 15 dwellings. On the sites under construction, a large number have either been completed or are anticipated to finish this year and will form part of Spelthorne's housing completions in the following years. A few of the responses received identified the reduction of the time taken to discharge conditions as a potential action to speed up the delivery of new homes, including pre-commencement conditions. This will be considered within the Action Plan below. Overall, no significant barriers to the delivery of the development were raised.

- 2.10 On the sites where development has not yet commenced, various reasons were cited. These include, the cost of implementing the permission, two sites being sold to another developer, one in the process of being sold and four are currently proposing alternative schemes. Three sites are either now under construction or have been completed. Two sites referred to the discharge of conditions with one of these commented over the time taken to deal with these. This will be considered in the Action Plan below.

#### Planning Decision Making Performance

- 2.11 The performance of decision making on planning applications is not considered to be a barrier to delivering new homes. Planning applications are being processed within the statutory timeframes. The performance for the Local Planning Authorities (LPAs) are measured on their performance based on the % of planning applications they determine within 8 or 13 weeks (or within an extension of time agreed with the applicant). For several years the targets have been as follows:

Majors – 60% within 13 weeks

Minors – 65% within 8 weeks

Others – 80% 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, 1,000 sq. m or more of new commercial floorspace or sites with an area of more than 1 hectare.

Minor development is defined as:

Up to 9 residential units, up to 999 sq. m of new floorspace, changes of use

Others – mainly householder schemes

- 2.12 In the last financial year (April 2018 – March 2019) – Spelthorne met all three performance measures as shown in Table 2.

**Table 2 Planning DM Performance (April 2018 – March 2019)**

| Majors |           |                        |              | Minors |           |                        |              | Others |           |                        |              |
|--------|-----------|------------------------|--------------|--------|-----------|------------------------|--------------|--------|-----------|------------------------|--------------|
| Total  | On Target | % on Target (i.e. 60%) | Govt. Target | Total  | On Target | % on Target (i.e. 65%) | Govt. Target | Total  | On Target | % on Target (i.e. 80%) | Govt. Target |
| 30     | 29        | 97%                    | 60%          | 161    | 143       | 89%                    | 65%          | 523    | 502       | 96%                    | 80%          |

2.13 The Government has recently also been assessing LPAs in terms of planning performance on the following criteria:

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

2.14 With just a few minor exceptions, non-major equates to a combination of the “minor” and “other” categories referred to above.

2.15 The quality measurement is 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. The threshold for speed is **60%** (majors) and **70%** (non-majors) and the **higher** the figure, the better the performance.

2.16 On those sites where planning permission was refused, the appeal performance is good. The Council's assessment against the Government's targets is set out in table 3:

**Table 3 Spelthorne's assessment against Government targets**

| Measure and type of Application  | 2019 Threshold and assessment period           | Spelthorne's Performance                    |
|----------------------------------|--|---|
| Speed of major Development       | <b>60%</b><br>(October 2017 to September 2019) | <b>95%*</b><br>(October 2017 to March 2019) |
| Quality of major Development     | <b>10%</b><br>(April 2017 to March 2019)       | <b>3.8%</b><br>April 2017 to March 2019)*   |
| Speed of non-major Development   | <b>70%</b><br>(October 2017 to September 2019) | <b>93%*</b> (October 2017 to March 2019)    |
| Quality of non-major Development | <b>10%</b><br>(April 2017 to March 2019)       | <b>0.6%</b><br>April 2017 to March 2019)*   |

- 2.17 In addition, it should be noted that to the year to March 2019, there were no applications allowed on appeal relating to the creation of additional dwellings.
- 2.18 These statistics demonstrate the soundness of decision making by Planning Development Management and that unsound decisions are not being made which would lead to unnecessary delays and costs to the delivery of new homes. However, close monitoring of the quality assessment for major applications is continuous due to the relatively small number of major applications received and the risk that the LPA could be the subject of Designation by Central Government. If this occurs, applicants may apply directly to the Planning Inspectorate for permission. The Planning Committee is updated regularly with reports on Planning Performance.

### Capital Strategy

- 2.19 The Council's Capital Strategy, 2019, recognises the need to "Invest, Create and Deliver"; create new housing for residents and regenerate the Borough's town centres and deliver the affordable homes which the market fails to provide and to prioritise people who are on the Council's Housing Register.
- 2.20 In the 1990s, the Council used to provide traditional council housing. However in 1996, it was decided to transfer the council housing stock to what was then Spelthorne Housing Association and is now part of A2Dominion. The main reason for the transfer of properties at the time was the need to bring the properties up to an acceptable state of repair, which the Council could not afford at the time. Since then, the Council has not had a direct role in developing new homes; this has been carried out by A2Dominion and other Registered Providers, as well as private developers. Fluctuation in the delivery of new housing has been dictated by the economy and the availability of grant funding to subsidise affordable housing.
- 2.21 The Council's Housing Strategy 2014-19 contains five strategic priorities which contribute to achieving the overall vision of 'ensuring best quality homes in a thriving and sustainable community'. Additionally, the Council is required to have a Homelessness Strategy, which outlines the Council's approach to preventing homelessness.
- 2.22 In common with many other local authorities in the South East, Spelthorne has a growing demand for genuinely affordable housing and is facing a number of key challenges. These include:
- Increasing numbers 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
  - The effect of our proximity to London
  - Heathrow expansion
  - Key worker accommodation

- 2.23 Further details on the key challenges are contained in Information Document 3 at Appendix 3.

### **3. Action Plan**

- 3.1 This section sets out the actions that the Council has already taken to increase housing delivery and the future actions required to continue this work. The Council is fully committed to working proactively to deliver the homes that Spelthorne needs, including a range of housing types and affordable housing. The need for an up to date Local Plan is a corporate priority and will assist in boosting the borough's housing supply as well as responding to housing needs whilst balancing the objectives in the local plan, including green belt and environmental protection. It is acknowledged that the delivery of new homes has a wider remit than just the Planning Service and requires actions to be undertaken by other Council services including the Housing Service and the Asset and Property Management Services.

#### **What the Council has already done**

##### The New Local Plan

- 3.2 The second Regulation 18 consultation is scheduled to take place in October 2019. This is when consultation will focus on preferred options including proposed allocation sites. The overall approach is to provide housing development in a combination of intensifying development of Brownfield land, growth within Staines-upon-Thames and removing weakly performing sites from the Green Belt but with additional safeguards to take account of the public's views on loss of Green Belt.
- 3.3 It is estimated that the five year housing land supply in the Borough is 3204 units. Of the sites identified in the Strategic Land Availability Assessment (SLAA) 2018, over 1,500 units on the identified sites are expected to be delivered in Staines-upon-Thames, with around 1,000 to be delivered on publicly owned sites. In the medium term (6 to 10 years), publicly-owned sites could deliver another 450 units (with other sites not owned by Spelthorne bringing forward approximately 350). The SLAA 2019 is currently being updated and seeks to identify additional sites to contribute to the Borough's land supply. This will inform which sites are allocated for development in the Local Plan.

##### Council/Knowle Green Estates housing schemes

- 3.4 The Housing Strategy Action Plan identified areas aimed at increasing the supply of new homes and improving the tenure mix in the borough. One of

these was to develop a SBC housing company or Special Purpose vehicle for the purpose of developing new affordable housing homes for rent.

3.5 The Council's Capital Strategy states that it will help to deliver two key goals contained in the Corporate Plan:

- To deliver much-needed housing in order to help reduce homelessness locally, increase affordable provision and help meet the overall need for additional homes
- To regenerate our town centres so that we can contribute to the economic development of the Borough.

3.6 The Council formed its housing company, Knowle Green Estates (KGE), in 2016 to help to achieve these two key goals when Harper House in Ashford was acquired for emergency accommodation. KGE identified a need to promote the Council's own affordable housing schemes, and KGE is the vehicle used to deliver them to residents. There are a number of projects in the pipeline which will deliver some 20% of the Borough's assessed 5-year land supply requirement in the Local Plan (628 units to be delivered by the Council out of a required 3,218).

3.7 KGE performs several functions on behalf of Spelthorne Borough Council, as outlined in the table below.

**Table 4 Knowle Green Estates**

|                    | Owned by | Developed by | Managed by |
|--------------------|----------|--------------|------------|
| <b>Investments</b> | Council  | n/a          | KGE        |
| <b>Municipal</b>   | Council  | Council/KGE  | KGE        |
| <b>Residential</b> | KGE      | Council/KGE  | KGE        |

3.8 To date, KGE has delivered the following:

Churchill Hall, Churchill Way, Sunbury on Thames

Planning Application no 16/02045/FUL

Three new rented dwellings

Approved 08/02/17

Completed and occupied 28/09/18

Former Bugle PH, 73 Upper Halliford Road, Shepperton

Planning Application no 17/01028/FUL

6 no. 2 bed and 2 no. 1 bed flats

Approved 23/08/17

Occupied February 2019

Ceaser Court (formerly Benwell House), Green Street, Sunbury on Thames

Planning Application nos. 17/01847/PDO, 18/00123/FUL and 18/00529/FUL

Conversion and extensions to provide a total of 57 units including 12 affordable units  
22 x one bed, 35 x 2 bed  
Approved 2018  
To commence on 14/06/19  
Anticipated completion 19/07/20

### **Improved Decision Making**

- 3.9 The Planning DM service has undertaken a number of initiatives to improve decision making. These include:

Offering more pre-application discussions to ensure issues are addressed early.

The Council DM Planning Officers regularly undertake pre-application advice. In 2018 a total of 391 planning enquiries were dealt with. 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 may be needed to any draft proposals. Such advice can save an applicant time in preparing the application and also the time taken by the Council to make a decision on it. In the case of proposals with little prospect of approval early advice can avoid further abortive work. It can also quickly identify solutions to problems and therefore save costs. The improved pre-application service has a strong emphasis on front loading to reduce the time spent on decision making and use of planning conditions. There have been some pre-application enquiries which did not materialise as applications because the site was deemed to be unsuitable for housing. Some examples of development which were the subject of pre-application advice and which were amended and approved relatively quickly are: Venture House for six flats (15/01352/FUL), Rear of Imtech House for 26 flats (16/00196/FUL) and the former Bugle Public House for eight flats (17/01028/FUL).

Use of Planning Performance Agreements

The Council has introduced a new service offering planning performance agreements (PPAs) for major development proposals. This is one of the factors that might otherwise put them off putting in an application in the borough. However, it gives absolutely no guarantee that the application will be recommended for approval. The Planning DM service has received a positive take up on PPAs for larger schemes, for example, Shepperton Studios, with more currently being drafted. 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 timeframes for a decision. They have enabled the DM planning officers to make use of expert advisors to assist on complex issues in the consideration of the planning application and formulating a well-reasoned recommendation.



#### Revised Web Site

The planning pages of the website have recently been updated. This will help residents, applicants and third parties obtain up to date information about all aspects of the Planning Service.

#### Increased presentations to Councillors on major planning applications

Presentations to members by on larger complex schemes, usually at the pre-application stage, have taken place a number of times over recent years. These enable Councillors to view the proposals at an early stage before they are made public, to ask questions and clarify issues and raise concerns, which need to be addressed. To avoid risk of pre-determination, Councillors do not give an opinion at the meetings. Recently, DM officers made, for the first time, a presentation to Councillors on a complex planning application (Shepperton Studios) after the Planning Committee agenda had been made public and before the meeting. This gave the Councillors an opportunity to receive a full explanation of proposals and a summary of the planning position, to ask questions and to seek clarification on issues but not to reach a decision.

#### The Community Infrastructure Levy (CIL)

The Community Infrastructure Levy (CIL) was implemented on 01 April 2015. These contributions are used to fund local infrastructure in the Borough. The implementation of CIL has resulted in reducing the amount of time spent on negotiating Section 106 Agreements between the developers and the Local Planning Authority. In 2017 the Council employed a fulltime CIL officer who provides a dedicated resource for the implementation of CIL. Following discussions with neighbouring boroughs, the Council has purchased new dedicated CIL software (Exacom) which will improve the monitoring of CIL and s106 agreements.

#### Considering compulsory purchase powers to unlock suitable housing sites

The Cabinet agreed two reports relating to the use of Compulsory Purchase Powers (CPO) to assist with comprehensive redevelopment of sites within Staines – upon - Thames Town Centre. The first of these related to 116 – 120 High Street, which lies adjacent to the Charter Square development currently under construction. The second site was 15 London Road, known as the former Fireworks building, positioned next to the former Centrica site, which has planning permission for a mixed-use development with housing, offices and retail. The Cabinet agreed to the Council's willingness, in principle, to use compulsory purchase and / or appropriation powers in order to enable development of these two sites. It is hoped the resolution by Cabinet will lead to negotiations taking place between the land owners of the various sites but if this is not the case, the Council will look to pursue formal CPO action.

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

Spelthorne published its Part 1 Brownfield Register in December 2018. This identifies all brownfield sites appropriate for residential development. In due course the register will be extended to include relevant sites that have been submitted through Spelthorne's Strategic Land Availability Assessment (SLAA) or appropriate sites which meet the criteria. We will also consider whether any

of the sites will 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.

#### Encouraging the development of small sites and higher site densities

The Council's adopted Core Strategy seeks to encourage high density housing in certain locations under policy HO5. Within Staines Town Centre, development should generally be above 75dph where it is demonstrated that the development complies with the design policy EN1, particularly in terms of its compatibility with the character of the area and is in a location that is accessible by non-car-based modes of travel. With Staines-Upon-Thames, developments have already been approved at over 300 dph (phase 1A - former Majestic House Site). This is currently under construction.

#### Engaging regularly with key stakeholders

The Planning and Enforcement officers hold regular seminars with local resident associations and also planning agents who submit planning applications on a regular basis in Spelthorne. These provide an opportunity to provide advice on the issues facing the borough and of our policies and procedures and to listen to their concerns. One of the concerns related to our procedures on the discharge of planning conditions. We have been working hard to improve the total process and this is on-going. A further concern related to the length of time taken to discharge of contaminated land conditions. The Principal Environmental Health Officer has provided some training to Planning Officers and it is intended that a presentation is made to planning agents at a forthcoming planning seminar followed by a question and answer session to improve information flow.

#### Councillor Training on Planning Issues

Planning officers provide regular training seminars to all councillors. A full programme is delivered to councillors following the elections and regular updates are given throughout their four year terms. In addition, external specialists also provide guidance on particular topics. The training has covered the following areas:

- Planning in the Borough context and the role of the Planning Committee.
- Design in the Planning process
- Affordable housing
- High density/tall buildings
- Planning enforcement and appeals
- How to approach the determination of planning applications and pitfalls
- Green Belt
- Flooding

- Permitted Development and Use Classes Order
- Minerals
- Planning and transportation

#### Planning Officer Training

Planning and Enforcement Officers undertake regular training on planning issues in order to keep abreast of developments. This is, and will, continue to be an on-going and necessary requirement of their posts.

#### Simplifying conditions discharge phased on approved sites, and standardised conditions reviewed

A review of all planning conditions was undertaken in July 2018 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. Council Planning officers have worked with Environmental Health officers to achieve this, particularly with contaminated land, noise and extraction equipment.

#### Ensuring evidence on a particular site is informed by an understanding of viability

The Council's Local Plan requires all proposals of 15 dwellings or more and all sites in excess of 0.5 hectares include to provide 50% affordable housing. Where developments fall short of this requirement, an independent viability would be submitted and assessed on an open book basis. This is a complex area where specialist advice is required and planning officers and councillors have undergone training with further training planned this year.

## **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 organisations to achieve this.

### **Local Plan Progress**

- 4.2 As part of the new Local Plan the Council will seek to boost housing supply and delivery. The new Local Plan will review and update existing policies acting as a barrier to delivery to help development come forward such as densities, design and parking.
- 4.3 The Strategic Land Availability Assessment is a key piece of evidence for the new Local Plan and will be updated annually to ensure that the position on land supply is up to date. The Council is in the process of updating the SLAA for 2019. In line with Planning Practice Guidance, officers are proactively identifying sites, including publicly owned land and brownfield land, for development to ensure that potential supply is exhausted. The Council has an open-ended call for sites on its website whereby landowners or site promoters

can submit potential development sites for consideration in the next iteration of the SLAA.

- 4.4 The SLAA will inform the policies on housing in the new Local Plan and acts as the starting point in determining which sites will be allocated. Moving forward the Council will work with stakeholders to ensure that suitable and available sites come forward at particular points in the plan period.

### **Knowle Green Estates**

- 4.5 The current review of the Council's Local Plan has identified a need to create around 603 housing units each year over the next 15 years. As part of its Issues and Options Consultation in summer 2018, the Council consulted on four main ways to meet this significant requirement for new housing:
- Brownfield development
  - Green belt development
  - Staines development
  - Combination development
- 4.6 Following a Sustainability Appraisal, the professional opinion was that the fourth option (combination) should be taken forward, but with additional safeguards to take account of the public's views on loss of Green Belt. This has been agreed by Cabinet. Within this option, the focus will need to remain very much on realising the considerable latent potential of Staines-upon-Thames (but not to the absolute exclusion of housing development anywhere else in the borough). It is estimated that the five year housing land supply in the Borough is 3204 units. Of the sites identified in the Strategic Land Availability Assessment (SLAA) 2018, over 1,500 units on the identified sites are expected to be delivered in Staines-upon-Thames, with around 1,000 to be delivered on publicly owned sites. In the medium term (6 to 10 years), Publicly-owned sites could deliver another 450 units (with other sites not owned by Spelthorne bringing forward approximately 350).
- 4.7 The preferred approach is to focus on Staines-upon-Thames as the major residential opportunity area. A Masterplan will be developed as part of the new Local Plan which will focus in detail on where and how this new development can best be accommodated, in order to ensure we achieve a sustainable solution for the town.
- 4.8 The Council's landholdings within the town centre (including our recent strategic acquisitions) provide a clear opportunity to bring forward at least 1,420 units in the next 10 years, subject to planning permission. In the next five years, the level of investment that the Council aims to make is likely to be in the region of £300m. As the land owner, Spelthorne Council is confident that this level of residential development can be delivered whilst retaining sufficient car parking to sustain the town centre (though some sites may well be reconfigured to make more efficient use of the Spelthorne Council's land).

- 4.9 The SLAA has identified that, within the town centre, the Council is able to develop the following housing units as a minimum (within the immediate confines of the town centre):

**Table 5 Minimum housing units to be developed by the Council/Knowle Green Estates**

| Site   | Development Type | No. of Units    | Timescale    |
|--|------------------|-----------------|--------------|
| Thameside House                              | Flatted          | 120             | Years 1 - 5  |
| Hanover House and Bridge Street car park     | Flatted          | 75 <sup>1</sup> | Years 1 - 5  |
| Riverside car park (subject to re-provision) | Flatted          | 100             | Years 6 - 10 |
| Elmsleigh Centre and adjoining land          | Flatted          | 650             | Years 6 - 15 |

- 4.10 The Council, as landowner is proposing to submit planning applications for a number of smaller residential developments which are summarised below:

**Table 6 Smaller sites identified to develop by the Council/Knowle Green Estates**

| Site   | Development Type                   | No. of Units | Submission of Planning Application |
|--|------------------------------------|--------------|------------------------------------|
| White House, Kingston Road, Staines          | Flats                              | 28           | End 2021                           |
| White House, Kingston Road, Staines          | Hostel                             | 33           | Received June 2019                 |
| Ceaser Court, Green Street, Sunbury, Phase 2 | Flats                              | 32           | June 2019                          |
| Ashford Multi-Storey Car Park                | Flats                              | 50           | January 2020                       |
| Ashford Hospital Car Park                    | Flats                              | 108          | June 2019                          |
| Harper House, Fordbridge Road                | Short term emergency accommodation | 20           | June 2019                          |

<sup>1</sup> Subject to Council strategy

4.11 Table 11 in Appendix 2 shows, in the final column, possible consequences in 2020 using 2018 results with 2020 thresholds. The consequence is shown to be a housing delivery test below the required 75%, leading to Spelthorne being required to produce an Action Plan. We will also have to apply a 20% buffer to our housing supply and consequently there will be a presumption in favour of sustainable development. However, the table below shows a projection of the number of homes required and the anticipated number of homes delivered by 2020.

**Table 7 Spelthorne – Housing Delivery Test 2021 - Projected**

| No of home required |           |           | Total homes required | No of homes delivered |           |                  | Total homes delivered | HDT Test % | Consequence                            |
|---------------------|-----------|-----------|----------------------|-----------------------|-----------|------------------|-----------------------|------------|--|
| 2017-2018           | 2018-2019 | 2019-2020 |                      | 2017-2018             | 2018-2019 | 2019-2020        |                       |            |  |
| 424                 | 599       | 603       | 1626                 | 221                   | 289       | 286 <sup>2</sup> | 796                   | 49%        | Action Plan + 20% Buffer + Presumption |

<sup>2</sup> Estimated based on average of previous 3 years. Delivery is likely to be higher as over 1,000 units are currently under construction in the Borough. This is considered a minimum.

**Table 8 Improving Decision Making**

| Action   | Service                         | Date           |
|--|---------------------------------|----------------|
| To review the standard planning conditions.  | Planning Development Management | Ongoing        |
| To continue to review the discharge of planning conditions to speed up the process.  | Planning Development Management | Ongoing        |
| To consider imposing a condition providing that development must begin within a shorter timescale than the relevant default period, where this would expedite the development without threatening its deliverability or viability. | Planning Development Management | September 2019 |
| To continue to improve planning performance on speed of decision making.   | Planning Development Management | Ongoing        |
| To continue to improve planning performance on quality of decision making.   | Planning Development Management | Ongoing        |
| To continue to provide ongoing Member training particularly in relation to housing delivery.   | Planning Development Management | Ongoing        |
| To continue to provide on-going planning officer training.   | Planning Development Management | Ongoing        |
| To implement a full programme of Idox measures to facilitate agile / paperless working in DM.  | Planning Development Management | March 2020     |
| To implement a full programme of Enterprise measures for DM staff to manage workloads and performance, improve the use of resources and efficiency / performance.  | Planning Development Management | March 2020     |
| To consider whether to prioritise / fast track housing planning applications   | Planning Development Management | March 2020     |
| To continue to develop and offer a proactive pre-application service to support the delivery of sustainable development.   | Planning Development Management | March 2020     |

**Table 9 Supporting Wider Housing Opportunities**

| Action   | Service            | Date                       |
|--|--------------------|----------------------------|
| To continue dialogue with developers and landowners to build out rates and obtain information on barriers to deliver housing.      | Planning           | On-going                   |
| To work with site promoters and other stakeholders to deliver the Local Plan and allocations.                                      | Strategic Planning | On-going                   |
| To continue to achieve the maximum amount of Affordable Housing.   | Planning           | On-going                   |
| The Council will continue to facilitate the delivery of affordable housing by developing Council owned sites Knowle Green Estates. | Assets             | On-going                   |
| CIL and S106 agreements – To continue to improve processes and improve monitoring.   | Strategic Planning | December 2019 and on-going |

**Next Steps**

- 4.12 The future actions identified will be implemented and monitored over the next year by Planning DM, Strategic Planning, Assets and Housing Strategy. The housing delivery test results will be issued for each authority on a rolling annual basis. If Spelthorne does not meet the test in future years, Housing Delivery Test Action Plans will continue to be produced by Planning Development Management and formally approved by Cabinet.
- 4.13 The actions will be implemented by the responsible service. They will be updated as necessary and new actions will be added in response to any changes in Government policy, legislation and practice guidance.



- 4.14 It is proposed that an annual report will be presented to Cabinet which will advise on the progress of this Action Plan. In the interim, this Action Plan will be reported to the Planning Committee for information.
- 4.15 The Council welcomes any suggestions to improve the delivery of housing in Spelthorne
- 4.16 It is proposed that this plan will be made publicly available on the Council's website.

### Information Document 1

## 1. Planning Policy Context

### The Housing White Paper

- 1.1 The Government published the Housing White Paper 'Fixing our broken market' in February 2017 as a response to the national housing crisis. It set out the Government's plans to reform the housing market and boost the supply of new homes in England. The proposed measures covered planning for the right homes in the right places, how to build homes faster and how to diversify the housing market. Notably, it proposed to hold local authorities to account for the number of new homes delivered through the introduction of a new Housing Delivery Test. The test would show whether the number of homes being built is below the required number of homes needed in that area and would provide a mechanism for establishing the reasons why there has been under delivery.

### Planning for the right homes in the right places: consultation proposals

- 1.2 In September 2017, the Government published the 'Planning for the right homes in the right places: consultation proposals'. This set out proposals to reform the planning system to increase the supply of new homes and increase the local authority capacity to manage growth. The proposals introduced a standard method for calculating local authorities' housing need. The standard method would identify the minimum number of homes expected to be planned for. This proposal marked a departure from previous government policy which required local authorities to prepare a Strategic Housing Market Assessment (SHMA) to identify their housing need figure and the types of housing needed in their area.

### National Policy

- 1.3 The Government reinforced its objective to *significantly boost the supply of new homes* and making the local authority more accountable for delivery in their area by publishing the following:
  - A revised National Planning Policy Framework (NPPF) July 2018, amended in February 2019;
  - The Housing Delivery Test Measurement Rule Book, July 2018;
  - Updated Planning Practice Guidance (PPG), September 2018 amended in February 2019; and
  - The Housing Delivery Test: 2018 Measurement Technical note (February 2019).

- 1.4 The methodology for calculating the Housing Delivery Test is set out in the Housing Delivery Test Measurement Rule Book. It measures the number of net homes delivered against the number of homes required over a rolling three year period.
- 1.5 The Government is, therefore, committed to the improved delivery of more new homes nationally through their economic and housing growth agendas. To this end they have introduced a number of measures and reforms to the planning system intended to deliver more housing, improve housing affordability and remove barriers to development. Local planning authorities (LPAs) are challenged to be more proactive in increasing the speed and quantity of housing supply to meet the identified housing needs of their local area.

#### Local Plan Policy

- 1.6 The current Local Plan for Spelthorne comprises the following documents:
- Core Strategy & Policies DPD (adopted 2009)
  - Allocations DPD (adopted 2009)
  - Six policies from the 2001 Local Plan remain in force and still form part of the Development Plan for Spelthorne
  - South East Plan policy NRM11:Thames Basin Heaths
- 1.7 A replacement local plan is currently being prepared which will be the Spelthorne Local Plan 2020-2035. This Local Plan will set out the Council's vision and objectives for the area and include all development policies and allocations. Consultation on the Issues and Options paper took place in May and June 2018. The Local Development Scheme states that consultation on the Preferred Options following the Issues and Options will commence around October 2019. The final adoption is anticipated to be by the summer of 2021. The programme for preparing the local plan documents is attached as an appendix.
- 1.8 The new Local Plan must allocate sufficient land in appropriate locations for the Council to demonstrate how it will positively meet its housing and employment needs and secure land for infrastructure to support anticipated levels of growth. The Site Selection Methodology - February 2019 demonstrates the Council's approach to identifying suitable sites for development to meet the identified needs set out in the Local Plan.

## Information Document 2

## 2. Housing Delivery Analysis

- 2.1 The Housing Delivery Test (HDT) has been introduced by the Government as a monitoring tool to demonstrate whether local areas are building enough homes to meet their housing need. The HDT, which was originally due to be introduced from November 2018 and was subsequently delayed until February 2019, compares the number of new homes delivered over the previous three years with the authority's housing requirement. In the case of Spelthorne, the housing requirement is the minimum annual local housing need figure (603 dwellings per annum as of February 2019). The calculation is given as:

$$HDT = \frac{\text{Total net homes delivered over a three year period}}{\text{Total number of homes required over three year period}}$$

- 2.2 The HDT will be used to determine the buffer to apply in housing supply assessments and whether the presumption in favour of sustainable development should apply. The National Planning Policy Framework 2018 (NPPF) and National Planning Policy Guidance (NPPG) introduced the 'Housing Delivery Test' (HDT) in a phased approach over three years. Once fully implemented the HDT will have the following consequences:
- Where housing delivery over the previous three years has been less than 95% of the housing requirement, LPAs should prepare an action plan setting out the causes of under delivery and the intended actions to increase delivery;
  - Where delivery has been less than 85% of the housing requirement, a 20% buffer should be applied to the supply of deliverable sites for the purposes of housing delivery assessment;
  - Where delivery has been less than 75% of the housing requirement, the NPPFs presumption in favour of sustainable development will apply. A three year transitional period will operate from February 2019.

2.3 The presumption in favour of sustainable development will apply if the test result is less than:

- 25% in November 2018
- 45% in November 2019
- 75% in November 2020.

2.4 In the first cohort, there were no council's below 25%.

2.5 Spelthorne has been identified (in November 2018 but formally announced in February 2019) as one of the 108 Local authorities where housing delivery over the previous three years has been less than 95% of the housing requirement. In Spelthorne the housing delivery figure is **63%**. This calculation is based on the data set out in Table 10.

**Table 10 Spelthorne – Housing Delivery Test 2019**

| No of home required |           |           | Total homes required | No of homes delivered |           |           | Total homes delivered | HDT Test % | Consequence |
|---------------------|-----------|-----------|----------------------|-----------------------|-----------|-----------|-----------------------|------------|-------------|
| 2015-2017           | 2016-2017 | 2017-2018 |                      | 2015-2016             | 2016-2017 | 2017-2018 |                       |            |             |
| 483                 | 487       | 424       | 1394                 | 308                   | 347       | 221       | 876                   | 63%        | Buffer      |

- 2.6 As a consequence, Spelthorne is required to produce an Action Plan within a period of 6 months, by **19<sup>th</sup> August 2019**.
- 2.7 Spelthorne Borough Council (SBC) is responding to this challenge and has the ambition, recognised across its key strategic documents, to increase and accelerate the delivery of new housing across the district. The allocation of land to accommodate a minimum of 9045 new homes (603 dwellings per annum) is being made through the emerging Local Plan, scheduled for Adoption in 2021.
- 2.8 The NPPF advises that an Action Plan is:
- “A document produced by the local planning authority to reflect challenges and identify actions to address under-delivery against the housing requirement in the area. The document’s purpose is to detail the reasons for under-delivery and the steps the authority intends to take in mitigation and drive up delivery in the area. A good action plan will identify ways to reduce the risk of further under-delivery and set out the case for measures to maintain or improve levels of delivery”.*
- 2.9 The table on the following page sets out the position for all Surrey boroughs and districts. It can be seen that at present seven out of the eleven authorities are required to produce a housing delivery action plan. The final column uses the 2018 results with the 2020 thresholds. The possible consequences are based on the following:
- 95% = Action plan 85%
  - 85% = Action Plan + buffer
  - 75% = Action Plan + buffer + presumption in favour of development

**Table 11 Surrey Local Authorities – Housing Delivery Test 2019**

| Local Authority      | No of homes Required |           |           | Total Homes required | No. of homes delivered |           |           | Total Homes Delivered | HDT Test % | Current Consequence Feb 2019 | Possible consequences in 2020 (using 2018 results with 2020 thresholds) |
|----------------------|----------------------|-----------|-----------|----------------------|------------------------|-----------|-----------|-----------------------|------------|------------------------------|---|
|                      | 2015-2017            | 2016-2017 | 2017-2018 |                      | 2015-2016              | 2016-2017 | 2017-2018 |                       |            |                              |   |
| Elmbridge            | 225                  | 362       | 443       | 1,030                | 240                    | 267       | 130       | 637                   | 62%        | Buffer                       | 75% - Action Plan + Buffer + Presumption                                |
| Epsom and Ewell      | 381                  | 383       | 413       | 1,177                | 159                    | 346       | 162       | 667                   | 57%        | Buffer                       | 75% - Action Plan + Buffer + Presumption                                |
| Guildford            | 521                  | 514       | 551       | 1,585                | 388                    | 501       | 299       | 1,188                 | 75%        | Buffer                       | 85% - Action Plan + Buffer  |
| Mole Valley          | 353                  | 358       | 318       | 1,030                | 158                    | 207       | 423       | 788                   | 77%        | Buffer                       | 85% - Action Plan + Buffer  |
| Reigate and Banstead | 460                  | 460       | 460       | 1,380                | 535                    | 517       | 594       | 1,646                 | 119%       | None                         | No Action   |
| Runnymede            | 401                  | 402       | 394       | 1,197                | 433                    | 152       | 806       | 1,390                 | 116%       | None                         | No Action   |
| Spelthorne           | 483                  | 487       | 424       | 1,394                | 308                    | 347       | 221       | 876                   | 63%        | Buffer                       | 75% - Action Plan + Buffer + Presumption                                |
| Surrey Heath         | 191                  | 198       | 247       | 635                  | 263                    | 221       | 321       | 804                   | 127%       | None                         | No Action   |
| Tandridge            | 425                  | 428       | 464       | 1,317                | 318                    | 222       | 317       | 856                   | 65%        | Buffer                       | 75% - Action Plan + Buffer + Presumption                                |
| Waverley             | 551                  | 553       | 471       | 1,575                | 234                    | 408       | 598       | 1,240                 | 79%        | Buffer                       | 85% - Action Plan + Buffer  |
| Woking               | 245                  | 247       | 217       | 709                  | 326                    | 399       | 358       | 1,083                 | 153%       | None                         | No Action   |



- 2.10 Where there is a presumption in favour of development, the “tilted balance” applies where the balance is skewed in favour of sustainable development and granting planning permission except where the benefits are ‘significantly and demonstrably’ outweighed by the adverse impacts or where specific policies in the National Planning Policy Framework (NPPF) indicate otherwise. The “tilted balance” also applies where there is the absence of relevant up to date development plan policies or where the local authority does not have a five year housing land supply which is presently the case for Spelthorne.

#### Spelthorne’s Current Housing Land Supply Position

- 2.11 The Council’s housing target based on our local housing need is currently 603 dwellings per annum as of February 2019 and this comprises the basis for calculating the five-year supply of deliverable sites. In using the local housing need figure of 603 as the starting point for the calculation of a five year supply, it must be borne in mind that this does not represent a target as it is based on unconstrained need. Through the Local Plan review the Borough’s housing supply will be assessed in light of the Borough’s constraints which will be used to consider options for meeting need. The Council has now published its Strategic Land Availability Assessment 2018 (SLAA) which identifies potential sites for future housing development over the plan period.
- 2.12 The sites identified in the SLAA as being deliverable within the first five years have been used as the basis for a revised 5-year housing land supply figure. Whilst this has shown that notionally we have identified sufficient sites to demonstrate that we have a five year supply of housing sites we now have to apply an additional 20% buffer rather than the previously used 5%. This is because Government guidance (NPPF para 74) requires the application of a 20% buffer “*where there has been significant under delivery of housing over the previous three years*”. We now must have regard to the Local Housing Need figure plus buffer of 724 (603 + 20% buffer) dwellings per annum and, on this basis, the Council has not been able to deliver a sufficient number of dwellings in recent years. It therefore has no choice now but to apply the additional buffer for the five year period from 1 April 2019 to 31 March 2024. The effect of this increased requirement is that the identified sites only represent some 4.4 years supply and accordingly the Council cannot, at present, demonstrate a five year supply of deliverable housing sites.
- 2.13 As a result, current decisions on planning applications for housing development need to be based on the “tilted balance” approach as set out in paragraph 11 of the NPPF (2018) as referred to above.
- 2.14 The need for housing has increased significantly since the adoption of the Core Strategy in 2009. The Council produced a Strategic Housing Market Assessment (SHMA) in 2015 identifying its housing need within the Housing Market Area that it shares with Runnymede. This identified a need for 552-757 dwellings per annum. The Government subsequently issued its ‘Planning for the Right Homes in the Right Places’ consultation in 2017 which set out the housing need for each local planning authority using the standard method. The Government finalised its guidance on the standard method for calculating

housing need in February 2019. Local Housing Need is currently 603 dwellings per annum in Spelthorne and will be used from February 2019 onwards. Table 12 sets out the Borough's net housing completions against its housing requirement.

**Table 12 Local Housing Need & Delivery**

|                  | <b>Completions (net)</b> | <b>Local Housing Need (Min.)</b> | <b>Source</b>      | <b>Shortfall to Min. OAN</b> |
|------------------|--------------------------|----------------------------------|--------------------|------------------------------|
| <b>2013 – 14</b> | 191                      | 166                              | Core Strategy 2009 | +25                          |
| <b>2014 – 15</b> | 265                      | 166                              | Core Strategy 2009 | +99                          |
| <b>2015 – 16</b> | 308                      | 166                              | Core Strategy 2009 | +142                         |
| <b>2016 – 17</b> | 347                      | 552                              | SHMA 2015          | -205                         |
| <b>2017 – 18</b> | 250                      | 552                              | SHMA 2015          | -302                         |
| <b>2018 - 19</b> | 289                      | 590                              | LHN 2018           | -301                         |

### **Five Year Supply Position**

Need 2019/20 = 2024/25 = (5 x 603) = 3015

Buffer at 20% = (3015 x 1.2) = 3618

Annual need including 20% buffer = 724

Projected Supply 2019/20 = 2024/25 = 3204

**Housing supply (3094 / 708) = 4.4 years of supply or 88%**

### Spelthorne's Housing Performance

- 2.15 A large proportion of the existing housing stock was built between 1920 and 1970. A very high proportion is owner-occupied and comprises mainly detached, semi-detached and terraced housing. The 2011 Census indicates that approximately 12% of the stock is social housing managed by Registered Social Landlords (RSLs) with a similar amount of private rented accommodation. Some 3.5% of the stock is vacant. The Housing completions (net) by sector April 2009-March 2018 is set out in Appendix 4 Table 21.

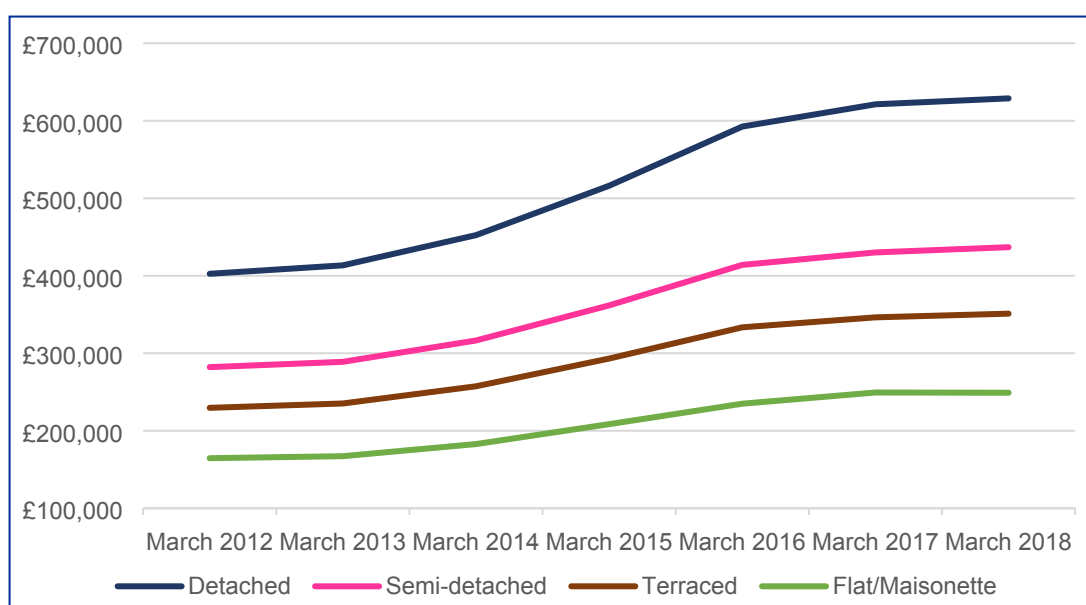
- 2.16 House prices have continued to fluctuate. Table 13 and Figure 1 illustrate changes in annual average (median) house prices over the last ten years according to latest available data. Data on house prices is derived from actual sale prices which can show significant variation over time, particularly when the total volume of sales is small. The information should therefore be seen only as a guide to relative movement in house prices by type.
- 2.17 All affordable housing for rent is managed by RSLs and for each scheme granted planning permission the Council initially has 100% nomination rights for first lets with 75% thereafter. One important contextual indicator relating to the achievement of affordable housing policies is the size and composition of the Housing Register. Since 2009 the Council has operated a Choice Based Lettings scheme which significantly extends the opportunities for families on the Housing Register.

**Table 13 Average House Prices in Spelthorne by type of dwelling**

| Year                      | Type of Dwelling |               |            |                 |
|---------------------------|------------------|---------------|------------|-----------------|
|                           | Detached         | Semi-detached | Terraced   | Flat/Maisonette |
| March 2012                | £402,564         | £282,092      | £229,587   | £164,599        |
| March 2013                | £413,453         | £288,940      | £235,190   | £167,183        |
| March 2014                | £452,436         | £316,491      | £257,380   | £182,821        |
| March 2015                | £516,173         | £361,784      | £293,173   | £208,525        |
| March 2016                | £592,566         | £414,053      | £333,480   | £234,909        |
| March 2017                | £621,268         | £430,119      | £346,341   | £249,377        |
| March 2018                | £628,911         | £436,892      | £351,105   | £249,039        |
| <b>% change 2012-2018</b> | <b>56%</b>       | <b>55%</b>    | <b>53%</b> | <b>51%</b>      |

Source: <http://landregistry.data.gov.uk/app/ukhpi/explore>

**Figure 1 Average annual house prices in Spelthorne by type of dwelling**



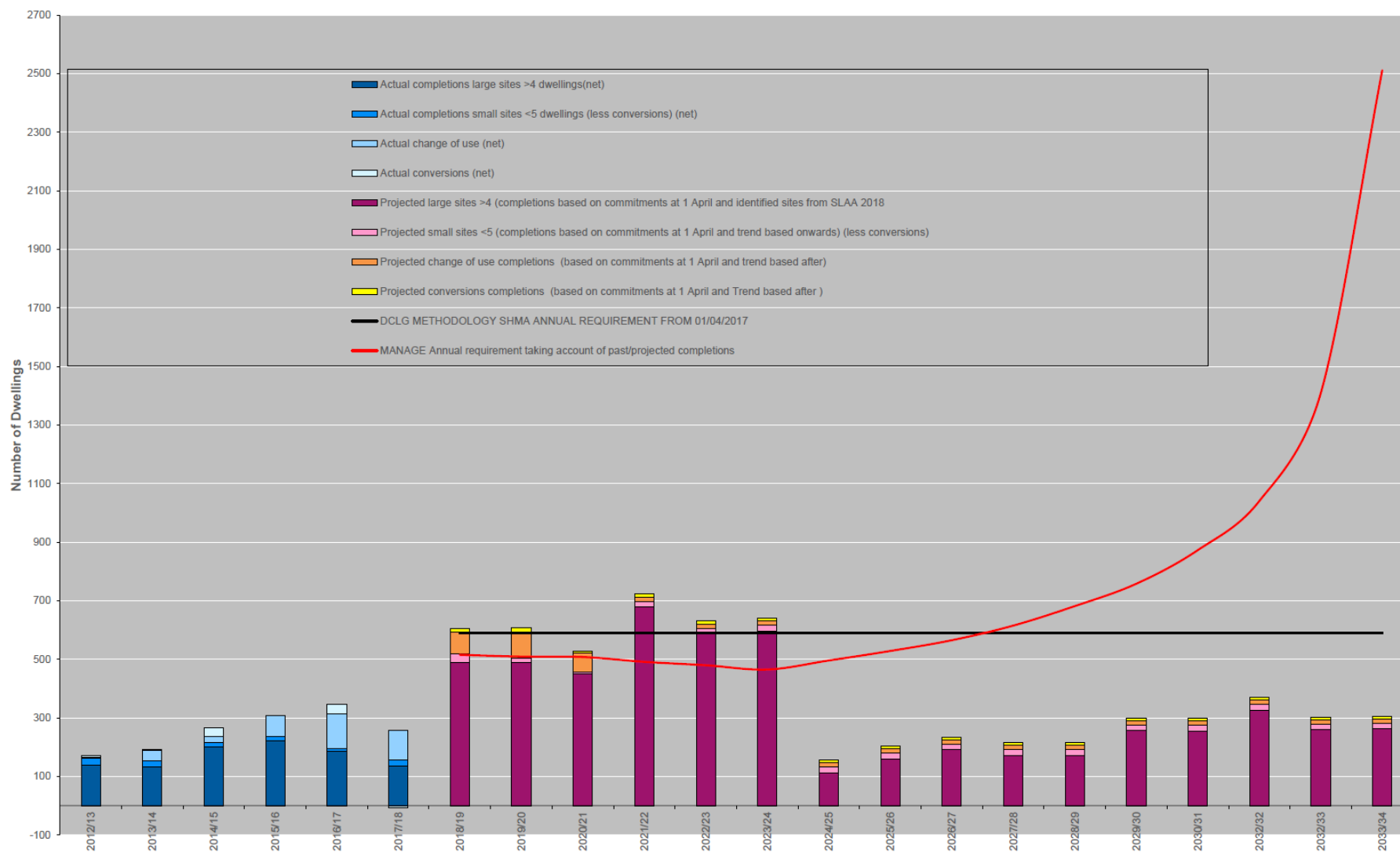
## **Projecting future provision**

- 2.18 The housing trajectory (Table 14 and Figure 2) shows housing completions for the last seven years and anticipated delivery for the next 15 years to 2034. It combines information on past completions, existing planning permissions and identified housing sites from the Strategic Land Availability Assessment 2018 to illustrate projected housing supply going forward into the new Local Plan period.
- 2.19 Net completions for the previous seven years (including the reporting year) are recorded and broken down into four categories – conversions, change of use, small sites with fewer than 5 dwellings (net) and large sites of 5 or more dwellings (net). Data on housing completions by bedroom are set out in Table 16. Data for projected completions in future years is recorded on the same basis in Table 14.

**Table 14 Draft Housing Trajectory Data 2018-2034**

|   | 2012/13 | 2013/14 | 2014/15 | 2015/16 | 2016/17 | 2017/18 | 2018/19 | 2019/20 | 2020/21 | 2021/22 | 2022/23 | 2023/24 | 2024/25 | 2025/26 | 2026/27 | 2027/28 | 2028/29 | 2029/30 | 2030/31 | 2032/32 | 2032/33 | 2033/34 |
|---|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|
| Actual Total completions (gross)  | 222     | 198     | 333     | 355     | 374     | 287     |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |
| Actual Total completions (net)  | 170     | 191     | 265     | 308     | 347     | 250     | 0       | 0       | 0       | 0       | 0       | 0       | 0       | 0       | 0       | 0       | 0       | 0       | 0       | 0       | 0       | 0       |
| Actual conversions (net)  | 6       | 2       | 29      | 1       | 34      | -8      |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |
| Actual change of use (net)  | 1       | 37      | 20      | 71      | 118     | 102     |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |
| Actual completions small sites <5 dwellings (less conversions) (net)  | 24      | 20      | 14      | 14      | 8       | 22      |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |
| Actual completions large sites >4 dwellings(net)  | 139     | 132     | 202     | 222     | 187     | 134     |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |
| Annual Losses   | 52      | 7       | 68      | 47      | 27      | 37      | 49      |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |
| Under Construction at previous Year End (gross)   | 303     | 295     | 359     | 413     | 439     | 476     | 1010    |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |
| Difference between u/c and comps in each year   | 81      | 97      | 26      | 58      | 65      | 189     |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |
| Completions as a percentage of U/C  | 73.27   | 67.12   | 92.76   | 85.96   | 85.19   | 60.29   |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |         |
| Projected annual completions (net) all sources  |         |         |         |         |         |         | 606     | 607     | 529     | 722     | 630     | 640     | 157     | 203     | 235     | 215     | 216     | 300     | 299     | 370     | 303     | 306     |
| Projected conversions completions (based on commitments at 1 April and Trend based after )                        |         |         |         |         |         |         | 14      | 13      | 8       | 9       | 9       | 9       | 9       | 9       | 9       | 9       | 9       | 9       | 9       | 9       | 9       | 9       |
| Projected change of use completions (based on commitments at 1 April and trend based after)                       |         |         |         |         |         |         | 74      | 91      | 66      | 15      | 15      | 15      | 15      | 15      | 15      | 15      | 15      | 15      | 15      | 15      | 15      | 15      |
| Projected small sites <5 (completions based on commitments at 1 April and trend based onwards) (less conversions) |         |         |         |         |         |         | 29      | 15      | 5       | 20      | 20      | 20      | 20      | 20      | 20      | 20      | 20      | 20      | 20      | 20      | 20      | 20      |
| Projected large sites >4 (completions based on commitments at 1 April and identified sites from SLAA 2018         |         |         |         |         |         |         | 488     | 489     | 450     | 678     | 586     | 596     | 113     | 159     | 191     | 171     | 172     | 256     | 255     | 326     | 259     | 262     |
| DCLG METHODOLOGY SHMA ANNUAL REQUIREMENT FROM 01/04/2017  |         |         |         |         |         |         | 590     | 590     | 590     | 590     | 590     | 590     | 590     | 590     | 590     | 590     | 590     | 590     | 590     | 590     | 590     | 590     |
| MANAGE Annual requirement taking account of past/projected completions  |         |         |         |         |         |         | 515     | 509     | 508     | 491     | 480     | 465     | 496     | 528     | 565     | 615     | 682     | 758     | 873     | 1040    | 1409    | 2511    |
| SLAA TOTALS (Sites >4)  |         |         |         |         |         |         |         | 161     | 285     | 595     | 503     | 596     | 113     | 159     | 191     | 171     | 172     | 256     | 255     | 326     | 259     | 262     |

**Figure 2 Draft Housing Trajectory 2018-2034**



- 2.20 Anticipated completions for the year 2019/20 are based on the assumption that 60% of the 1,094 units under construction at the start of the year in Table 15 will be completed during the year. The remaining 40% would be completed over the next two years with 30% in year 2 and 10% in year 3. This is to allow time for dwellings on large sites to be completed and to ensure that regard is had to past performance so that the likely number of completions in the current year is not overestimated.
- 2.21 For the period from 2019/20 to 2033/34 the estimated net annual completions are based on the following components:
- Dwellings under construction (those not completed in 2018/19)
  - Dwellings with planning permission (unimplemented)
  - Estimates for dwellings provided by conversions, change of use and from small sites (fewer than 5 units net)
  - Sites of 5 or more dwellings identified in the SLAA 2018.
- 2.22 Given the past trends in the Borough's implementation rates of planning permissions, it has been assumed that most remaining unimplemented permissions will be completed over the next four year period from 2019. However, a small non-implementation factor of 5% has been applied on a precautionary basis to allow for permissions which expire.
- 2.23 The third component above, (estimates,) comprises three elements. The first, dwellings from conversions, is calculated from the average annual net provision over seven years for the conversion of existing residential development to smaller units, such as a single dwelling house converted to flats. The second element derives from the change of use from non-residential property to residential, such as a shop to a dwelling. Again the estimate is based on the annual average net provision over a seven year period. Traditionally this was always a small component of the overall total. However, the increase in large office to residential conversions as a consequence of the Government's relaxation of planning controls has significantly expanded this source of supply. It is not known how long this trend will continue, so whilst the trajectory takes account of known schemes, the longer term estimate for this source of dwelling supply remains cautious (less than 10 units per annum). Further work on this element is currently underway.
- 2.24 The third element relates to new build dwellings on sites delivering fewer than five dwellings (net). This is the threshold for sites considered to be too small to be reliably identified in the SLAA. Currently there is no evidence from completions data to suggest that this source of new housing is likely to decline over the plan period and the estimate of 20 units per annum based on the average annual net figure for the last seven years is included in the trajectory with no discount applied.
- 2.25 The fourth and final component of supply is that provided by the SLAA 2018. Every site of 5 or more dwellings listed in the study is assessed on a likely date

implementation based on the criteria of whether a site is developable and deliverable over the plan period broken down into three five year periods.

- 2.26 The data is illustrated in graphical form in Figure 2 showing by means of the columns, the actual and forecast completion rates. The trajectory illustrates the effect of taking into account the latest objectively assessed housing need figures published in the Government's proposed methodology. The horizontal black line therefore shows the requirement of 590 per annum. It shows that, given the current level of completions forecast for the plan period, the overall number of dwellings for the remainder of the plan period based on 590 will not be achieved. The red line shows the effect of completions each year on the overall plan requirement taking account of the dwellings completed each year to provide a residual figure. The need to review the Local Plan remains paramount.
- 2.27 It should be noted however that the Objectively Assessed Need (OAN) figure is untested and is not automatically a proxy for a final housing requirement in a Local Plan. The Council will have to consider the evidence carefully and take into account whether environmental and policy constraints, such as Green Belt, will have an impact on the final housing requirement. The OAN figure should not therefore be confused with a plan target. The number of dwellings completed, under construction and with outstanding planning permission at 31 March 2019 is shown in Table 15.

**Table 15 Number of dwellings completed, under construction and with outstanding planning permission at 31 March 2019**

|   | Conversion/ Change of Use | Small sites (less than 0.4ha) | Large sites (0.4ha or greater) | Total dwellings – all sites |
|---|---------------------------|-------------------------------|--------------------------------|-----------------------------|
| Gross Completions (2018-2019)                     | 157                       | 99                            | 54                             | 310                         |
| Losses (2018-2019)                                | 9                         | 12                            | 4                              | 21                          |
| <b>Net Completions</b>                            | <b>148</b>                | <b>87</b>                     | <b>54</b>                      | <b>289</b>                  |
| Units under construction                          | 170                       | 246                           | 678                            | 1094                        |
| Units not started on sites under construction     | 0                         | 0                             | 0                              | 0                           |
| Units with outstanding planning permissions (net) | 313                       | 198                           | 551                            | 1062                        |
| Units pending Section 106 agreement (net)*        | 0                         | 5                             | 160                            | 165                         |
| <b>Total units outstanding</b>                    | <b>483</b>                | <b>449</b>                    | <b>1,389</b>                   | <b>2,321</b>                |

(Source: In house monitoring)

\*This figure includes all sites pending S106 agreements which have not been concluded or formally withdrawn.



**Table 16 Housing completions (net) by bedroom April 2009-March 2019**

| Year                 | Total Dwellings (Gross) |              |            |            |              | Losses (ii) |            |            |           |            | Net Completions |              |            |            |              | Running Total |
|----------------------|-------------------------|--------------|------------|------------|--------------|-------------|------------|------------|-----------|------------|-----------------|--------------|------------|------------|--------------|---------------|
|                      | 1 bed                   | 2 bed        | 3 bed      | 4 bed      | Total        | 1 bed       | 2 bed      | 3 bed      | 4 bed     | Total      | 1 bed           | 2 bed        | 3 bed      | 4 bed      | Total        |               |
| 2009-2010            | 77                      | 166          | 26         | 27         | 296          | 2           | 36         | 43         | 4         | 85         | 75              | 130          | -17        | 23         | 211          | <b>211</b>    |
| 2010-2011            | 70                      | 112          | 19         | 11         | 212          | 3           | 21         | 43         | 6         | 73         | 67              | 91           | -24        | 5          | 139          | <b>350</b>    |
| 2011-2012            | 53                      | 91           | 90         | 28         | 262          | 3           | 43         | 52         | 5         | 103        | 50              | 48           | 38         | 23         | 159          | <b>509</b>    |
| 2012-2013            | 66                      | 98           | 38         | 20         | 222          | 2           | 6          | 42         | 2         | 52         | 64              | 92           | -4         | 18         | 170          | <b>679</b>    |
| 2013-2014            | 66                      | 98           | 19         | 15         | 198          | 2           | 2          | 1          | 2         | 7          | 64              | 96           | 18         | 13         | 191          | <b>870</b>    |
| 2014-2015            | 79                      | 172          | 48         | 34         | 333          | 42          | 8          | 8          | 10        | 68         | 37              | 164          | 40         | 24         | 265          | <b>1,135</b>  |
| 2015-2016            | 89                      | 166          | 71         | 29         | 355          | 2           | 6          | 31         | 8         | 47         | 87              | 160          | 40         | 21         | 308          | <b>1,443</b>  |
| 2016-2017            | 98                      | 189          | 50         | 37         | 374          | 6           | 11         | 8          | 2         | 27         | 92              | 178          | 42         | 35         | 347          | <b>1,790</b>  |
| 2017-2018            | 108                     | 111          | 36         | 32         | 287          | 8           | 12         | 6          | 11        | 37         | 100             | 99           | 30         | 21         | 250          | <b>2,040</b>  |
| 2018-2019            | 164                     | 92           | 33         | 21         | 310          | 3           | 4          | 8          | 6         | 21         | 161             | 88           | 25         | 15         | 289          | <b>2,329</b>  |
| <b>2009-2019 (i)</b> | <b>870</b>              | <b>1,295</b> | <b>430</b> | <b>254</b> | <b>2,849</b> | <b>73</b>   | <b>149</b> | <b>242</b> | <b>56</b> | <b>520</b> | <b>797</b>      | <b>1,146</b> | <b>188</b> | <b>198</b> | <b>2,329</b> |               |

(i) Period covered by the Spelthorne Core Strategy and Policies DPD.

(ii) Losses of residential units (through redevelopment, conversion and to other uses) are accounted for in the year in which a development is commenced on the site.

## Density

- 2.28 From 2009 to 2018 the average density for all completed schemes was 54 dwellings per hectare. It is inevitable that many small sites will fall below the preferred minimum density guideline of 35 dwellings per hectare (dph) set out in Policy HO5. However, the majority of completions have been built at more than 35dph and the number of dwellings completed at densities above 75 dph represents 44% of all completions in the year, a notable increase from last year's figure – see Table 17.

**Table 17 Percentage of new dwellings on completed sites between 2009 and 2018 at different density ranges.**

| Year         | Sites completed in year | Number of dwellings on completed sites | Average density of completed sites | % of dwellings completed at different density ranges |       |     |
|--------------|-------------------------|--|------------------------------------|--|-------|-----|
|              |                         |  |                                    | <35  | 35-75 | >75 |
| 2009-2010    | 40                      | 235                                    | 63                                 | 3%   | 67%   | 30% |
| 2010-2011    | 38                      | 272                                    | 64                                 | 7%   | 52%   | 41% |
| 2011-2012    | 33                      | 260                                    | 39                                 | 7%   | 89%   | 4%  |
| 2012-2013    | 38                      | 146                                    | 44                                 | 18%  | 42%   | 40% |
| 2013-2014    | 27                      | 242                                    | 55                                 | 6%   | 44%   | 50% |
| 2014-2015    | 42                      | 307                                    | 65                                 | 18%  | 11%   | 71% |
| 2015-2016    | 28                      | 176                                    | 76                                 | 6%   | 42%   | 52% |
| 2016-2017    | 46                      | 440                                    | 51                                 | 19%  | 55%   | 26% |
| 2017-2018    | 44                      | 296                                    | 50                                 | 29%  | 27%   | 44% |
| <b>Total</b> | <b>336</b>              | <b>2,374</b>                           | <b>54</b>                          |  |       |     |

Source: In house monitoring

## Affordable housing

- 2.29 The overall provision of affordable housing has declined in recent years (Table 18). Schemes granted planning permission in 2018-2019 year have included a significantly lower proportion of affordable housing (Table 19). A complete schedule of housing completions by sector between April 2009-March 2018 which shows the number of private and affordable units is contained in Appendix 4 Table 21. There is an increasing trend for developers to seek to reduce on-site provision of affordable housing on the grounds of viability and /or to promote off-site provision or an in-lieu financial contribution. A number of larger schemes have recently been granted planning permission with significantly lower proportions of on-site provision than Policy HO3 seeks to achieve. In addition, the conversion of offices to residential under the “prior approval” regime has prevented the negotiation of affordable housing in a significant number of schemes.

2.30 Some £3.9m was been received in 2014/15 and 2017/18 in contributions in lieu of on-site affordable provision. The effectiveness of financial contributions in lieu of on-site provision will need to be closely monitored in the future to ensure that opportunities to increase the supply of affordable housing are maximised. A total of £1m was spent on the Crooked Billet development which secured all 29 units as affordable housing (incl. 9 units secured under the planning permission). In addition there a number of Council projects in the pipeline which will be partly funded from S106 money and these are referred to under the Action Plan Context and Action Plan below.

**Table 18 Number of affordable homes provided per year since 2009**

| Year         | Affordable dwellings completed (gross) | Affordable dwellings lost in year | Affordable dwellings completed (net) | Rent        |            | Shared Ownership |            | Other/not specified |          |
|--------------|--|-----------------------------------|--------------------------------------|-------------|------------|------------------|------------|---------------------|----------|
|              |  |                                   |                                      | Gross units | %          | Gross units      | %          | Gross units         | %        |
| 2009-10      | 99                                     | 54                                | 45                                   | 64          | 65         | 35               | 35         | 0                   | 0        |
| 2010-11      | 96                                     | 44                                | 52                                   | 84          | 87         | 12               | 13         | 0                   | 0        |
| 2011-12      | 144                                    | 59                                | 85                                   | 101         | 70         | 43               | 30         | 0                   | 0        |
| 2012-13      | 63                                     | 20                                | 43                                   | 51          | 81         | 12               | 19         | 0                   | 0        |
| 2013-14      | 44                                     | 0                                 | 44                                   | 44          | 100        | 0                | 0          | 0                   | 0        |
| 2014-15      | 16                                     | 43                                | -27                                  | 8           | 50         | 8                | 50         | 0                   | 0        |
| 2015-16      | 138                                    | 14                                | 124                                  | 82          | 59         | 56               | 41         | 0                   | 0        |
| 2016-17      | 46                                     | 0                                 | 46                                   | 46          | 100        | 0                | 0          | 0                   | 0        |
| 2017-18      | 9                                      | 0                                 | 9                                    | 5           | 55.5       | 4                | 44.5       | 0                   | 0        |
| 2018-19      | 6                                      | 0                                 | 6                                    | 6           | 100        | 0                | 0          | 0                   | 0        |
| <b>Total</b> | <b>661</b>                             | <b>234</b>                        | <b>427</b>                           | <b>491</b>  | <b>77%</b> | <b>170</b>       | <b>23%</b> | <b>0</b>            | <b>0</b> |

Source: In house monitoring

**Table 19 Affordable dwellings granted planning permission 2018-2019**

|  | <b>Number of sites</b> | <b>Total Dwellings (gross)</b> | <b>Affordable dwellings granted pp</b> | <b>Affordable dwellings as % of all dwellings granted pp</b> |
|--|------------------------|--------------------------------|--|--|
| All schemes  | 69                     | 998                            | 47                                     | 4.7%   |
| Schemes above 15 unit threshold as defined in Policy HO3 | 12                     | 812                            | 47                                     | 5.7%   |

Source: In house monitoring

- 2.31 The conversion of offices to residential under the “prior approval” regime has prevented the negotiation of affordable housing in a significant number of schemes. In the year to 31 March 2019, 12 applications for prior approval were granted, involving the loss of office floorspace with the provision of 256 dwellings, an increase from 161 dwellings in 2018 but with no affordable housing (Table 20).

**Table 20 Prior approval applications granted April 2018-March 2019**

| Application No | Address   | Date Approved | Number of dwellings                               | Commenced |
|----------------|---|---------------|---|-----------|
| 18/00606/PDR   | 70 Church Road, Ashford                                       | 20/06/18      | 2x1 bed flats                                     | Oct 2018  |
| 18/00739/PDR   | 20-22 High Street, Staines                                    | 17/07/18      | 1x1 bed flat                                      |           |
| 18/00995/PDO   | 5-7 Clarence Street, Staines                                  | 22/08/18      | 5x1 bed flats                                     |           |
| 18/00993/PDO   | 4 Church Street, Staines                                      | 21/08/18      | 2x1 bed flats                                     |           |
| 18/01004/PDO   | Units 3 & 4, The Summit Business Park, Hanworth Road, Sunbury | 07/09/18      | 51x1 bed flats<br>45x2 bed flats<br>4x3 bed flats |           |
| 18/01136/PDO   | Strata Technology Ltd, Strata House, Batavia Road, Sunbury    | 01/10/18      | 12x1 bed flats                                    |           |
| 18/01267/PDO   | West Wing, Council Offices, Knowle Green, Staines             | 17/10/18      | 8x1 bed flats<br>13x2 bed flats<br>4x3 bed flats  |           |
| 18/01655/PDR   | 115 Feltham Road, Ashford                                     | 22/01/19      | 2x1 bed flats                                     |           |
| 18/01672/PDO   | Heliting House, 5-16 London Road, Staines                     | 31/01/19      | 47x1 bed flats<br>6x2 bed flats                   |           |
| 18/01749/PDO   | 61-63 High Street, Staines                                    | 12/02/19      | 3x1 bed flats<br>2x2 bed flats                    |           |
| 19/00102/PDO   | HM Revenue & Customs, Forum House, 14 Thames Street, Staines  | 27/02/19      | 35x1 bed flats<br>5x2 bed flats                   |           |
| 19/00063/PDO   | 6-8 Wolsey Road, Ashford                                      | 18/03/19      | 7x1 bed flats<br>2x2 bed flats                    |           |

### The Brownfield Land Register

- 2.32 The National Planning Policy Framework (NPPF) requires councils to encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value. All sites included on the register have been provisionally assessed as meeting the NPPF definition of previously developed land.

2.33 To be included, sites must also meet the following:

- at least 0.25 hectares in size or capable of supporting at least five dwellings;
- "suitable" for residential development;
- the land is "available" for residential development; and
- residential development of the land is "achievable".

2.34 Spelthorne published its Part 1 Brownfield Register in December 2018. The Register provides up-to-date and consistent information on sites that are considered to be appropriate for residential development as long as they meet the criteria set out in Town and Country Planning (Brownfield Land Registry) Regulations 2017. Registers are in two parts, Part 1 comprises all brownfield sites appropriate for residential development and Part 2 those sites granted permission in principle.

2.35 The Part 1 Brownfield Land Register includes sites that have planning permission, or are allocations in the adopted Local Plan. In due course the register will be extended to include relevant sites that have been submitted through Spelthorne's Strategic Land Availability Assessment (SLAA) or appropriate sites which meet the criteria.

2.36 The Brownfield Land Register does not affect the status of sites that already have planning permission or are allocated in the adopted Local Plan for development. The inclusion of other sites on the register does not give them any formal status, or grant permission in principle, or in any sense infer that planning permission will be granted for development. The Brownfield Land Register will be subject to periodic review and through ongoing refinement further sites will be added whilst others may be removed.

### The New Local Plan

2.37 The current review of the Council's Local Plan has identified a need to create around 603 housing units each year over the next 15 years. As part of its Issues and Options Consultation in the summer 2018, the Council consulted on four main ways to meet this significant requirement for new housing beyond those sites already identified in the SLAA:

- Brownfield development
- Green belt development
- Staines development
- Combination development

2.38 Following a Sustainability Appraisal and in light of the consultation outcome, the professional opinion was that the fourth option (combination) should be

taken forward, but with additional safeguards to take account of the public's views on loss of Green Belt. This was agreed by Cabinet in September 2018. Within this option, the focus will need to remain very much on realising the considerable latent potential of Staines-upon-Thames (but not to the absolute exclusion of housing development anywhere else in the borough).

- 2.39 The preferred approach is to focus on Staines-upon-Thames as the major residential opportunity area. A Masterplan will then be developed as part of the new Local Plan which will focus in detail on where and how this new development can best be accommodated, in order to ensure we achieve a sustainable solution for the town.

### Information Document 3

### 3. Key challenges

Increasing numbers on the Housing Register: Over the past three years, the number of applicants on the Council's Housing Register has grown by 79%.

Lack of availability of existing affordable housing: In 2017/18 there were eleven applicants for every social housing vacancy.

High rates of statutory homelessness: There is an average of 116 households for whom we have a duty to provide accommodation per year, with one in five households approaching us due to the termination of a private sector tenancy.

High use of emergency and temporary housing for homeless households: The average occupancy of temporary accommodation at the end of each quarter in the four years to 2017/18 was 111 households. See Appendix 3 Table H4. For example, the average cost to the Council to accommodate one homeless household in emergency housing is approximately £6,500 per annum

Increasing affordability issues: ratio of the median house price to the median wage in the area evidences a year-on-year rise over the past four years, with Spelthorne outpacing the ratios for both the South East and England.

Lack of new-build affordable housing: The net increase of provision over the past four years has been just 152 units – an average of 38 per year.

- 3.1 The Capital Strategy also identifies the following issues affecting the housing market in Spelthorne.

#### The effect of our proximity to London

As well as the evident demand for affordable housing from local residents, there is also considerable pressure from London. The cost of housing in London is even higher than in Spelthorne, and London boroughs are actively placing homeless households from their boroughs into Spelthorne, as well as 'block booking' emergency accommodation facilities within Spelthorne for their homeless people, placing further demand on the already strained private sector.

#### Heathrow expansion

Another key issue that will have a significant impact on our community is the proposed third runway at Heathrow airport and the major expansion of works which are planned for Heathrow. Work on various parts of the airport and the surrounding infrastructure is likely to go on for a minimum of nine years. This will introduce further pressure as people working on the Heathrow expansion seek to be housed close to their workplace.



### Key worker accommodation

Whilst housing affordability is a significant issue in general, it acutely affects key workers, who help to run the essential local services such as schools, hospitals, doctor's surgeries and fire stations. According to Government statistics released in 2016, the latest records available, the mean income for employed households within Spelthorne is £33,500. However, the starting salaries for essential local workers is much less. We know anecdotally that key worker staff are moving further and further away from Spelthorne 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 Spelthorne is availability of affordable housing. The Council is seeking to tackle this through our housing company Knowle Green Estates Ltd and look at opportunities within allocated sites for the new Local Plan.

### 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 Spelthorne Council 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 a period of time because of the rental income which it generates. However, the Council needs to be in a position to forward fund such developments and the cost of finance for the acquisition, development and construction stages is prohibitive for councils 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 cash flow to deliver.

### Engagement with Stakeholders

The Spelthorne Issues and Options Consultation Paper took place in May and June 2018 and the consultation response document has been published. A large range of stakeholders were engaged as part of the consultation process including landowners, developers, utility providers and statutory consultees. The Local Development Scheme timetable shows the next stage of consultation on preferred options is anticipated to take place during October and November 2019 with a final round of consultation expected to take place in summer 2020.

Alongside the Issues and Options consultation paper a number of pieces of evidence were published including the Green Belt Assessment Stage one. The Strategic Planning Team met with a significant number of landowners ahead of the publication of this document to make them aware of the key findings related to their site. The team will continue to engage with all stakeholders throughout the production of the Local Plan, including regular contact with landowners and

their agents to ensure the sites that will be allocated will be delivered when anticipated.

#### Rail access to Heathrow

To date, the government is advancing two new major rail schemes (Western Rail to Heathrow and Southern Rail to Heathrow) to significantly transform rail access to and from Heathrow. The government plans to partly involve the private sector in its financing, delivery and maintenance. It aims to improve access to Heathrow from the south, reduce rail journey times, ease road and passenger congestion, create additional connections, generate economic growth and new jobs and provide an alternative form of transport for passengers, especially people who travel to the airport by car.

Alternatively, the Council has submitted a £375m light rail scheme to Heathrow to the Department of Transport (DfT) as part of its call for ideas on third party funded projects.

## Appendix 4

**Table 21 Housing completions (net) by sector April 2009-March 2018**

|                     | Total Dwellings (Gross) |            |          |              | Losses (ii) |            |          |            | Net Completions |            |          |              |               |
|---------------------|-------------------------|------------|----------|--------------|-------------|------------|----------|------------|-----------------|------------|----------|--------------|---------------|
| Year (Apr-Mar)      | Private                 | RSL        | Public   | Total        | Private     | RSL        | Public   | Total      | Private         | RSL        | Public   | Total        | Running Total |
| 2009-2010           | 197                     | 99         | 0        | 296          | 29          | 56         | 0        | 85         | 168             | 43         | 0        | 211          | 211           |
| 2010-2011           | 116                     | 96         | 0        | 212          | 29          | 44         | 0        | 73         | 87              | 52         | 0        | 139          | 350           |
| 2011-2012           | 118                     | 144        | 0        | 262          | 43          | 60         | 0        | 103        | 75              | 84         | 0        | 159          | 509           |
| 2012-2013           | 159                     | 63         | 0        | 222          | 32          | 20         | 0        | 52         | 127             | 43         | 0        | 170          | 679           |
| 2013-2014           | 154                     | 44         | 0        | 198          | 7           | 0          | 0        | 7          | 147             | 44         | 0        | 191          | 870           |
| 2014-2015           | 317                     | 16         | 0        | 333          | 25          | 43         | 0        | 68         | 292             | -27        | 0        | 265          | 1,135         |
| 2015-2016           | 217                     | 138        | 0        | 355          | 33          | 14         | 0        | 47         | 184             | 124        | 0        | 308          | 1,443         |
| 2016-2017           | 328                     | 46         | 0        | 374          | 27          | 0          | 0        | 27         | 301             | 46         | 0        | 347          | 1,790         |
| 2017-2018           | 278                     | 9          | 0        | 287          | 37          | 0          | 0        | 37         | 241             | 9          | 0        | 250          | 2,040         |
| <b>2009-2018(i)</b> | <b>1,884</b>            | <b>655</b> | <b>0</b> | <b>2,539</b> | <b>262</b>  | <b>237</b> | <b>0</b> | <b>499</b> | <b>1,622</b>    | <b>418</b> | <b>0</b> | <b>2,040</b> |               |

(i) Period covered by the Spelthorne Core Strategy and Policies DPD.

(ii) Losses of residential units (through redevelopment, conversion and to other uses) are accounted for in the year in which a development is commenced on the site.

## Appendix 5

**Table 22 Sites under construction at 31 March 2019**

| Application No | PA Type | Address  | Date PP granted | Scheme Gross Total | Scheme Net Total | Date commenced | Number of units completed to date | Comment  |
|----------------|---------|--|-----------------|--------------------|------------------|----------------|-----------------------------------|--|
| 14/01347       | FUL     | Sunlink One,<br>1-3 Station Road<br>Sunbury                | 24/11/14        | 33                 | 33               | Nov-15         | 0                                 | March 2019: Site still under construction.                                 |
| 15/01498       | FUL     | 430 Staines Road West<br>Ashford                           | 04/01/16        | 6                  | 5                | Aug-18         | 0                                 | No response received.  |
| 16/00196       | FUL     | Land to r/o Imtech House, 33-35 Woodthorpe Road<br>Ashford | 07/06/16        | 26                 | 26               | Nov-17         | 0                                 | June 2019 – Development is close to completion. No delays to construction. |

| Application No | PA Type | Address   | Date PP granted | Scheme Gross Total | Scheme Net Total | Date commenced | Number of units completed to date | Comment   |
|----------------|---------|---|-----------------|--------------------|------------------|----------------|-----------------------------------|---|
| 09/00566       | OUT     | Former Majestic House site (Charter Square Phase I) High St Staines | 07/06/16        | 260                | 260              | Sep-17         | 0                                 | June 2019: Site under construction. Work is well advanced on Phase 1A with the delivery of 260 residential units and commercial space scheduled for completion in Spring 2020.  |
| 16/01130       | FUL     | Shapla Restaurant Russell Rd Shepperton                             | 07/10/16        | 5                  | 4                | Feb-19         | 0                                 | May 2019: Anticipated completion: end of October 2019. Building was delayed initially due to change in build loan provider and exploring the potential of a bigger build. Increased delays due to response times by the Council. Actions the Council could take to speed up delivery of housing: Apply consideration to improving efficiency (unspecified). (Officer note: applications to discharge conditions and CIL paperwork initially incomplete but have now been resolved). |

| Application No | PA Type | Address   | Date PP granted | Scheme Gross Total | Scheme Net Total | Date commenced | Number of units completed to date | Comment  |
|----------------|---------|---|-----------------|--------------------|------------------|----------------|-----------------------------------|--|
| 17/00353       | FUL     | HSBC, 47-49 (2nd floor) Church Rd Ashford                           | 03/07/17        | 8                  | 6                | Mar-18         | 0                                 | May 2019: Site still under construction. Anticipated completion date: Sept/Oct 2019  |
| 17/01028       | FUL     | The Bugle Returns Public House, 173 Upper Halliford Road Shepperton | 25/08/17        | 8                  | 8                | Feb-18         | 0                                 | May 2019: Site now occupied (after 31/03/19).  |
| 17/01274       | FUL     | Brooklands College Church Rd Ashford                                | 20/12/17        | 357                | 357              | Mar-18         | 0                                 | May 2019: Social housing component should be delivered within the next year. Anticipated completion of various blocks throughout 2019/2020/2021 with the whole site being complete by Winter 2021. |
| 17/01847       | PDO     | Benwell House   | 15/01/18        | 33                 | 33               | Nov-18         | 0                                 | May 2019: Conversion work due to take approx. 57 weeks.  |

| Application No | PA Type | Address                                  | Date PP granted | Scheme Gross Total | Scheme Net Total | Date commenced | Number of units completed to date | Comment  |
|----------------|---------|--|-----------------|--------------------|------------------|----------------|-----------------------------------|--|
| 17/01143       | FUL     | Staines Town Hall Market Square, Staines | 09/02/18        | 13                 | 13               | Nov-18         | 0                                 | No response received June 2019 – Works recently commenced on site  |
| 18/00048       | PDO     | Old Police Station, 2 London Rd, Staines | 06/03/18        | 14                 | 14               | Jun-18         | 0                                 | March 2019: site nearing completion  |
| 18/00094       | RVC     | Bridge House Bridge St, Staines          | 08/05/18        | 9                  | 9                | Jan-19         | 0                                 | No response received   |
| 18/00529       | FUL     | Benwell House Green St Sunbury           | 26/07/18        | 24                 | 24               | Nov-18         | 0                                 | May 2019: Waiting for site investigation pre-commencement conditions to be discharged. Actions the Council could take to help speed up delivery of housing: Improve the time taken for getting contamination/ground condition related conditions approved. |

| Application No | PA Type | Address  | Date PP granted | Scheme Gross Total | Scheme Net Total | Date commenced | Number of units completed to date | Comment   |
|----------------|---------|--|-----------------|--------------------|------------------|----------------|-----------------------------------|---|
| 18/00953       | FUL     | Halliford Studios Ltd<br>Manygate Lane<br>Shepperton | 08/11/18        | 24                 | 24               | Aug-18         | 0                                 | May 2019: Site still under construction. Anticipated completion date of all plots: end Feb/May 2020. At present no issues have been identified to delay completion, although there is currently an enforcement issue on the site concerning the boundary wall and the appeal decision has taken longer than anticipated. The relocation of the sub-station has delayed commencement of Plot 1, although good progress has been made with UK Power Network. Action the Council could take to help speed up delivery of housing: Improve the time in agreeing the ground contamination details under the discharge of the pre-commencement planning conditions. |
| 18/01228       | FUL     | Ashford Depot<br>Poplar Rd<br>Ashford                | 02/01/19        | 37                 | 37               | Jan-19         | 0                                 | No response received  |



| Application No | PA Type | Address                                     | Date PP granted | Scheme Gross Total | Scheme Net Total | Date commenced | Number of units completed to date | Comment  |
|----------------|---------|---|-----------------|--------------------|------------------|----------------|-----------------------------------|--|
| 18/01293       | RVC     | 7-11 Manygate Lane Shepperton               | 04/01/19        | 22                 | 19               | Jan-18         | 16                                | March 2019: site nearing completion  |
| 18/01623       | RVC     | Imtech House, 33-35 Woodthorpe Road Ashford | 04/02/19        | 50                 | 50               | Sep-18         | 0                                 | May 2019: Completion date anticipated July 2019.<br><br>Progress has been slow due to delays in planning application approval, building control requirements not being considered in original planning permission and utility provider requirements. |
| 17/01923       | FUL     | Charter Square (Phase II) High St Staines   | 15/02/19        | 104                | 104              | Feb-19         | 0                                 | Anticipated commencement on site this summer.  |
| 18/01026       | FUL     | 62 Church Rd Ashford                        | 21/09/18        | 5                  | 3                | Apr-19         |                                   | March 2019: Site still under construction  |

## Appendix 6

**Table 23 Sites with outstanding planning permission at 31 March 2019**

| Application No | PA Type | Address   | Date PP granted | Site Area | Scheme Gross Total | Scheme Net Total | Comment   |
|----------------|---------|---|-----------------|-----------|--------------------|------------------|---|
| 16/01883       | PDO     | Ellington House,<br>3 Station Approach<br>Ashford | 19/12/2016      | 0.01      | 8                  | 8                | No response received  |
| 16/01900       | FUL     | 381-385<br>Staines Road<br>West<br>Ashford        | 13/02/2017      | 0.26      | 12                 | 10               | No response received  |
| 17/00560       | FUL     | 55 Woodthorpe<br>Road<br>Ashford                  | 29/08/2017      | 0.16      | 9                  | 9                | May 2019: The cost of implementing the approved permission has put the feasibility of the project into question. Considering other options for developing the site. |

| Application No | PA Type | Address  | Date PP granted | Site Area | Scheme Gross Total | Scheme Net Total | Comment  |
|----------------|---------|--|-----------------|-----------|--------------------|------------------|--|
| 17/00782       | FUL     | Headline House<br>Stanwell Road<br>Ashford             | 22/09/2017      | 0.09      | 10                 | 10               | May 2019: Commencement date unknown. Waiting for conditions to be discharged.<br>Actions the Council could take to speed up delivery of housing: Process discharge of conditions in a timely manner – delay with contaminated land condition.  |
| 17/00366       | FUL     | Monkey Puzzle House. 69-71<br>Windmill Road<br>Sunbury | 26/09/2017      | 0.17      | 14                 | 14               | June 2019: Reviewing the housing market position.  |
| 16/01158       | FUL     | 17 – 51<br>London Road<br>Staines                      | 30/10/2017      | 1.09      | 253                | 253              | May 2019: Site Sold to Berkeley Homes. Planning application for 474 units refused by Planning Committee in November 2018. An appeal has been lodged and this is due to be heard in November 2019. A revised planning application is due to be considered by the Planning Committee in June 2019. |
| 16/01591       | FUL     | Hithermoor Farm,<br>6 Farm Way<br>Stanwell Moor        | 07/11/2017      | 0.86      | 23                 | 23               | No response received.  |

| Application No | PA Type | Address  | Date PP granted | Site Area | Scheme Gross Total | Scheme Net Total | Comment  |
|----------------|---------|--|-----------------|-----------|--------------------|------------------|--|
| 17/01400       | FUL     | Inglewood Hall<br>Green Street<br>Sunbury  | 10/11/2017      | 0.20      | 6                  | 6                | No response received.  |
| 17/01634       | FUL     | 42 High St<br>Shepperton   | 09/02/2018      | 0.01      | 6                  | 6                | May 2019: Developer proposing some amendments to current permission. Unable to confirm any delivery timescales until amendments have been approved. Still in use as an office. |
| 17/01920       | FUL     | Land to r/o 7-9<br>Woodthorpe Road<br>& 5<br>Station<br>Road/Woodthorpe<br>Road<br>Ashford | 23/02/2018      | 0.04      | 5                  | 5                | No response received.  |
| 17/00640       | FUL     | 524-538<br>London Rd<br>Ashford  | 04/05/2018      | 0.39      | 58                 | 55               | No response received.  |
| 18/00321       | FUL     | Dolphin House,<br>140<br>Windmill Road<br>Sunbury  | 31/05/2018      | 0.09      | 7                  | 7                | May 2019: According to the developer the site is now complete.   |

| Application No | PA Type | Address   | Date PP granted | Site Area | Scheme Gross Total | Scheme Net Total | Comment  |
|----------------|---------|---|-----------------|-----------|--------------------|------------------|--|
| 17/01365       | OUT     | Renshaw Industrial Estate<br>Mill mead<br>Staines                     | 27/07/2018      | 0.86      | 275                | 275              | June 2019 – Reserved Matters to be submitted but there is no date yet. Comments on the new link road to the south. |
| 18/00836       | FUL     | 20 Bridge St<br>Staines   | 30/07/2018      | 0.01      | 8                  | 8                | No response received.  |
| 18/00995       | PDO     | 5 – 7<br>Clarence Street<br>Staines                                   | 22/08/2018      | 0.01      | 5                  | 5                | No response received.  |
| 18/00691       | FUL     | Jobi<br>Short Lane<br>Stanwell  | 07/09/2018      | 0.05      | 5                  | 4                | No response received.  |
| 18/01004       | PDO     | Units 3 & 4, The<br>Summit Business<br>Park<br>Hanworth Rd<br>Sunbury | 07/09/2018      | 0.92      | 100                | 100              | No response received.  |
| 18/01026       | FUL     | 62 Church Rd<br>Ashford   | 21/09/2018      | 0.04      | 5                  | 3                | May 2019: Development now under construction   |

| Application No | PA Type | Address  | Date PP granted | Site Area | Scheme Gross Total | Scheme Net Total | Comment   |
|----------------|---------|--|-----------------|-----------|--------------------|------------------|---|
| 18/01136       | PDO     | Strata Technology Ltd, Strata House<br>Batavia Road<br>Sunbury | 01/10/2018      | 0.08      | 12                 | 12               | May 2019: Site sold. Current application 19/00612/PDO with different applicant and agent pending consideration.   |
| 18/01267       | PDO     | West Wing,<br>Council Offices<br>Knowle Green<br>Staines       | 22/10/2018      | 0.06      | 25                 | 25               | No response received.   |
| 18/01464       | FUL     | 62 Kingston Road<br>Staines                                    | 30/01/2019      | 0.05      | 6                  | 5                | No response received.   |
| 18/01672       | PDO     | Heliting House, 5-<br>16 London Rd<br>Staines                  | 31/01/2019      | 0.04      | 53                 | 53               | May 2019: Preparation of the building has begun and the main contract work is scheduled to start 1 July 2019. Completion anticipated end of July 2020.  |
| 18/01424       | FUL     | The Old Post<br>Office,<br>1 Knapp Rd<br>Ashford               | 07/02/2019      | 0.16      | 14                 | 14               | May 2019: The owner of the site is currently in the process of selling the site to a housebuilder and relocating his business. It is anticipated that the site sale should be finalised in the next 6 months. Work on the site is likely to start in about 9 months once all the conditions have been discharged. |

| Application No | PA Type | Address   | Date PP granted | Site Area | Scheme Gross Total | Scheme Net Total | Comment   |
|----------------|---------|---|-----------------|-----------|--------------------|------------------|---|
| 18/01749       | PDO     | 61-63 High St Staines                                       | 12/02/2019      | 0.07      | 5                  | 5                | No response received.   |
| 19/00102       | PDO     | HM Revenue & Customs, Forum House, 14 Thames Street Staines | 27/02/2019      | 0.05      | 40                 | 40               | No response received.   |
| 18/01282       | FUL     | 103 London Road Staines                                     | 07/03/2019      | 0.08      | 9                  | 9                | No response received.   |
| 18/01533       | FUL     | Two Rivers Pub and Restaurant, 43 Church Street Staines     | 08/03/2019      | 0.14      | 11                 | 11               | Spelthorne is currently processing an application for a non-material minor amendment. |
| 19/00063       | PDO     | 6-8 Wolsey Road Ashford                                     | 18/03/2019      | 0.01      | 9                  | 9                | No response received.   |
| 18/01000       | FUL     | Jewson's Moor Lane Staines                                  | PENDING S106    | 0.59      | 36                 | 36               | No response received.   |